



Education is that which liberates

Safeguarding Policy

The Swaminarayan School

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Chair of Governors: Piyush Amin; **Governor in charge of Safeguarding:** Dipak Patel

Head Teachers: Nilesh Manani (Senior School) & Umesh Raja (Prep School)

Designated Safeguarding Lead: James Hopkins (Senior School Deputy Head)

EYFS Designated Safeguarding Lead: Mrig Divecha (Head of EYFS)

Senior School Safeguarding Officers: Sylvie Alexander (PSHCE Coordinator) and Nilesh Manani (Head of Senior School)

Prep School Safeguarding Officers: Jamie Pitchford (Senior Teacher) Anthony Chavez (Assistant Head)

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TABLE OF CONTENTS

| CONTENTS | Page |
|---|------|
| Named Staff & Contacts | 3 |
| Introduction | 5 |
| Safeguarding Commitment | 6 |
| Roles and Responsibilities General | 7 |
| Board of Governors | 7 |
| Headteacher | 9 |
| Designated Safeguarding Lead | 9 |
| Safeguarding Officers | 10 |
| Safeguarding Training | 11 |
| Records, Monitoring and Transfer | 12 |
| Support to pupils and School Staff | 12 |
| Other Relevant Policies | 14 |
| The Use of Cameras and Mobile Phones | 15 |
| Recruitment and Selection of Staff | 15 |
| Appendix 1 - Procedure to follow in cases of possible, alleged or suspected abuse | 16 |
| Appendix 2 - Procedure for allegations against staff and volunteers | 17 |
| Appendix 3 – Record of Concern | 20 |
| Appendix 4 - Child in Need - S17 of the Children Act 1989: | 22 |
| Types of Abuse and Possible Signs | 23 |
| Child Sexual Exploitation | 26 |
| Female Genital Mutilation | 26 |
| Appendix 5 - Safeguarding pupils who are vulnerable to extremism and radicalisation | 27 |
| Appendix 6 – Radicalisation and Extremism Risk Assessment | 30 |
| Appendix 7 – Staff Code Of Conduct Is Contained In The DSCF Document | 31 |
| Appendix 8 – Forms for visiting speakers | 33 |
| Appendix 9 – Youth Produced Sexual Imagery | 36 |
| Appendix 10 – Trafficking | 41 |

Named Staff & Contacts

Designated Safeguarding Lead/Prevent Single Point of Contact:

Mr James Hopkins, Deputy Head Senior School Tel: 0208 965 8381

e-mail: jameshopkins@tssuk.org

EYFS Designated Safeguarding Lead:

Ms Mrig Divecha, Head of EYFS Tel: 0208 965 8381

email: mrigdivecha@tssuk.org

Safeguarding Officers

Prep School

Mr Jamie Pitchford, SEN & Senior Teacher Tel: 0208 965 8381 email: jamiepochford@tssuk.org

Mr Anthony Chavez, Senior Teacher Tel: 0208 965 8381 email: anthonychavez@tssuk.org

Senior School

Ms Sylvie Alexander, Head of PSHCE Tel: 0208 965 8381 email: sylviealexander@tssuk.org

[Mr Nilesh Manani](#)

Governor in Charge of Safeguarding:

Mr Dipak Patel, Governor Tel: 0208 965 8381

Chair of Governors:

Mr Piyush Amin, Chair of Governors, Tel: 0208 965 8381

Headteachers:

Mr Umesh Raja (Prep School), Tel: 0208 965 8381 email: admin@tssuk.org

Mr Nilesh Manani (Senior School), Tel: 0208 965 8381 email: admin@tssuk.org

Referrals and advice:

- Brent safeguarding referrals should be made to the Brent Family Front Door:
Tel. 0208 937 4300 (Option 1 for Children)

Social Care Division (Brent Family Front Door), Family Services Unit
1st Floor, Hampton House,
1B, Dyne Road,
London NW6 7XG

- Harrow Children & Family Services: Tel: 020 8901 2690
 - Barnet Multi-Agency Safeguarding Hub: Tel. 020 8359 4066
 - Camden Safeguarding Children Board: Tel. 020 7974 6639
 - Westminster Safeguarding Board: Tel: 020 8753 3914
- London Safeguarding Children Board (all local safeguarding Board contact details can be found here): <http://www.londonscb.gov.uk/>

LADO Designated officers for allegations against staff:

- Brent Designated Officer (DO): Yvonne Prince
Tel: 0208 937 2090 Mobile: 07900 770304
Email: yvonne.prince@brent.gov.uk

Contact with the LADO is to be by the Headteacher or Deputy Headteacher

Prevent duty:

Kibibi Octave
Local Authority Coordinator:
Tel: 020 8937 4225
Email: Kibibi.octave@brent.gov.uk

Prevent Engagement Officer for concerns about radicalisation:

Naomi Conlon, Police Constable

SO15 Counter Terrorism Command (Met Police)
Wembley Police Station
603 Harrow Road
Wembley HA0 2HH

Mobile 07827 357499
Email: Naomi.conlon@met.police.uk

PREVENT DfE helpline for advice: Tel: 0207 340 7264
email: counter-extremism@education.gsi.gov.uk

Local police Force: Non-emergency/report FGM: 101

INTRODUCTION

The Swaminarayan School fully recognises the contribution it can make to protect children and support pupils in school. The aim of the policy is to safeguard and promote our pupils' welfare, safety and health by fostering an honest, open, caring and supportive climate. The pupils' welfare is of paramount importance.

This policy is consistent with:

The legal duty to safeguard and promote the welfare of children, as described in section 175 of the Education Act 2002 [or section 157 of the Education Act 2002 for independent schools and academies]

Equality Act (2010),

Keeping Children Safe in Education (September 2016) (KCSIE)

- o KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (February 2015)

- o KCSIE also refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015)

Working Together to Safeguard - A guide to inter-agency working to safeguard and promote the welfare of children (March 2015) (WT)

- o WT refers to the non-statutory advice: Information sharing (March 2015) Prevent Duty Guidance: for England and Wales (March 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:

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

- o The use of social media for on-line radicalization (July 2015)

- o Child Sexual Exploitation: Definition Guide for Practitioners et al (February 2017)

The Independent School Standards Regulations (2014)

The Local Children's Safeguarding Board (LCSB) procedures, available on their websites (eg. www.brent.gov.uk) which contain the interagency processes, protocols and expectations for safeguarding children. We recognise our pupils are from a range of boroughs and work with boroughs within which pupils reside as well as Brent.

There are four main elements to our Safeguarding Policy:

- Prevention e.g. positive school atmosphere, teaching and pastoral support to pupils;
- Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Safeguarding concerns;
- Support to pupils and school staff and to children who may have been abused;
- Working with parents to ensure appropriate communications and actions are undertaken.

This policy applies to all Staff, Volunteers, Governors and visitors to the School. We recognise that Safeguarding is the responsibility of all staff within our School and Safeguarding is addressed in all recruitment interviews. We will ensure that all parents and other working partners are aware of our Safeguarding Policy by including the policy on our web site and by displaying appropriate information upon Staffroom Noticeboards.

EXTENDED SCHOOL ACTIVITIES

Where the school provides services or activities directly under the supervision or management of School staff, the School's arrangements for Safeguarding will apply. Where services or activities are provided by another group, (e.g. a field study centre), the member of staff responsible for arranging the activity (and where possible the Governors) should monitor and ensure appropriate policies and procedures are in place to safeguard and protect children and arrangements to liaise with the school on these matters where appropriate.

SAFEGUARDING COMMITMENT

The school adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. Staff hope that children and parents will feel free to talk about any concerns and will see school as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

Our School will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to;
- Ensure that children know that there are adults in the School whom they can approach if they are worried or are in difficulty;
- Include in the curriculum activities and opportunities for PSHCE which equip children with the skills they need to stay safe from abuse (including online), and to know whom they can turn to for help;
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- The School has established links with the Brent Family Front Door and works with other agencies to establish access to Early Help Services. There is also preventative education with respect to e-safety and personal safety. Regular contact occurs with Childrens' Social Care to support individuals in need.
- Operate safer recruitment procedures and make sure all appropriate checks, including references, are carried out on all staff and volunteers who work with children, including identity, right to work, enhanced DSB criminal record and barred list (and overseas where needed), references and prohibition from teaching or managing in schools (s.128).

SAFEGUARDING IN THE CURRICULUM

Children are taught about safeguarding in school. The following areas are among those addressed in PSHCE and in the wider curriculum

- Bullying/Cyberbullying
- Drugs, Alcohol & Substance Misuse
- E safety/Internet safety
- Extremism and Radicalisation: how to build resilience to -risks of radicalisation (Appendices 5 & 6)
- Road safety
- Relationships/Domestic Violence/Consent
- Diversity Issues e.g. forced marriage, honour based violence, Female Genital Mutilation (FGM) (Appendix 4)
- Sexual Exploitation of Children

- Equal Opportunities
- Disability
- Fire safety
- Personal safety

Further details of the content and timing of delivery of the PSHCE programme are available on the school website.

ROLES AND RESPONSIBILITIES

General

All adults working with or on behalf of children have a responsibility to safeguard and promote the welfare of children. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with Safeguarding responsibilities within the School. All staff have been made aware of the different types of child abuse and specific safeguarding issues, as indicated in Keeping Children Safe in Education (September 2016) document. Normally concerns are referred to and managed by the DSL.

All concerns warranting a same day response should be phoned into Brent Family Front Door or the pupil's borough of residence, this will normally be done by the DSL. All other concerns are to be referred via the LSCB on-line form – parents should be informed of this first unless it is not in the interest of the child's safety to do so.

There are, however, key people within the School who have specific responsibilities (see p3).

Board of Governors

Roles and responsibilities of the Board of Governors (co-ordinated by the Governor in Charge of Safeguarding) in accordance with the Statutory Guidance "Keeping Children Safe in Education" September 2016 and the Independent Schools Standards regulations on recruitment, the Governors will ensure the following:

- The School has a safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is available on the School website.
- Must ensure the School keeps an up to date single central register of appointments
- The School operates safe recruitment practices, including a standard application form, appropriate use of references, verification of qualifications and DBS checks on new staff and volunteers. Gaps in an applicant's employment history will be followed up and also if the applicant's last school is not given as a point for references. Furthermore, the Headteacher and Recruitment staff have undertaken Safer Recruitment Training and Assessment, which is refreshed every 5 years.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers (see Appendix 2). These are referred directly to the Headteachers.
- There are senior members of the School's leadership team who are designated to take lead responsibility for dealing with Safeguarding (the "Designated Safeguarding Lead") assisted by the Deputy Designated Safeguarding Lead along with a team of Safeguarding Officers within both the Prep and Senior School. Within the EYFS setting the Designated Safeguarding Lead is the Head of EYFS, Ms Mrig Divecha. There is also a nominated Governor in Charge of Safeguarding – Mr Dipak Patel.

- The Designated Safeguarding Leads for Safeguarding undertake effective Level 3 Safeguarding training and this is refreshed every two years. Training is provided by approved Level 3 Safeguarding Training Providers and the LSBC. In addition to this formal training, their knowledge and skills are updated at regular intervals via safeguarding meetings, e-briefings etc.
- The Headteacher, and all other staff and volunteers who work with children, undertake appropriate training, delivered by approved Safeguarding providers, which is kept up-to-date by refresher training at two-yearly intervals and new staff and volunteers who work with children are made aware of the school's arrangements for Safeguarding and their responsibilities (including this policy and Part 1 of Keeping Children Safe In Education).
- Any deficiencies or weaknesses brought to the attention of the Designated Safeguarding Lead are rectified without delay.
- The Chair of the Governors deals with any allegations of abuse made against the Headteacher (without informing the Headteacher), in liaison with the Local Authority Designated Officer (LADO).
- Effective policies and procedures are in place and updated annually including behaviour “Code of conduct” for staff and volunteers – “Guidance for Safer Working Practice for those who work with children in education settings October 2015”.
- There is an individual member of the Board of Governors (Mr Dipak Patel) who will champion issues to do with safeguarding children and Safeguarding within the School, liaise with the Designated Safeguarding Lead for Safeguarding to ensure there is an annual review during which the policy is updated and provide information and reports to the Board of Governors.
- The School contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” March 2015 including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through school provision or via referral to an external support agency. The School has established links with Childrens’ Social Care, amongst other agencies, all of which seek to support the children with additional needs. Safeguarding arrangements take into account the procedures and practice of the local authority and the Local Safeguarding Children Board (LSCB).

Roles and responsibilities of the Headteachers

The Headteacher of the Prep and Senior School will ensure that:

- The policies and procedures adopted by the Board of Governors are fully implemented, and followed by all staff;
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other interagency meetings, and contributing to the assessment of children;
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer (LADO).
- A report is made to the DBS within 1 month any employee, volunteer or contractor who was engaged by the school whose services are no longer used because he or she is considered unsuitable to work with children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Brent Family Front Door or the Police.
- All staff and volunteers are recruited following DBS checks and compliance with Independent Schools Standards regulations.

Roles & responsibilities for the Designated Safeguarding Lead for Safeguarding

The responsibilities of the Designated Safeguarding Lead are found in Annex B of Keeping Children Safe in Education and include:

- Provision of information to the LSCB on how the Board of Governors discharges its duties regarding Safeguarding in compliance with Section 14B of the Children's Act 2004;
- liaison with the Board of Governors and Local Authority on any deficiencies brought to attention of the Board of Governors and how these should be rectified without delay;
- management and referral of cases of suspected abuse to Brent Family Front Door, local borough childrens' services; and/or the police where a crime may have been committed.
- act as a source of support, advice and expertise within the school;
- attend and contribute to Safeguarding conferences when required to do so;
- be alert to the specific needs of children in need, those with educational needs and young carers;
- liaise with Heads to inform them of any issues and ongoing investigations and ensure there is always cover for this role;
- recognise how to identify signs of abuse and when it is appropriate to make a referral; (Appendix 4)
- have a working knowledge of how Brent Family Front Door operates, the conduct of a Safeguarding case conference, and be able to attend and contribute to these effectively when required to do so;
- ensure the School's Safeguarding policy is updated and reviewed annually and displayed on the school website.

- ensure each member of staff has access to and understands the school's safeguarding policy especially new or part-time staff who may work with different educational establishments; The full policy is available on the school web site and a summary of how to manage a disclosure is printed in and available in the appendix of the policy and on the Staffroom noticeboards. All new staff receive and must read the safeguarding policy and KCSIE (2016) part 1 and Annex A when they join. All existing staff have been issued with these documents and have read them.

- Ensure all staff have induction training. Training will include:
 - the School's safeguarding policy;
 - behaviour policy;
 - knowledge of the DSLs;
 - be able to recognise and report any concerns immediately they arise;
 - be given Keeping Children Safe in Education Part 1;
 - be given Keeping Children Safe in Education Annex A;
 - staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships and communications including use of social media).

Appendix 7 contains a link to the Department for Children, Schools and Families document '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings*' which is used to give clear guidance to staff about their behaviour and actions so as not to place either pupils or themselves at risk of harm or allegations of harm to a pupil.

- Whistle-blowing procedures in conjunction with staff code of conduct
- Whole school LSCB safeguarding training will be delivered by the LSCB every three years.

Significant changes to policy, practice and any new legislation will be brought to the attention of staff through refresher training sessions during INSET and via LSCB briefings and emails as well as Phase Meetings.

- be able to keep detailed, accurate and secure written records of referrals/concerns. These records are stored in a locked filing cabinet in Reception.
- obtain access to resources and attend any relevant or refresher training courses every two years. Keep up to date with new developments in safeguarding by accessing briefings and journals.
- when children leave the School, ensure their Safeguarding file is handed to the Designated Safeguarding Lead and signed for in the new school/college as soon as possible.
- maintain and monitor Safeguarding records, including monitoring and acting upon individual and patterns of concerns or complaints (e.g. children who repeatedly go missing), in accordance with section on "Records, Monitoring and Transfer" overleaf.

Roles & Responsibilities for Designated Safeguarding officers

- Management and referral of cases of suspected abuse to Brent Family Front Door, local borough childrens' services; and/or the police where a crime may have been committed.
- act as a source of support and advice to colleagues within the school;
- attend and contribute to Safeguarding conferences when required to do so;
- be alert to the specific needs of children in need, those with educational needs and young carers;
- liaise with the DSL to inform them of any issues and ongoing investigations and ensure there is always cover for this role;
- recognise how to identify signs of abuse and when it is appropriate to make a referral; (Appendix 4)

- have a working knowledge of how Brent Family Front Door operates, the conduct of a Safeguarding case conference, and be able to attend and contribute to these effectively when required to do so;
- work with the DSL to ensure each member of staff has access to and understands the school's safeguarding policy especially new or part-time staff who may work with different educational establishments; All new staff receive and must read the safeguarding policy and KCSIE (2016) part 1 and Annex A when they join. All existing staff have been issued with these documents and have read them.
- Support the DSL to ensure all staff have induction training. Training will include:
 - the School's safeguarding policy;
 - behaviour policy;
 - knowledge of the Safeguarding Officers;
 - be able to recognise and report any concerns immediately they arise;
 - be given Keeping Children Safe in Education Part 1;
 - be given Keeping Children Safe in Education Annex A;
 - staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships and communications including use of social media).
- be able to keep detailed, accurate and secure written records of referrals/concerns. These records are stored in a locked filing cabinet in Reception.
- obtain access to resources and attend any relevant or refresher training courses every two years. Keep up to date with new developments in safeguarding by accessing briefings and journals.
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- maintain and monitor Safeguarding records, including monitoring and acting upon individual and patterns of concerns or complaints (e.g. children who repeatedly go missing), in accordance with section on "Records, Monitoring and Transfer" overleaf.

SAFEGUARDING TRAINING

This details all recent safeguarding training for staff at The Swaminarayan School:

- Level 3 Safeguarding DSL Training – M Reddington (February 2017);
- Level 3 Safeguarding Officer Training: J Hopkins, M Divecha, J Pitchford, S Alexander, N Manani (June 2016). A Chavez (Feb 2016)
- EYFS Safeguarding Level 3 DSL Training – M Divecha (Jan 2016)
- Training by LSCB: All Prep Teaching & Learning Staff – August 2016; All Senior Teaching & Learning Staff – September 2016.
- Ancillary Staff Safeguarding Training (Sept 2016)
- Whole School PREVENT online training modules (From Jan 2016)
- Safer Recruitment Training: U Raja and Nilesh Manani (2015)

RECORDS, MONITORING AND TRANSFER

Well-kept records are essential to good Safeguarding practice. All staff are clear about the need to record and report concerns about a child or children within our school. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

Safeguarding records are stored securely, with access confined to specific staff, i.e. the Designated Safeguarding Lead, The Deputy Designated Safeguarding Lead and the Headteacher. Records are kept for all time.

Safeguarding records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.

When children transfer school their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving school, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead and a photocopy kept. Files requested by other agencies e.g. Police, Court, Social Services should be copied.

SUPPORT TO PUPILS AND SCHOOL STAFF

Vulnerable children - Supporting pupils at risk

The School recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children, school may be one of the few stable, secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. Our School seeks to remove any barriers that may exist in being able to recognise abuse or neglect in pupils experiencing Special Educational Needs or Disability. We will seek to provide such children with the necessary support and to build their self-esteem and confidence. The pastoral system offers support in a number of ways including Class Teachers/Tutors, a Safeguarding team, trained Peer mediators as well as approachable Heads and Deputies.

Peer on Peer Abuse - The School recognises that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred on for appropriate support and intervention. Such abuse will not be tolerated or passed off as 'banter' or 'part of growing up'. This abuse could for example include assaults (whether physical or sexual), initiation/hazing type violence, all forms of bullying, aggravated sexting and physical violence. There are separate school policies to address this including the Behaviour Policy, Anti-Bullying Policy and E-safety Policy. Where

specific risks are identified, a risk assessment will be undertaken in order to ensure the safety of all staff and pupils.

Children Missing From Education – our school recognises the entitlement that all children have to education and will work closely with the local authority to share information about pupils who may be missing out on full time education or who go missing from education. The local authority will also be informed where children are to be removed from the school register a) to be educated outside the school system; b) for medical reasons; c) because they have ceased to attend; d) because they are in custody; e) because they have been permanently excluded.

Complaints or concerns expressed by parents or pupils

The Swaminarayan School recognises that listening to children/young people is an important and essential part of safeguarding them against abuse and neglect. To this end any expression of dissatisfaction or disquiet in relation to an individual child/young person will be listened to and acted upon in order to safeguard his/her welfare. We will also seek to ensure that the parent or individual child/young person who makes a complaint is informed about the action the school will take. The school will also endeavour to keep the parent/child/young person regularly informed as to the progress of his/her complaint.

Support for staff

The School recognises that staff, as part of their duty to safeguard and promote the welfare of children and young people, may hear information, either from the child/young person as part of a disclosure or from another adult that will be emotionally upsetting.

Where a member of staff is distressed as a result of dealing with a Safeguarding concern, he/she should in the first instance speak to the Designated Safeguarding Lead about the support he/she requires. The Designated Safeguarding Lead should seek to arrange the necessary support.

WORKING WITH PARENTS/CARERS

The School will:

- Ensure that parents/carers have an understanding of the responsibility placed on the school and staff for Safeguarding by setting out its obligations in the safeguarding policy which is published on the school website.
- Undertake appropriate discussion with parent/carers prior to involvement of Children and Family Services Children's Social Care or another agency, unless to do so would place the child at risk of harm or compromise an investigation.
- Work to develop productive, supportive relationships with parents/carers whenever it is in the child's interest to do so.

OTHER RELEVANT POLICIES

The Board of Governors statutory responsibility for safeguarding the welfare of children goes beyond simply Safeguarding. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Behaviour Management
- Staff Code of Conduct
- Special Educational Needs and Disability
- Anti-Bullying
- Trips
- First Aid
- Health & Safety
- Equal Opportunities
- Recruitment

The above list is not exhaustive but when undertaking development or planning of any kind the school will consider the implications of safeguarding and promoting the welfare of children.

The Use of Cameras and Mobile Phones

The following must be noted about the use of Cameras and Mobile Phones. (This is particularly relevant to those working within EYFS). Staff working directly with children in a classroom situation must not use mobile phones to make or receive calls or to send or receive texts.

Mobile phones must not be used in pupil based areas. Lunchtime Supervisors and Aftercare Supervisors must also keep mobile phones away whilst they carry out their duties. Mobile phones must only be used during a designated break and away from areas where children are present (eg staffroom).

Staff must not use their personal mobile technology to take photographs or recordings of children anywhere within school grounds or on school trips, visits and sporting fixtures. Exceptions include parents using mobile phones to take photos or recordings during school events such as Sports Days, Class Assemblies and other special events. Parents are reminded that photos of other people's children are not published on social networking sites, eg Facebook.

It is strongly recommended that a school mobile phone should be carried by the trip leader on every school outing and to every off-site sporting fixture. Parents will be informed of the number when they give consent for their child to attend the trip (for emergencies only).

Staff should use a school camera/ipad to take photographs and recordings of children. These images should not be stored on memory sticks or personal computers at home. Any images on the website, school social media sites or in the local press should not include full pupil names.

RECRUITMENT AND SELECTION OF STAFF

The School's safer recruitment processes are based on the Statutory Guidance: *Keeping Children Safe in Education September 2016, Part 3: Safer Recruitment*. The school will provide all the relevant information in references for a member of staff about whom there have been concerns about Safeguarding/inappropriate conduct. Cases in which an allegation has been proven to be unsubstantiated, unfounded or malicious will not be included in employer references. A history of

repeated concerns or allegations which have been found to be unsubstantiated, malicious etc. will also not be included in a reference.

The School complies with the Independent Schools Standards regulations on recruitment.

The School has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an on-going culture of vigilance. All new staff and volunteers receive safeguarding induction and are briefed on the code of conduct for adults working with children.

In line with statutory guidance on every interview panel for school staff at least one member (Teacher/Manager/Governor) will have undertaken safer recruitment training, either online or by attending an approved Safer Recruitment training course.

When a teacher has been dismissed for misconduct (or would have been had he/she not resigned first) consideration will be given to make a referral to the National College for teaching and leadership (NCTL)

Appendix 1 PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

Contents

- **General**
- **Individual Staff Volunteers/Other Adults**
- **Designated Safeguarding Leads**

GENERAL

The Local Safeguarding Childrens' Board's Procedures are available at www.brent.gov.uk. These contain the inter-agency processes, protocols and expectations for safeguarding children. The DSL is expected to be familiar with these, particularly the referral process.

It is important that all parties act swiftly and avoid delay.

The DSL may seek advice and guidance from the Brent Family Front Door telephone line or one held with the pupil's borough of residence, particularly if there is doubt about how to proceed (see contacts at the start of the policy). Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.

Written records, dated and attributed, must be made of what has been alleged, noticed and reported, and kept securely and confidentially.

In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and require assessment to see whether additional support or services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.

INDIVIDUAL STAFF/VOLUNTEERS/OTHER ADULTS - MAIN PROCEDURAL STEPS

When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured, and if possible at this stage should be informed what action will be taken next. Where possible, leave them to explain their concern to the police so as not to compromise the investigation.

As soon as possible write a dated and timed note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead in the school.

If the concern involves the conduct of a member of staff, a volunteer, a visitor, a Governor, a trainee or another young person or child the Headteacher must be informed. The concern should not be discussed with the member of staff involved.

If the allegation is about the DSL, the information should be passed to the Headteacher, without the DSL being informed.

If the allegation is about the Headteacher, the information should be passed to the Chair of Governors, without the Headteacher being informed.

If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

DESIGNATED SENIOR PERSON FOR SAFEGUARDING - MAIN PROCEDURAL STEPS

Manage a case file which will hold a record of communications and actions in a coherent order, to be stored securely. (see Section on Records, Monitoring & Transfers)

Where initial enquiries do not justify a referral to the investigating agencies inform the initiating adult and monitor the situation. If in doubt, seek advice from Brent Family Front Door.

Share information confidentially with those who need to know.

Where there is a Safeguarding concern requiring immediate, same day, intervention from Children's Social Care should be contacted by phone. Written confirmation should be made within 24 hours on the LSCB Agency Referral Form to Children's Social Care. All other referrals should be made using the online form. The Duty Managers are available for advice to the DSL on the numbers given in the contact details on page 3 of this document.

If the concern is about children using sexually abusive behaviour, refer to the separate guidance.

If it appears that urgent medical attention is required arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.

Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving school, take advice from the DSL/Duty Social Worker (for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker takes responsibility.

APPENDIX 2

PROCEDURE FOR ALLEGATIONS AGAINST STAFF (INCLUDING THE HEAD) AND VOLUNTEERS

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

Relevant documents:

- DfE 'Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges' September 2016, part 4: Allegations of abuse made against teachers and other staff.

INDIVIDUAL STAFF/DSL/VOLUNTEERS/OTHER ADULTS WHO RECEIVE THE ALLEGATION

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report immediately to the Headteacher.
- Pass on the written record.
- If the allegation concerns the conduct of the Headteacher, report immediately to the Chair of Governors (or, in the absence of a Chair, the Governor in Charge of Safeguarding), without informing the Headteacher. Pass on the written record. The Chair of Governors deals with any allegations of abuse made against the Headteacher. If there is difficulty reporting to the Chair of Governors, contact the Governor in Charge of Safeguarding as soon as possible.

Headteacher or Chair of Board of Governors (only relevant in the case of an allegation against the Headteacher)

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Before taking further action notify and seek advice from the LADO on the same day.
- You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Report to Brent Family Front Door or local LSCB the child resides in if the LADO advises or if circumstances require a referral concerning a child.
- Ongoing involvement in cases:
- Liaison with the LADO.
- Co-operation with the investigating agency's enquiries as appropriate.
- Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.
- Possible referral to the DBS or NCTL, depending on the outcome.

Staff Allegation Procedure

Pupil makes a disclosure or allegation ensure you have told the pupil the information will be passed on



Record info name/date/time/notes then sign and date



Ensure the immediate safety of the pupil



Inform the Head in the absence of the Head the Chair of Governors OR If the allegation involves the Head then inform the Chair of Governors without notifying the Head



Send all information to the Head if the allegation involves a member of staff or the Chair of Governors If the allegation involves the Head



Consultations will be had between necessary parties No issue will be dealt with by one member of staff Head will seek advice from the LSCB/designated officer(s) on the best course of action



Relevant bodies will be informed Within 24 hours

Notes: Any member of staff can and should feel able to make a referral in exceptional circumstance. If the issue involves the potential for serious harm the children's social care should be informed from the outset.

Appendix 3 - RECORD OF CONCERN

| | | | |
|---|-----------------|------------------|------------|
| Child's Name : | | | |
| Child's DOB : | | | |
| Male/Female : | Ethnic Origin : | Disability Y/N : | Religion : |
| | | | |
| Date and time of concern : | | | |
| Your account of the concern (what was said, observed, reported and by whom) | | | |
| Additional information : (your opinion, context of concern/disclosure) | | | |

Your response (what did you do/say following the concern)

Your name :

Your signature :

Your position in School :

Date and time of this recording :

Action and response of DSL/Headteacher (Include details of siblings)

Name:

Date:.....

Appendix 4 - Child in Need - S17 of the Children Act 1989:

A 'Child in Need' referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required. Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:

- Child(ren) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority.
- Their health or development is likely to be impaired, or further impaired without the provision of such services.
- They are disabled.

If the DSL considers that the welfare concerns indicate that a 'Child in Need' referral is appropriate, he/she will speak with parents / young person and obtain their consent for referral to the First Response Team or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss the issues with the First Response Team.

Safeguarding (S47 Children Act 1989) S47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. Staff from this organisation do not investigate whether a child has been abused. This is the duty of Social workers from the Safeguarding team and the police. Education staff refer reasonable concerns which indicate that a child may be at risk of significant harm. It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a Safeguarding referral under S.47 must therefore provide information which clearly outlines the likelihood that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of illtreatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.

In order to understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of illtreatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development.

TYPES OF ABUSE AND POSSIBLE SIGNS

RECOGNISING PHYSICAL ABUSE Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen syndrome by proxy.

POSSIBLE SIGNS OF PHYSICAL ABUSE

The signs of physical abuse may include:

- Unexplained bruising, marks or injuries on any part of the body;
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh;
- Cigarette burns;
- Human bite marks;
- Broken bones;
- Scalds, with upward splash marks;
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation;
- Aggressive behaviour or severe temper outbursts;
- Flinching when approached or touched;
- Reluctance to get changed, for example in hot weather;
- Depression;
- Withdrawn behaviour;
- Running away from home.

RECOGNISING EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

POSSIBLE SIGNS OF EMOTIONAL ABUSE

- physical, mental and emotional development lags
- admission of punishment which appears excessive
- over-reaction to mistakes
- sudden speech disorders
- fear of new situations
- inappropriate emotional responses to painful situations
- neurotic behaviour (e.g. rocking; hair-twisting; thumb-sucking)
- self-mutilation

- fear of parents being contacted
- extreme of passivity or aggression
- drug/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

RECOGNISING ABUSE (NEGLECT)

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

POSSIBLE SIGNS OF NEGLECT

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- frequent lateness or non-attendance at school
- untreated medical problems
- destructive tendencies low self-esteem
- neurotic behaviour (e.g. rocking, hair-twisting; thumb-sucking)
- no social relationships

RECOGNISING SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

RECOGNISING ABUSE IN CHILDREN

POSSIBLE SIGNS OF SEXUAL ABUSE IN PUPILS (PREP SCHOOL AGE 2-11)

- hint about secrets they cannot tell
- say that a friend has a problem
- ask you if you will keep a secret if they tell you something
- begin lying, stealing, blatantly cheating in the hope of being caught
- have unexplained sources of money
- have terrifying dreams
- start wetting themselves

- exhibit sudden inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- stop enjoying previously liked activities, such as music, sports, art, scouts or guides, going to summer camp, gym club
- be reluctant to undress for gym
- become fearful of or refuse to see certain adults for no apparent reason; show dislike of a particular babysitter, relative or other adult
- act in a sexual way inappropriate to their age
- draw sexually explicit pictures depicting some act of abuse
- seem to be keeping secret something which is worrying them
- have urinary infections, bleeding or soreness in the genital or anal areas
- have soreness or bleeding in the throat
- have chronic ailments, such as stomach pains or headaches
- take over the parent role at home, seem old beyond their years (if a victim of incest)
- develop eating disorders, such as anorexia or bulimia
- become severely depressed, even attempt suicide
- have a poor self-image, self-mutilate
- continually run away

YOUNG PEOPLE OF SENIOR SCHOOL AGE (11-18 onwards) MAY:

- be chronically depressed be suicidal
- use drugs or drink to excess
- self-mutilate, show self-hatred
- have unexplained pregnancies
- experience memory loss
- become anorexic or bulimic
- run away frequently
- be inappropriately seductive
- be fearful about certain people like relatives or friends
- assume the role of parents in the house to such an extent that they do all the cooking, cleaning, child-minding and are taking care of everyone's needs except their own
- not be allowed to go out on dates or have friends round
- have soreness/bleeding in the genital or anal areas or in the throat
- find excuses not to go home or to a particular place
- have recurring nightmares/be afraid of the dark
- be unable to concentrate, seem to be in a world of their own
- have a 'friend who has a problem' and then tell about the abuse of the friend
- have chronic ailments such as stomach pains and headaches
- sexually abuse a child, sibling or friend
- exhibit a sudden change in schoolwork habits, become truant
- be withdrawn, isolated, or excessively worried • have outbursts of anger or irritability
- be fearful of undressing for gym
- have unexplained sums of money
- act in a sexually inappropriate way towards adults

Pupils with a **Special Educational Need or Disability** may be particularly vulnerable to abuse and neglect.

Child Sexual Exploitation (CSE) (Further information in KCSIE Annex A)

Sexual exploitation of children involves situations where young people receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common. Children do not become entrenched in CSE without first being subjected to targeted grooming or opportunistic abuse. Systemic sexual abuse is the final stage in a process. The Swaminarayan School recognise that pupils may be targeted for sexual exploitation, and staff will be vigilant for the indicators and report concerns to their DSL. The DSL is conversant with the LSCB procedures and will share information with parents and carers, and the police and social care in appropriate circumstances. We will work with other agencies on plans to protect children who are deemed to be at risk of exploitation. The Swaminarayan School believes that children need to understand how perpetrators groom children for exploitation. We will use appropriate resources in a sensitive and responsible way to educate young people about grooming behaviours, the risk of being drawn into exploitation, possible consequences, and ways of protecting themselves from the risk of sexual exploitation.

Female genital mutilation (FGM) (Further information in KCSIE Annex A)

Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. The mandatory reporting duty commenced in October 2015. Teachers will follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Lead and a report must be made to the Police.

Appendix 5 Radicalisation and the PREVENT Duty (Further information in KCSIE Annex A)

Our school recognises the duties placed on us by the Counter Terrorism Bill (July 2015) to prevent our pupils being drawn into terrorism. These include:

- Assessing the risk of pupils being drawn into terrorism
- Working in partnership with relevant agencies under the LSCB procedures
- Appropriate staff training
- Appropriate online filtering

Our school is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; the pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

Our school seeks to protect children and young people against the messages of all violent extremism including but not restricted to those linked to Islamic Ideology, Far Right / Neo Nazi ideology etc. Concerns should be referred to the Single Point Of Contact (SPOC) (the Designated Safeguarding Lead) who has local contact details for Prevent and Channel referrals. They will also consider whether circumstances require Police to be contacted.

The School has adopted the Governments' definitions for the purposes of compliance with the Prevent duty: Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism".

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel (a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism).

Prevent Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

"36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race / hate crime, lack of self-esteem or identity and personal or political grievances.

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increased time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day to day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group / cause / ideology;
- communications with others that suggest identification with a group / cause / ideology

52. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social and political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or plotting or conspiring with others.”

Appendix 8 - Protocol for visiting speakers

The Swaminarayan School will request that:

1. An organiser for the visitor/speaker is provided who will be the liaison with school.
2. The organiser must ascertain that all information communicated by the visitor/speaker is lawful and aligns to the values and ethos of the school and to British values.
3. The record of checks on visiting speakers which is held by the DSL on a Visiting Speaker Form sent in advance of the meeting..

Further guidelines School safeguarding procedures apply and visiting speakers will be issued with a visitors badge which includes visitor information which they will be asked to familiarise themselves with and wear at all times.

Visitors must be accompanied at all times whilst they are on the school site. Staff assigned are required to monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the speech does not meet this requirement, immediate action must be taken by the member of staff to balance the information given and this must be reported to a Senior Teacher immediately after the talk/visit.

Post speech/ visit evaluation The speech/ visit is evaluated by the organiser as to whether it met the needs of our students. Should the visit/speaker not meet the needs of our students then this will be clearly communicated to the visiting speaker/institution. These must be arranged by the organising member of staff who originally invited the speaker.

We are very grateful to have a wide range of visiting speakers coming to The Swaminarayan School to share their thoughts, ideas and experiences. We would draw your attention to the following guidelines for all visiting speakers:

- *Please be aware of the Hindu Ethos on which the school is based*
- *Please be aware that as a school we are fully supportive of fundamental British values, which include democracy, the rule of law, individual liberty and mutual respect and a tolerance of those with different faiths and beliefs.*
- *Please understand that The Swaminarayan School does not intend to offer a platform for individuals who might espouse racist, homophobic, sexist, ageist or extremist views or anyone who might be trying to incite young people to violence or extremism of any form.*

Having said this, we welcome people of all backgrounds, ethnicities, beliefs and experiences and we look forward to hearing what you have to share with us.

Appendix 6

Radicalisation and Extremism Risk Assessment

Does the school have a policy?

Yes Safeguarding policy with section specifically addressing radicalisation.

Does the school work with outside agencies on radicalisation and extremism e.g. Channel? No We would if we had a concern raised. Channel is referred to in the Safeguarding policy.

Have staff received appropriate training? Yes. Online modules completed January 2016 in Channel Awareness. DSL Training in Radicalisation.

Has the school got a trained Prevent Lead? Yes It is the DSL. The DSL has completed an Online Prevent Course provided by the Home Office. Further Training to take place in Autumn 2017.

Do staff know who to discuss concerns with? Yes. DSL Specified in SG policy and staff were reminded during meetings.

Is suitable filtering of the internet in place? Yes. DSL discussed filtering with Computing Manager from NK Computers and is assured that appropriate filters are in place.

Do children know who to talk to about their concerns? Yes Information displayed in Learning areas.

Are there opportunities for children to learn about radicalisation and extremism? Limited but yes. Work in progress. Units are being enhanced for the PSHCE programme.

Have any cases been reported? No, no referrals to date

Are individual pupils risk assessed? No. Individuals pupils would be assessed and monitored if suspicions were raised. When appropriate the concern would be reported to Channel.

What factors make the school community potentially vulnerable to being radicalised? (e.g. EDL local base, extreme)? Predominantly Hindu population within the school but risk of out of school or online exposure religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents)

Comment on the school's community, locality and relevant history. Co-educational independent school with no defined catchment area located in a urban location thus no major influence from local community groups. Good Hindi ethos with children of other faiths also present (eg, Staff children). Clear evidence of absolute integration amongst friendship groups throughout the school and trips to other places of worship among the main faiths across Year groups.

Risk evaluation: Low

Way Forward

Monitor influence of online and external groups.

Monitor pastoral issues for trends in marginalization and isolation

Date completed..... Signed.....

Appendix 7

STAFF CODE OF CONDUCT IS CONTAINED IN THE Department of Schools, Children and Families DOCUMENT

- 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings'.

<http://www.safeguardingschools.co.uk/wp-content/uploads/2013/06/Guidance-for-safer-workingpractice-for-adults-who-work-with-children-and-young-people.pdf>

A summary of the key points

Staff should be guided by the following advice in an attempt to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid physical contact with pupils unless absolutely necessary. There are occasions when physical contact with a child may be proper or necessary, for example to demonstrate exercises or techniques during sports lessons. However, staff should always be able to justify why they made physical contact in any situation and the nature of the contact should be limited to what is appropriate
- Avoid being alone with a pupil if possible. There will be occasions when a confidential interview or a 1:1 meeting is necessary, but, where possible, such interviews should be conducted in a room with visual access, or with the door open, or in a room or area which is likely to be frequented by other people, and another pupil or adult should be present or nearby.
- Maintain a professional tone and attitude when talking to students, avoiding overly personal comments, sarcasm, demeaning or insensitive comments and avoiding over-friendliness. Comments on a student's appearance should only be made in reference to an infringement of the dress code.
- Avoid discrimination against, or favour particular children to the exclusion of others.
- Never condone, or participate in, the behaviour of children which is illegal, unsafe or abusive
- Ensure that dress is appropriate to the formal environment in which you are working; clothing which could be seen as provocative should be avoided
- Staff are advised wherever possible not to transport pupils singly (eg in a car or minibus).
- Staff should be particularly careful when supervising pupils in extra curricular activities, residential trips or Duke of Edinburgh expedition. Typically a less formal approach than usual is appropriate in these settings, but that can be open to misinterpretation. Although a more informal approach is usual in such circumstances, the standard of behaviour expected of staff will be no different from that expected within school.
- Alert the Headteacher or member of the safeguarding team if you feel a student is taking too personal an interest in you.
- The school operates a whistle blowing procedure by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff have a responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

Social media and other communication

Staff should never communicate with pupils through their own mobile phone number or email address: any necessary communication should be through school numbers and addresses which are monitored. For trips and visits, sports fixtures and day events, staff are asked under normal circumstances to use a School mobile phone for all communication with students and parents.

- Staff should also ensure that any social networking sites they use have the tightest security settings; school students should not be accepted as friends.)
- Staff should not use personal mobile devices to take and store images of children in a school setting.

Appendix 8 – Forms for Visiting Speaker

The School will ensure that any visiting speakers who might fall within the scope of the Prevent duty, whether invited by staff or pupils, are suitable and appropriately supervised. Our responsibility to our students is to ensure that the information they receive is aligned to the values of our School and British values which include democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Further guidelines and information can be found in our Safeguarding policy: 5.3 Visiting Speakers

Staff organiser:

Name of the Speaker: Institution:.....

Subject of the visit:

Year group involved: Date of the visit:.....

- | | | |
|---|-------|------|
| 1. Outside speakers discussed with the Head Teacher | Yes · | No · |
| 2. Biography of the speaker or institution provided <u>and attached</u> | Yes · | No · |
| 3. Assurances that all information communicated by the visitor will be lawful | Yes · | No · |
| 4. Internet search on visitor/speaker completed <u>and attached</u> | Yes · | No · |
| 5. Conversation with speaker regarding the content of the speech, including an understanding that their presentation will be brought to an early end if the content proves unsuitable | Yes · | No · |
| 6. Head Teacher's permission for fundraising, if applicable | Yes · | No · |
| 7. <i>Visiting Speaker Guidelines*</i> sent out to the speaker · *these can be found in 7a safeguarding policy 5.3 | Yes · | No · |
| 8. Permission from Head Teacher granted | Yes · | No · |

Organiser's signature Date:

Head Teacher's signature: Date:

I agree to abide by the school's equality commitments; that there will be no statements which might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs; and there will be no extremist material.

Guest Speaker's signature:: Date:

Visiting Speaker Evaluation Form

Please complete this form and hand to the DSL

Speaker, subject, and date of visit:

Organising teacher:

Feedback from staff:

Any contentious subject areas or comments:

Would you book the speaker again in the future? Why or why not?

Any other comments?

Organiser signature and date:

Appendix 9 - Youth Produced Sexual Imagery (Sexting)

Commonly referred to as “Sexting”. The term “Youth Produced Sexual Imagery” has been taken from the guidance on 'Sexting in Schools and Colleges' (2016) and our policy has encompassed reference from these recommendations.

This term has been used to avoid the confusion between sexual images being sent as opposed to writing and sharing explicit messages and focusses on images being sent. Written messages are dealt with separately but are still a concern and should be referred to the DSL who will investigate and determine further actions in line with the school’s safeguarding and e-safety policy.

Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically, it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under 18s is also illegal.

Although the production of such imagery will likely take place outside of school and college, these issues often manifest in schools, colleges and organisations working with children and young people. Schools, colleges and other organisations need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated.

This advice aims to support schools in developing procedures to respond to incidents involving youth produced sexual imagery. It also signposts sources of resources and support.

These procedures should be part of a school’s safeguarding arrangements and all incidents of youth produced sexual imagery should be dealt with as safeguarding concerns.

Crime recording

Where the police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a ‘crime’ and the young person involved will be listed as a ‘suspect.’

This is not the same as having a criminal record.

Outcome 21

As of January 2016 the Home Office launched a new outcome code (Outcome 21) to help formalise the discretion available to the police when handling crimes such as youth produced sexual imagery. Outcome 21 states:

Further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a police decision.

This means that even though a young person has broken the law and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

Consequently, schools and colleges can be confident that the police have discretion to respond appropriately in cases of youth produced sexual imagery and to record incidents in a way which should not have a long term negative impact on young people.

Initial response

All incidents involving youth produced sexual imagery should be responded to in line with the school's safeguarding and child protection policy.

When an incident involving youth produced sexual imagery comes to a school or college's attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in school, or any member of the school or college staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or college, or inform the police directly.

All members of staff (including non teaching) are made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery.

Initial Review Meeting

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.

- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any pupil in the imagery is under 13/17
5. You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply then a school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support such as the Brent LSCB.

The decision should be made by the DSL with input from the Headteacher and input from other members of staff if appropriate. The decision should be recorded in line with school policy.

The decision should be in line with the school's child protection procedures and should be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people. The decision should be reviewed throughout the process of responding to the incident.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce

the imagery?

- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

Informing parents (or carers)

Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents themselves.

Reporting incidents to the police

If it is necessary to refer to the police, contact should be made through existing arrangements. This may be through a safer school's officer, a PCSO (Police Community Security Officer), local neighbourhood police or by dialling 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view

the images.

- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

The Searching, Screening and Confiscation advice highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery.

Interviewing and talking to the young person/people involved

Once a school has assessed a young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL should carry out this conversation. However, if the young person feels more comfortable talking to a different teacher, this should be facilitated where possible.

Recording incidents

All incidents relating to youth produced sexual imagery need to be recorded in school or college. This includes incidents that have been referred to external agencies and those that have not.

How we teach young people about youth produced sexual imagery?

Our PSHCE and ICT Curriculum together with events such as Safer Internet Days teach children the importance of information and image sharing. A summary of curriculum plans for both prep and senior school cover the risks associated and information on how to report concerns.

Further information and guidance is available from the UKCCIS Guidance on 'Sexting in Schools and Colleges' (2016).

Trafficking

Recent media attention has been placed on the need to identify children who may have been Trafficked. The following guidance has been given following the publication of *Safeguarding children who may have been trafficked – Practical Guidance (DfE)*.

Possible indicators that a child may have been trafficked are highlighted below:

- possesses money and goods not accounted for;
- is malnourished;
- is unable to confirm the name and address of the person meeting them on arrival;
- has had their journey or visa arranged by someone other than themselves or their family;
- is accompanied by an adult who insists on remaining with the child at all times;
- is withdrawn and refuses to talk or appears afraid to talk to a person in authority;
- has a prepared story very similar to those that other children have given;
- exhibits self-assurance, maturity and self-confidence not expected to be seen in a child of such an age;
- does not appear to have money but does have a mobile phone; and/or
- is unable, or reluctant to give details of accommodation or other personal details.

Reasons to suspect an adult may be involved in trafficking include:

- has previously made multiple visa applications for other children and/or has acted as the guarantor for other children's visa applications; and/or
- is known to have acted as the guarantor on the visa applications for other visitors who have not returned to their countries of origin on the expiry of those visas. Whilst resident in the UK (in addition to those listed above)

Additional indicators for the child

- receives unexplained/unidentified phone calls whilst in placement/temporary accommodation;
- shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy;
- has a history with missing links and unexplained moves;
- has gone missing from local authority care;
- is required to earn a minimum amount of money every day;
- works in various locations;
- has limited freedom of movement;
- appears to be missing for periods;
- is known to beg for money;
- performs excessive housework chores and rarely leaves the residence;

- is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good;
- is one among a number of unrelated children found at one address;
- has not been registered with or attended a GP practice;
- has not been enrolled in school;
- has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings;
- is permanently deprived of a large part of their earnings by another person; and/or
- is excessively afraid of being deported.

The indicators above should not be read as a definitive list and practitioners should be aware of any other unusual factors that may suggest a child might have been trafficked. They are intended as a guide, which should be included in a wider assessment of the young person's circumstances.

It is also important to note that trafficked children might not show obvious signs of distress or abuse and this makes it difficult to identify children who may have been trafficked. Some children are unaware that they have been trafficked, while others may actively participate in concealing that they have been trafficked.

Referral of Trafficked Child

Concerns by a Staff member should be made to the Designated Safeguarding Lead who in turn determines contact with the Local Safeguarding Board (eg Brent Family Front Door) with concerns about whether a child may have been trafficked, the local authority should decide on a course of action within 24 hours. In these circumstances prompt decisions may be required and Child Protection procedures to immediately protect the child from harm.

Useful Contacts for additional advice

NSPCC Child Trafficking Advice and Information Line (CTAIL)

The NSPCC Child Trafficking Advice and Information Line²⁵ provides advice and information to professionals across the UK in statutory and non-statutory services. They work together with other professionals, giving social work and police advice where there are concerns that a child may have been trafficked. CTAIL offer professionals free awareness-raising presentations, one-off advice on the telephone, or can open a case and provide ongoing support in the form of consultation. They make referrals to other agencies, attend meetings and depending on the circumstances of the case, the practitioners complete trafficking assessment reports as directed by solicitors or other professionals. The practitioners also offer direct work for foster carers caring for trafficked children and have a large young people's participation group who work with CTAIL in providing knowledge and insight into child trafficking. Recently CTAIL became a NRM First Responder and can refer children directly into the mechanism.

A referral can be made to CTAIL by: Contacting their free phone number: 0800 107 7057 or emailing the team: CTAIL@nspcc.org.uk