WESTMINSTER UNDER SCHOOL

Policy on Safeguarding (Child Protection)

This Policy applies to the Early Years Foundation Stage (EYFS)

Written by:	MJW & HW
Version number:	Version 14.1
Effective date:	May 2026
Summary of changes:	KCSIE 2025 updates Safeguarding Team updates Inclusion of EYFS and co-education
Approved by:	Full GB via approval at Ed Comm
Related policies:	Anti-Abuse, -Bullying and -Discrimination Policy Behaviour, Rewards and Sanctions policy Data Protection policy e-Safety policy Safer Recruitment policy Staff Code of Conduct Pupil Registration and Attendance Policy Whistleblowing Policy Health and Safety Policy Equal Opportunities Policy Physical Contact and Physical Restraint Policy Remote Learning Policy Relationship and Sex Education (RSE) Policy Policy on Visitors Intimate Care Policy Mobile Phone Policy (EYFS)
Audience:	Governors, staff, parents
Last version:	V14.0
Last review date:	September 2025
Next review date:	Play term 2026
Person(s) in charge of review:	Deputy Master, Lower School

Key Personnel at Westminster Under School and Contact Details

School Safeguarding Personnel

The DSL and DDSLs of Westminster Under School can all be contacted using a single email address: wussafeguardingteam@westminster.org.uk, which we recommend using for all concerns about a child's safety or potential safety.

Individual members of the Safeguarding Team are:

Designated Safeguarding Lead ("DSL")
Hayley Wellman, Deputy Master, Lower School
Additional responsibility for Safeguarding in EYFS and Senior Attendance Champion
E: hayley.wellman@westminster.org.uk
T: 0207 802 0394

Deputy Designated Safeguarding Leads ("DDSLs"):
Tom Dumas, Assistant Director of Sport
E: thomas.dumas@westminster.org.uk
T: 0207 802 0382

Peter Lawson, Head of Years 5 & 6, Head of TPR
E: peter.lawson@westminster.org.uk

Harriet Lindley, Acting Assistant Master, Pastoral
E: harriet.lindley@westminster.org.uk
T: 0207 802 0585

Key School Personnel

The Master (and as the first point of contact for all concerns regarding members of staff)
E: michael.woodside@westminster.org.uk

Chair of the Governing Body (and as the first point of contact for concerns about the Master):
Mark Batten
E: chairofgovernors@westminster.org.uk

Designated Safeguarding Governor:
Dr Sarah Anderson
E: sarah.anderson@westminster.org.uk

Attendance Lead:
Hayley Wellman
E: hayley.wellman@westminster.org.uk

School Counsellor:
Tess Bhokanandh
E: tess.bhokanandh@westminster.org.uk

External safeguarding contact details

Anyone with a concern about a child can make a referral to the Bi-Borough Local Safeguarding Children Partnership (LSCP):
https://www.rbkc.gov.uk/sharedservices/lscb.aspx

Westminster's Local Authority Designated Officers (LADO) (who deal with allegations against staff working in schools):
E: lado@westminster.gov.uk

Named LADO:
Aqualma Daniel
E: adaniel@westminster.gov.uk
T: 07870 481 712

Westminster Children's Services:
E: accesstochildrensservices@westminster.gov.uk
T: 020 7641 4000 (out of hours 020 7641 6000)

Westminster Prevent Team:
Julie Knotts
E: jknotts@westminster.gov.uk
T: 07817 054 759

Police:
Dial 999 in emergency or 101 in other non-emergency circumstances

DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors on 'preventing extremism in schools and children's services' is:
T: 020 7340 7264
E: counter.extremism@education.gov.uk

Advice can be sought at any time from the NSPCC helpline.
T: 0808 800 5000
E: help@nspcc.org.uk

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Introduction

Vision

Westminster Under School is totally committed to the welfare of all members of its community so that they grow, flourish and reach their potential. We seek to provide a safe and nurturing environment in order to achieve this.

The principle of safeguarding pupils is at the core of the School's foundation and all members of the school community should see this as their most important duty, both within the School's environment and beyond it. In particular, all members of the community are expected to be alert to the predicaments and needs of others, as well as to support each other at all times.

To this end, whilst policies regulate our activities, we look to work far beyond that, so that Safeguarding and wellbeing of our pupils form the heart of the School's ethos.

Overview

Westminster Under School ("the School") makes its Safeguarding Policy available to anyone. Members of staff are required to read it and confirm that they have understood it. The School ensures that it is implemented in full.

The policy is updated annually, or more frequently if required (e.g., where there is a change in legislation). It is provided to all staff and published on the staff intranet. Children and parents are informed of the policy which is also published on the School's website.

This policy applies to all individuals working at or for Westminster Under School ("the School"), including all teaching and non-teaching staff, residential and part-time staff, supply staff, governors, volunteers and contractors. All references to "staff" in this policy should be interpreted as relating to the aforementioned groups unless otherwise stated. This policy will also apply to parents of pupils, when they are on school premises or otherwise involved with school business, for example accompanying a school trip. It also applies to any staff, spouses or visitors who are resident in accommodation that is linked to a School building where pupils may be.

The Governing Body and staff of the School fully recognise that safeguarding is everyone's responsibility; that all staff and pupils have a role to play in safeguarding children and providing a safe environment in which children can learn. We do this by promoting the physical, mental and emotional health and safety of our pupils, and by recognising the importance of the School as a source of stability in the lives of all its pupils, but particularly those children who have suffered or who are at risk of harm. We seek to ensure that issues relating safeguarding and child welfare are always addressed.

The School also works to create an environment where pupils, parents and staff feel able to raise concerns and where staff feel supported in feeling that safeguarding is everyone's responsibility and that everyone

has a role to play: it is not '*someone else's job*'. This is encouraged through training, the ethos of having Safeguarding at the very heart of what we do, the continual raising of the various Safeguarding policies and procedures that the School has put in place and the raising of issues relating to Safeguarding in a local or national context.

The School operates on the basis of a co-ordinated and child-centred response to all safeguarding concerns, working in partnership with parents as far as possible. This means that staff should always consider what is in the best interests *of the child*.

As the School becomes a co-educational environment, safeguarding education and pastoral practice continue to promote respectful behaviour and healthy relationships between boys and girls. All Safeguarding policies and procedures apply equally to girls as well as boys.

Definition: Safeguarding

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Definition: A Child

In English law, a child is "anyone who has not reached his or her 18th birthday".

Contextual Safeguarding

The School is aware that abuse can happen in any organisation and in many different contexts and as such, the School understands and acknowledges the value of Contextual Safeguarding.

Contextual Safeguarding is an approach to understanding, and responding to, the possibility of children experiencing significant harm beyond their families and the School setting. It is also possible for this to occur between children outside of these environments.

Contextual Safeguarding recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. As such, children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Parents and carers sometimes have little knowledge and/or influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, we recognise that we need to engage with individuals and sectors who do have influence over or within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Therefore, we seek to expand the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts beyond School and family.

Working with Parents

The School seeks to build effective partnerships with parents wheresoever it is possible. The fundamentals of this include:

- Building strong, positive, trusting and cooperative relationships
- Respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents
- Empowering parents to participate in decision-making by equipping them with information, keeping them updated and directing them to further resources
- Involving parents in the design of processes and services that affect them

Terms of reference – External Documentation

This policy complies with the following key documents:

- Keeping Children Safe in Education (HM Government, September 2025)
- Working Together to Safeguard Children (HM Government, March 2026)
- Teachers' Standards (HM Government, July 2011 onwards)
- Independent School Standards Regulations (HM Government, April 2026)
- Safeguarding and protecting people for charities and trustees (The Charity Commission, December 2017)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)
- Prevent Duty Guidance for England and Wales (HM Government, July 2023)
- When to Call the Police: Guidance for Schools and Colleges (National Chief Police Council, February 2020)
- *Children Missing Education* (HM Government, September 2024)
- The Independent School Standards: Guidance for Independent Schools (HM Government, April 2026)
- Teaching Online Safety in Schools (HM Government, January 2023)
- Filtering and monitoring standards for schools and colleges (HM Government, March 2023)
- Inspection Framework: Framework for the inspection of association independent schools, including residential (boarding) schools and registered early years settings (Independent Schools Inspectorate, September 2024)
- Harmful online challenges and online hoaxes (HM Government, February 2021)

- The Prevent Duty: Safeguarding learners vulnerable to radicalisation (HM Government, October 2022)
- Gender Questioning Children – draft for consultation (HM Government, December 2023)
- Inspection Handbook: Handbook for the inspection of association independent schools, including residential (boarding) schools and registered early years settings (Independent Schools Inspectorate, December 2024)
- Working together to improve school attendance (HM Government, August 2024)
- Generative AI: product safety expectations (HM Government, January 2026)
- Filtering and monitoring standards for schools and colleges (HM Government, March 2025)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (HM Government, July 2025)
- Early Years Foundation Stage Statutory Framework for Group and school-based providers (2025)

This list is not exhaustive and due regard is given to a wide range of other important documents published by HM Government and other leading bodies.

This policy will be updated on an as-needed basis, referencing any updates to the documentation above or new advice published by His Majesty's Government or the Local Authority, for example.

Terms of Reference – Internal Documentation

This policy is linked with a number of other key school documents:

- Anti-Abuse, -Bullying and -Discrimination Policy
- Behaviour, Rewards and Sanctions Policy
- Data Protection Policy
- e-Safety Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Intimate Care Policy
- Mobile phone policy for EYFS
- Physical Contact and Physical Restraint Policy
- PHSEE Policy (which contains details of the School's RSE programme)
- Remote Learning Policy
- Recruitment Policy
- RSE Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Supervision of Pupils Policy (incorporating Policy on Pupil Attendance)
- Whistleblowing Policy (by staff and by volunteers)

This list is not exhaustive and all of the School's policies have some bearing on the welfare, health and safety of our pupils.

The Designated Safeguarding Lead and Deputies

The School appoints a Designated Safeguarding Lead (DSL) who is a member of the School's senior management team and who takes lead responsibility for safeguarding and child protection. The DSL receives full training before taking up the role and attends further training sessions every two years as well as keeping up to date with safeguarding developments regularly, and at least annually. Additionally, the DSL undertakes Prevent awareness training.

There are also three Deputy DSLs appointed who are trained to the same level as the DSL and can act appropriately when safeguarding issues arise if the DSL is unavailable. The DSL and DDSLs' contact details are on page 2 of this document.

During term time the DSL or a Deputy DSL will always be in school during school hours. The details of the members of this Safeguarding Team are on page 6 of this policy. If in exceptional circumstances the DSL or a Deputy DSL are not available, this should not delay appropriate action being taken. Staff should consider speaking to the police if the child is in immediate danger and/or take advice from Children's Services in the local authority where the child lives. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Do not speak to other adults or children about the matter.

While the DSL can delegate some safeguarding responsibilities to the deputies, the ultimate responsibility for safeguarding, including e-Safety, lies with the DSL. Annex C of KCSIE (September 2025) outlines the duties of the DSL (including eSafety) which are also set out in the DSL's job description.

The DSL and the DDSLs, as well as other senior leaders within School, are additionally expected to be familiar with Annex B of the latest KCSIE advice.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads at Westminster School

Westminster School, with pupils from Fifth Form to Remove (Years 9 to Year 13) and associated teaching, admin and support staff, share a number of facilities with the Under School, for example, Vincent Square playing fields and the Sports Centre (Lawrence Hall). It is therefore entirely possible that members of WUS staff might have a Safeguarding concern about a pupil of Westminster School, and need to report that concern to the DSL there or, equally, that predominantly Westminster School-based staff may have a concern about a pupil at Westminster Under School and need to report that concern to the Under School's DSL. While both Schools have separate policies, both School's Safeguarding policies follow a similar structure.

So that all members of staff from both Schools are familiar with both sets of DSLs, this is additionally reinforced at the start-of-year Safeguarding Updates for all members of staff at both Schools. They are also named within this policy (signed as read and understood by all members of staff across the entire charity) and also as part of initial Safeguarding training for all members of staff.

Appendix H of this policy has the names and contact details of the DSL and the DDSLs at Westminster School.

Undertakings

Principles

The School's primary focus is the protection of its pupils, and seeks to provide a caring, safe and positive environment in which each individual child can grow and flourish, develop their own particular talents, and thereby find enjoyment and fulfilment. To this end:

- The School will support every pupil's development in ways that will foster their sense of security, confidence and independence, and in a manner that has respect for the dignity, privacy and beliefs of all, and which does not discriminate on the basis of gender, ethnicity, beliefs, race, culture, religion, caste, sexual orientation or disability. Further details are outlined in the Policy on Behaviour, Rewards and Sanctions.
- The School recognises that the welfare of the child is paramount. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs; all children without exception have the right to protection from abuse.

Leadership

The Governing Body will ensure they facilitate a whole-school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Recruitment

The School will comply fully with the Government's published policies on safer recruitment, making the appropriate checks on all staff (including governors, employees, volunteers and contractors), including through the Disclosure and Barring Service (DBS) and by obtaining and following up thorough references.

Assurance is obtained that appropriate suitability checks apply to any staff employed by another organisation who might be working onsite (such as building or service contractors) and to any individual working with the School's pupils (such as after school clubs) or on an external site (such as on school visits). Any individual working on our School site, and/or off-site with our pupils, for whom an enhanced DBS check with the barred list has not been obtained will not be allowed to work in regulated activity and will be supervised by School staff at all times.

The School's safer recruitment procedures are set out in full in the School's Policy on Safer Recruitment. These comply with Part 3 of KCSIE (September 2025), the Safeguarding Vulnerable Groups Act 2003 and other relevant safer recruitment guidance to ensure that no-one is employed within, by or on behalf of the School who is unsuitable to work with children.

Training

The School trains all staff, volunteers and governors, regardless of their role, to be vigilant and watchful for, and aware of, signs that a child may be in need of help as well as the signs of abuse, neglect and exploitation.

To this end, all staff members receive appropriate safeguarding and child protection training which is regularly updated in line with the Bi-Borough LSCP's guidance. In addition, all staff members receive safeguarding and child protection updates (via email and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff. Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning.

As part of the training requirements, acknowledgement will be made of the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:

- this policy (which includes procedures to deal with child-on-child abuse);
- Keeping Children Safe in Education (September 2025) Part 1 for adults working directly with children including Annex B for school leaders and those who do work directly with children.
- the Staff Code of Conduct;
- the Low-Level Concerns Policy;
- *What to do if you're worried a child is being abused – advice for practitioners* (March 2015)
- the Whistleblowing Policy;
- the Anti-Bullying, -Abuse and -Discrimination Policy;
- the Policy on Behaviour, Rewards and Sanctions;
- the Safeguarding response to children going missing from education; and
- the role of the DSL.

Staff are obliged to sign to note they have read and understood the relevant sections of KCSIE, this policy, the Staff Code of Conduct, the Behaviour, Rewards and Sanctions Policy and the Whistleblowing Policy.

The initial training for all new staff will cover a number of aspects, including but not limited to:

- Part 1 of *KCSIE*, this policy and the Staff Code of Conduct
- Contact details if they have a concern about the safety or welfare of a child, or a concern about the behaviour of an adult
- The signs that a child may be in need of Early Help or additional support, at risk of harm or suffering from harm
- Indicators of abuse, neglect and exploitation and specific safeguarding issues
- What to do if a child discloses abuse, including that confidentiality should never be promised and to avoid asking leading questions
- How to escalate concerns about a child and allegations of abuse
- Inter-agency working, including in the context of a referral made to Children's Social Services and / or the LADO, the statutory assessment process and that the staff member may be asked to contribute to a child protection strategy meeting

- Early Help
- Child-on-child abuse
- Managing a report of child-on-child sexual violence and sexual harassment
- Prevent strategy
- Online safety, including expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Information sharing
- Guidance for all staff on boundaries and appropriate behaviour, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on)
- The existence and whereabouts of this policy, other relevant policies and safeguarding documentation including Local Authority procedures.

All staff are obliged to re-read and understand at least KCSIE Part 1 (and Annex A for adults working directly with children) each time it is updated by the DfE, and are told of updates by the DSL and Deputy DSLs. Mechanisms to assist them in understanding KCSIE include regular updates in staff meetings, links to news items on the staff e-Noticeboard, the issuing of the wallet-sized pink safeguarding cards (see Appendix A below) and short online quizzes to ensure new changes have been understood.

Communications and sharing information internally

The School emphasises the need for good levels of communication between all members of staff to ensure that a structured procedure for the safeguarding of children will be followed in cases of suspected abuse. (See Appendix C below) The School recognises the importance of information sharing in protecting children from harm and promoting children's wellbeing: the danger of not sharing information is highlighted in a number of serious case reviews. The School shares information in accordance with the General Data Protection Regulations (2018) and the guidance set out in Chapter 1 of *Working Together to Safeguard Children* (March 2026) and in *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* (May 2024).

The School also recognises that it plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults within an ethos built upon care, support and protection. To this end, all pupils (and members of staff) will have access to the document 'How to Stay Safe' (shown in Appendix G), which sets out a variety of members of staff and other adults or organisations who can be contacted if pupils are worried or in difficulty. This document is also discussed at the start of the year in assemblies, in form periods and is published on the pupil area of Aptus.

The DSL works with colleagues to ensure that pupils are aware that:

- Systems are in place, are well promoted, are easily understood and easily accessible to pupils;
- They can confidently report abuse, knowing that their concerns will be taken seriously; and
- They can express their views safely and give feedback.

The DSL is trained on the above guidance and works with staff to ensure that:

a) fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of children;
b) they understand and follow this guidance; and
c) they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.

The School provides a systematic means of identifying and supporting all children who are suspected of being in need of Early Help or additional support, or at risk from harm, and of handling such cases appropriately in line with the procedures set out below.

The School will ensure full written records of all child protection procedures are maintained and stored confidentially. All concerns, disclosures or allegations, decisions and subsequent actions will be recorded securely and confidentially. All discussions, the decisions made and the reasons for these decisions will be recorded.

Training Pupils about Safeguarding

The School will train those pupils in a position of pastoral responsibility, e.g., School Prefects and House Officials, and indeed all Year 8 pupils who might hear of younger pupils at risk or in danger, in basic safeguarding procedures. They will have clear guidance that their role is to listen, not to investigate and not to 'keep secrets' but to refer the matter to a member of the Safeguarding Team if they receive any allegations of abuse or anything which makes them uncomfortable.

Within the School's PSHEE programme, the Computing Programme of Study, during Church addresses and assemblies, and elsewhere in the curriculum, pupils are taught key safeguarding issues including but not limited to:

- Addressing appropriate and inappropriate behaviours (in line with the PSHE curriculum);
- Safety online (see the eSafety Policy);
- The dangers of radicalisation (within the PSHEE curriculum);
- Relationships and Sex Education (in line with the School's RSE Policy), including issues surrounding consent to sexual acts.

Communications and sharing information externally

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. The School has clear powers to share, hold and use information for these purposes.

The School will work closely with feeder and successor schools, as well as any of the three Safeguarding Partners (the Bi-Borough LSCP; the clinical commissioning group and the area chief officer of Police) and any appropriate agencies, so as to act in the best interests of the child and thereby safeguard and promote the welfare of children, including identifying and responding to their needs.

In addition, the School follows Charity Commission guidance on charity and trustee duties to safeguard children and liaises with the Charity Commission, where appropriate.

Disclosures

Pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking out if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with pupils which facilitate communication.

Feeder Schools and Successor Schools

The School will request safeguarding information from feeder schools and nurseries, using an online form. We endeavour to hear from all schools, wherever possible, and will follow-up where responses are not immediately forthcoming.

Where pupils move to new schools, any child protection files will be transferred securely, separately from their main file, and a confirmation of receipt will be requested. The retention and destruction of files will be in accordance with the School's Data Protection Policy.

Multi-agency working

The School recognises that it has a pivotal role to play in multi-agency safeguarding arrangements, in line with the statutory guidance published in *Working Together to Safeguard Children* (March 2026), as well as, but not limited to the Safeguarding Partners' threshold documentation and assessment procedures. Information will be shared securely with other professionals and local agencies.

In particular, the aim, when working with other practitioners is to:

- Share the same goals
- Learn with and from each other
- Ensure that all parties have the information and support needed to help families
- Acknowledge and appreciate difference
- Challenge each other

This will ensure that everyone understands the risks of harm and ensures that families receive timely support.

If the School is named as a "relevant agency", the School recognises that it is under a statutory duty to cooperate with the published arrangements of the safeguarding partners. This includes providing a coordinated offer of Early Help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

The School will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct a Section 17 or a Section 47 assessment.

In order to allow any assessment to consider all the available evidence and enable a contextual approach to address such harm, the School will provide as much information as possible as part of the referral process

When the School is supporting the Local Authority and/or the Police, the School will uphold its responsibilities to ensure that an "appropriate adult" is required to be present whenever a child is being questioned or detained by the Police. The appropriate adult will support, advise and assist the young person, and also "observe whether the police are acting properly and fairly to respect [the young person's] rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not in line with expectations outlined in Pace Code C" (HM Government, August 2019).

Data Protection

Written safeguarding records count as "special category personal data" under the *General Data Protection Regulation and Data Protection Act* (HM Government, 2018): they neither prevent nor limit the sharing of information for the purposes of keeping children and young people safe.

The School acknowledges that "safeguarding of children and individuals at risk" is a processing condition that allows it to share "special category personal data". This circumstance includes allowing practitioners to share information without consent where there is good reason so to do. Where the sharing of information in a timely manner will enhance the safeguarding of a child, but it is not possible to gain consent, or it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk, then the School may release information if it is considered to be in the best interest of a child.

Where sharing information would result in the serious harm test being met, then the School will withhold providing the data in compliance with the School's obligations.

Parents who ask to see records may be allowed access, provided this does not put children at risk and that any questions of the child's consent are satisfied.

Ultimately, *General Data Protection Regulation and Data Protection Act* (HM Government, 2018): do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Human Rights Act and Equality Act

The School recognises its responsibilities to respect and protect an individual's human rights when they make individual decisions about them, such that it will support pupils with regard to particular protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)

- Religion or belief
- Sex
- Sexual orientation

The School will take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.

The School acknowledges that the Public Sector Equality Duty (PSED) places a general duty on schools and colleges to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. This means that whenever significant decisions are being made or policies developed, specific consideration will be given to the equality implications of these.

Visitors

The School receives visitors regularly for the educational benefit of its pupils, e.g., visiting speakers, nurses administering HPV vaccinations and parent volunteers who assist in the Library on an occasional basis.

Because of this, all visitors have to be approved by the Deputy Master in advance of their visit and must not be left unaccompanied at any time. They are given information about the School: a précis of the School's procedures and told what is expected of them while on site (e.g., bringing photo ID, wearing a visitor's lanyard at all times, etc.) in advance of their visit. The School's Policy on Visitors gives full information on the policy and procedures around visitors.

Any visiting speakers to the School will be vetted by a Deputy DSL, and a record kept by them, in order to prevent extremist views being expressed without challenge, as per the Prevent duty.

Use of the School's Premises for non-School Activities

When services or activities are provided by the School under the direct supervision or management of the School's staff, the School's arrangements for child protection will apply.

When the School rents out its facilities and/or premises to organisations or individuals, the School is responsible for ensuring that appropriate arrangements are in place to keep children safe. Assurance will be sought that the provider has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) by the completion of risk assessments; these will be presented to the Bursar's Secretary who will co-ordinate the checking arrangements.

The School will ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

If the School receives an allegation relating to an incident that happened when an individual or organisation has been using the School's premises for the purposes of running activities for children, the School will follow its own processes and procedures, including informing the LADO.

Contextual Challenges

All children need to be protected, but some groups of children are potentially at greater risk of harm than others, both online and offline.

Children with Special Educational Needs or Disabilities

Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by bullying – without outwardly showing any signs;
- Communication barriers and difficulties overcoming these barriers.

The Learning Development department works with these pupils and help to identify such barriers; these staff provide another opportunity, in addition to those available to all pupils, for these children to raise safeguarding concerns.

Children in the Early Years Foundation Stage (EYFS)

The School recognises that children in the Early Years Foundation Stage are particularly young and may be more vulnerable. Safeguarding arrangements for Reception are implemented in accordance with the Statutory Framework for the Early Years Foundation Stage as well as the principles set out in this policy.

The School has a designated member of the safeguarding team with responsibility for the Early Years Foundation Stage.

Mobile Devices in the Early Years Foundation Stage

The use of personal mobile devices, including any devices with imaging or sharing capabilities, is prohibited on school premises and during off-site school visits. Wrist-worn smart watches, may be worn.

Early Years Staff Training

All Early Years Foundation Stage staff at Westminster Under School are trained in accordance with the requirements set out in Annex C of the Statutory Early Years Foundation Stage Framework (2025). Training for all EYFS staff is renewed at least annually. All EYFS staff are supported to embed their learning through continuous supervision, mentoring, and reflective practice. This ensures that safeguarding knowledge is effectively translated into everyday practice and that staff remain confident in their ability to recognise and respond to concerns.

The Designated Safeguarding Lead (DSL) undertakes training which fully meets the requirements outlined in Annex C of the Statutory Early Years Foundation Stage Framework (2025). The DSL provides

ongoing support, advice, and guidance to all EYFS practitioners in relation to safeguarding matters, both on a routine basis and in response to any specific safeguarding concern or incident as required.

Early Years Recruitment

Westminster Under School has full regard to the statutory guidance Disqualification under the Childcare Act 2006 and ensures compliance with all associated requirements. The School will not knowingly employ or engage any individual in the management of, or to work within, its childcare provision who is disqualified under this legislation. This includes all staff and volunteers working in the EYFS and in the School's Later Years Provision for children under the age of eight. All prospective staff members will be informed of the disqualification requirements prior to employment, and the school will maintain records of all disqualification checks on the Single Central Register (SCR). The school will obtain a reference for any member of staff working in the Early Years Foundation Stage (including students and volunteers) before they are recruited. The School will not accept open references (to whom it may concern). A reference will always be sought from the most recent employer where the applicant worked with children. If the applicant is not currently working with children, the school will seek a reference from the last employer where such work took place. If the applicant has never worked with children, a reference will be obtained from their current employer, training provider, or educational institution. The School will establish and document the reason for leaving the applicant's current or most recent post and will ensure that any safeguarding or conduct concerns are fully explored and satisfactorily resolved prior to confirming an appointment.

Looked After Children (LACs)

A Looked After Child is a child who is looked after by a local authority, subject to a care order or who is voluntarily accommodated by a local authority. The most common reason for children becoming looked after is as a result of abuse and/or neglect.

The School does not currently have any LACs but it may do in the future. All staff should understand how to keep LACs safe. Where a staff member comes into contact with an LAC, they will be provided with the information they need in relation to the child's legal status and contact arrangements with birth parents or those with parental responsibility. They will also be provided with the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him. The DSL takes the lead on all LACs and will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The DSL will convene a meeting with relevant teachers, e.g., Head of Year, Form Tutors, etc. in order to share relevant information on any LAC.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The School expects local authorities to share the fact that any of its pupils has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Elective Home Education

Where a parent has expressed their intention to remove a pupil from School with a view to educating at home, the School will support the coordination of a meeting between the Local Authority and other key professionals in order to coordinate a meeting with parents. Ideally, this would be before a final decision has been made, to ensure the parents have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Children requiring mental health support

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.

All members of staff have a duty to report concerns to Form Teachers, the Head of Year or the Assistant Master, Pastoral, who will then share concerns with the DSL as necessary. Referral to those trained in counselling and support (both internal and external) may then be made. Whole Staff Meetings and Briefings, Year Group Meetings and weekly Heads of Year meetings with the Assistant Master, Pastoral are all forums where pupils' profiles can be discussed. The DSL has a scheduled meeting at least weekly with other members of the Safeguarding team where pupils requiring mental health support can be discussed.

Children at Risk of Significant Harm, Abuse and Neglect (Level Four)

Level Four, the highest level of need, is defined by Section 47 of the Children Act 1989.

At this level, children are either suffering, or at risk of suffering, significant harm. Significant harm is caused when a child's health or development is seriously or permanently altered or damaged. Inflicting significant harm on a child, or failing to act to prevent it, is a definition of child abuse, neglect and exploitation.

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

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (for example, via the internet). They may be abused by an adult or adults, or another child or children.

Detailed symptoms, indicators and behaviours associated with child abuse can be found in *Child Maltreatment: when to suspect maltreatment in under-18s* (NICE, 2017) and a broader treatment is available in *What to do if you're worried a child is being abused: advice for practitioners* (HM Government, 2015).

Physical abuse

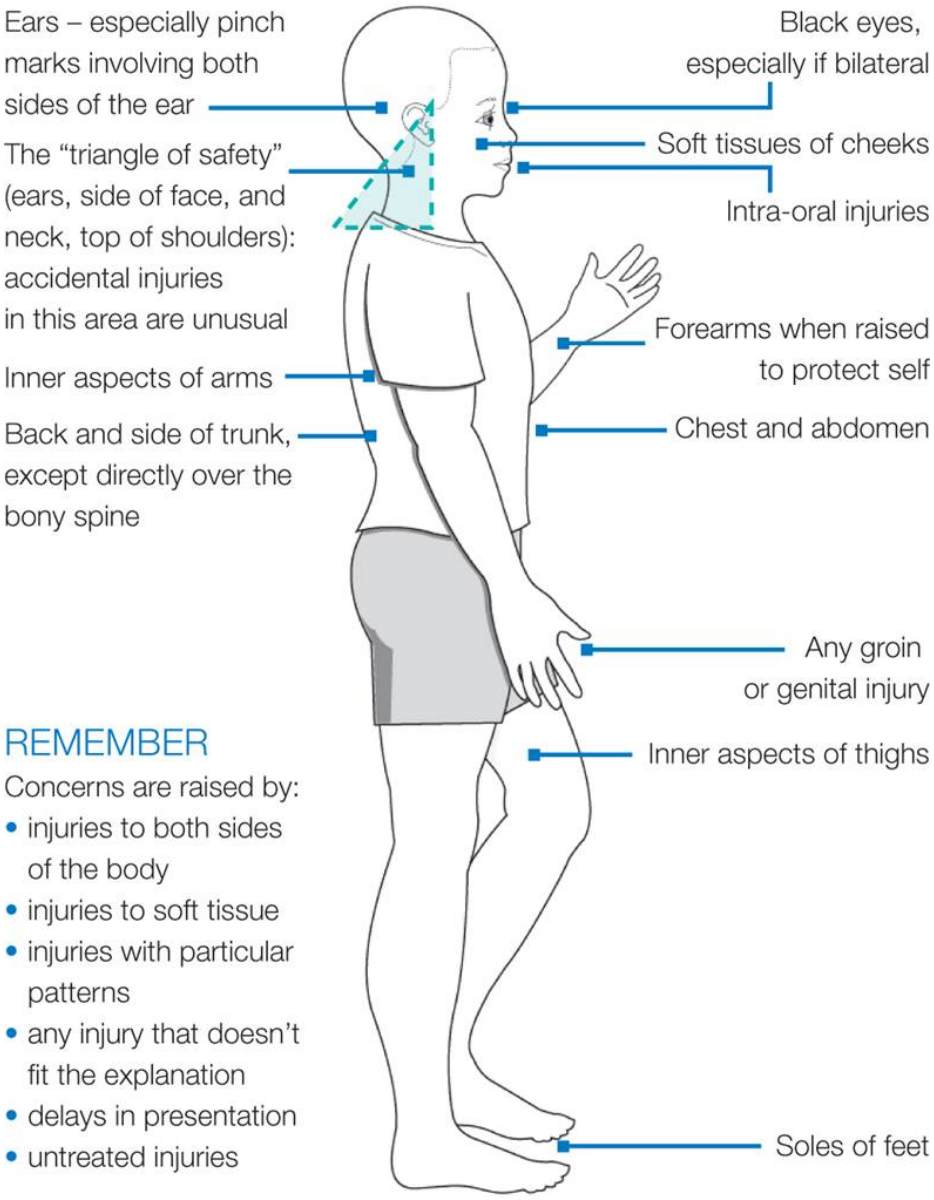
Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in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

Signs that may indicate Physical Abuse:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained:
  - bruises or cuts;
  - burns or scalds; or
  - bite marks.

Typical accidental injuries involve knees, shins, elbows, palms of the hands, chin and forehead. They are in keeping with any explanation given and the development of the child.

The body map below shows injuries which are less likely to have been caused accidentally and are therefore possible indicators of physical abuse.



Emotional abuse

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

Signs that may indicate Emotional Abuse:

Children:

- Overreaction to mistakes
- Lack of confidence/self-esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

Parents or carers:

- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'
- Blaming their problems on their child
- Humiliating their child, for example, by name-calling or making negative comparisons

Sexual abuse and Child Sexual Exploitation (CSE)

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

Signs that may indicate Sexual Abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you would not expect them to have;
- Children who ask others to behave sexually or play sexual games;
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy;
- Children who have sudden changes in behaviour and school performance;
- Children who self-harm, self-mutilation or attempts at suicide;
- Children who allude to secrets which they cannot reveal;
- Children who have a tendency to cling or need constant reassurance; and
- Children with a fear of undressing for gym activities.

Child Sexual Exploitation (CSE)

This a form of sexual abuse where children are sexually exploited for money, drugs, gifts, affection or status. It may involve:

- Physical contact activities:
  - Assault by penetration (e.g., rape or oral sex)
  - Non-penetrative acts (e.g., masturbation, kissing, rubbing and touching outside clothing

- Non-contact activities
  - 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 and may happen without the child's immediate knowledge (e.g.: through others sharing videos or images of them on social media). Child Sexual Exploitation does not always involve physical contact and can happen online.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited (e.g., they believe they are in a genuine romantic relationship).

Signs that may indicate CSE:

- Children who appear with unexplained gifts, money or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or don't take part in education; and
- Children who present with depression or are withdrawn.

Members of staff need to be aware that, under the Sexual Offences Act 2003, it is an "abuse of a position of trust", and thus a criminal offence, for someone working in a school to "groom" or engage in sexual activity with a pupil aged under 18. The consent of the pupil (or the agreement of his or her parents) is irrelevant. Staff should also note that, under the Serious Crime Act 2015, is it now a criminal offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a response which is sexual. A relationship between a member of staff and a pupil over the age of 18, or a recent former pupil, is almost certain to be judged inappropriate by the School and will lead to an assessment of that member of staff's suitability for work in an educational context.

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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, there are four different types of neglect:

Physical neglect

A child's basic needs, such as food, clothing or shelter, are not met or they are not properly supervised (including the use of inadequate care-givers) or they are not kept safe from physical and emotional harm or danger (this includes exclusion from home or abandonment).

Educational neglect

A parent does not ensure their child is given an education.

Emotional neglect

A child does not get the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them.

Medical neglect

A child is not given proper health care. This includes dental care and refusing or ignoring medical recommendations.

Neglect in Affluent Families

It is a common misconception that children who grow up in affluent families do not experience adversity and neglect. Particularly in affluent families, it is noted that there is an increased likelihood of four particular examples of ACEs:

- Emotional disconnect

  Parents may work long hours, leaving children in the care of paid carers which can (though not always) leave children feeling lonely, with their emotional needs unfulfilled by their parents.
- Pressure to succeed

  Parents can suddenly "helicopter" in and proceed to put a high level of pressure on their children to succeed academically; this can sometimes lead to psychological and emotional problems for children. Evidence has shown a higher rate of anxiety and other mental health issues in children of affluent parents.
- Alcohol and substance abuse

  There may often be a more relaxed attitude to parties, sex and socialising, sometimes driven by parents' own behaviours. Additionally, as a result of a lack of effective supervision and the financial resources being available, children have both the opportunity and means to buy drugs and alcohol. This is sometimes driven by guilt as a result of emotional disconnect by the parents.
- Domestic abuse

In these cases, parents may already be separated or still together and causing emotional harm to the children. Whilst violence may not be obvious, coercive control (which is a criminal offence) is a common feature in relationships where safeguarding issues have come to light.

Signs that may indicate Neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g.: not having a winter coat;
- Children who are living in dangerous conditions, i.e.: around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care;
- Parents who fail to seek medical treatment when their children are ill or are injured;
- Children who have poor personal hygiene;
- Children who are frequently tired;
- Children who are frequently late / non-attendance at school;
- Children who have a poor relationship with peers;
- Children who are compulsively stealing and scavenging;
- Children who run away;
- Children with a loss of weight / being constantly underweight;
- Children who have low self-esteem; and
- Children with poor dental hygiene.

Wider Safeguarding Issues

Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting (also known as youth-produced sexual imagery [YPSI]) put children in danger.

Imbalance of Power

An individual or group taking advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity is of itself abusive. Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are both examples of this.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be:

- in exchange for something the victim needs or wants;
- for the financial or other advantage of the perpetrator or facilitator;
- and/or through violence or the threat of violence.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and / or enticement-based methods of compliance and may, or may

not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and / or take place online.

Child Abduction and Community Safety Incidents

Child abduction (the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child) can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

Issues such as people loitering near to School, taking photographs of Vincent Square or unknown adults engaging children in conversation also constitute community safety incidents which can raise concerns amongst children and parents.

The School gives practical advice on how pupils can keep themselves safe, including presentations by the Police and also notices such as "Travelling Safely To and From School". The School seeks to focus on building our pupils' confidence and abilities rather than simply warning them about all strangers.

Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. If staff become aware that a pupil is obliged to give evidence, advice should be sought from the DSL so that appropriate advice can be given, to explain each step of the process, the support and special measures that are available.

Child-on-child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and gender. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of "it could happen here".

These matters are often complex and will require support from the Police and Children's Services, as necessary.

It is statistically more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

All victims should be immediately reassured that they have acted appropriately in reporting the matter (regardless of how long it has taken for them to come forward) and they must not be given the impression that they are creating a problem by making such a report, nor should they be made to feel ashamed for making a report or their experience minimised. Abuse that occurs online or outside of School should not be downplayed and should be treated equally seriously. Nor should a victim ever be made to feel ashamed

for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and / or violent behaviour in the future. The School has a zero-tolerance approach to sexual violence and sexual harassment and teaching around these issues takes place within the RSE curriculum, with further detail in the School's RSE Policy.

Reports should be managed in accordance with good practice. Staff should always discuss concerns about sexually harmful behaviour involving pupils with the DSL. It is important that sexual violence and sexual harassment are shown to be unacceptable, and not passed off as "banter" or "part of growing up".

Where an incident between two pupils takes place away from the School, the School's safeguarding duties remain the same. The School will take reasonable measure to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media.

The initial response to a report from a child is incredibly important. How the School responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

Where there is a report of sexual violence, the DSL should make an immediate risk and needs assessment, then keep those assessments under review. This must consider:

- The victim, especially their protection, safety and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the School, especially any actions that are appropriate to protect them.

Engagement with specialist services (including the Police and Children's Services) will then be required.

Careful consideration will be given to:

- The fact that victims may not talk about the whole picture immediately and that they may be more comfortable providing information on a piecemeal basis so it is essential that dialogue is kept open and encouraged;
- The wishes of the victim in terms of how they want to proceed such that they feel in control of the process;
- Any investigation will be progressed and any support that they might need will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or staff;

- The proportionality of the response;
- A wide range of on-going health needs as a result of any sexual assault; and
- Other related issues and wider context.

While the facts are being established, the School will remove the alleged perpetrator from any classes shared with the victim, and consider how best to keep them at a reasonable distance apart, in the best interests of both children. Careful consideration will be given as to when to inform the alleged perpetrator, and this may be discussed with relevant agencies.

Consideration, with the support of professionals, will be given as to how the matter will be handled. There are four likely routes to be considered when managing a report of sexual violence or sexual harassment:

- Manage internally: in some cases of sexual harassment (such as one-off incidents) a school may be allowed to manage the incident internally;
- Early Help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- Referrals to Children's Social Services: in cases where there has been harm, or there is an immediate risk, a referral should be made to Children's Social Services;
- Reporting to the police: in cases where rape, assault by penetration or sexual assault is reported the School will not wait for the outcome of a Police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that the School's actions do not jeopardise the Police investigation. If a child is convicted or cautioned, the School will update the risk assessment and consider suitable action through their behaviour policy.

It is important to ensure the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken, or a child is found not guilty, the School will continue to support the victim and perpetrator.

The School recognises that in cases where the Police choose to take no further action, the School will continue to engage with specialist support for the victim: there is a need to be aware of the possible health needs that might arise following sexual assault, such as physical, mental and sexual health problems. It is also acknowledged that, when a child abuses another child, they may themselves have been a victim of abuse and the need to support the alleged perpetrator will be emphasised.

If there are delays in the handling of these issues, the priority will remain the protection of the victim and their ongoing welfare; coupled with that will be a commitment to the safeguarding and support of the alleged perpetrator.

Some situations are statutorily very clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves. The School recognises that consent means "freedom and capacity to choose" and this definition is addressed in the School's curriculum when appropriate.

Children being absent from education and Children Missing from Education (CME)

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. The School is alert to such matters and helps prevent the risk of them becoming a Child Missing from Education (CME) in the future by engaging with both pupils and families about any concerns. As such, appropriate safeguarding arrangements will be put in place to respond to children who are absent from education, particularly on repeat occasions and / or for prolonged periods.

The School understands its duty, as explained in KCSIE and Working Together to Improve School Attendance (HM Government, August 2024), in relation to the risks posed by children missing from education. All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect, or other issues.

The DSL will report to the Local Authority instances of prolonged unauthorised absence, usually over ten days, or a pupil being removed from the School's list under the circumstances outlined in KCSIE. All staff must also be aware of their role to prevent children from going missing from education.

In the short-term, the School will take appropriate action to find any pupil who is discovered to be missing from the School; the Deputy Master should normally be informed in the first instance and will co-ordinate the action taken. A written record is made of any incident of a pupil missing from the School, the action taken, and any reasons given by the pupil for being missing.

For longer-term absence, the School will ensure that any pupil currently on the Child Protection Register who is absent without explanation for two days is referred to Children's Services.

For further details of the School's procedures and responses please see the Pupil Registration and Attendance Policy. This contains the School's procedures for unauthorised absence, including on repeat occasions, as well as referral to the local authority.

Children with family members in prison

Children who have a parent sent to prison each year are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Advice should be sought from the DSL as to what support can be provided for members of staff and children.

Discrimination, bias, intersectionality and adultification

Many children and young people who come from Black, Asian and minoritised ethnic communities experience:

- Racism;
- Bias;
- Stereotyping;
- Cultural misunderstanding.

It might happen at an individual, institutional or societal level and might be displayed consciously or unconsciously, taking the form of stereotyping, confirmation bias and judging people on first impressions. This might result in people making harmful generalisations about specific communities, or generalising all ethnic minorities as having similar traits, practices and beliefs.

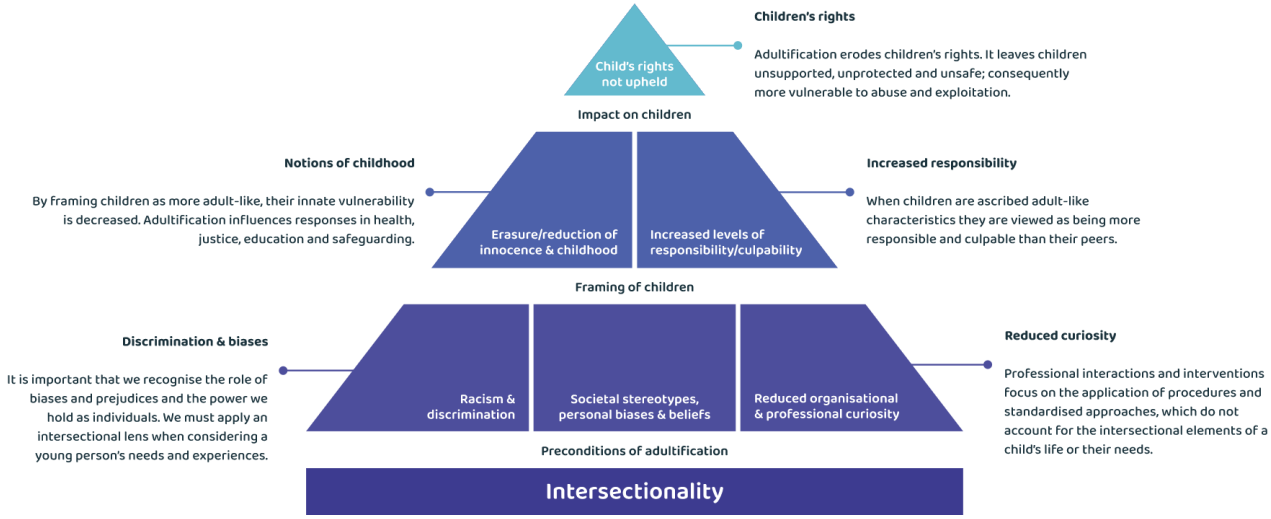
Ultimately, this can result in some children being more likely to come to the attention of child protection services, while other children are less likely to receive effective support.

As well as experiencing prejudice or bias related to their ethnic background, they might experience challenges relating to other parts of their identity, such as:

- Gender;
- Sexuality;
- Disability;
- Mental health;
- Having been in care;
- Where they live;
- How much money they have;
- How much access they have to education.;

The way these challenges interact is known as intersectionality.

The PIA (Professional Inter-Adultification) model (Davis and Marsh, 2020) helps to explain how children's rights are sometimes not upheld.



As such, extra safeguards may be needed to keep children from Black, Asian and minoritised ethnic communities safe from abuse. Advice should be sought from the DSL as to what support can be provided for members of staff and children.

Domestic Violence

Domestic abuse and violence is a safeguarding issue and children and young people are at risk and also vulnerable in terms of keeping themselves safe from others. It is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Young people can be affected in the following ways:

- Psychologically
- Physically
- Sexually
- Financially
- Emotionally

All children can witness (see and hear) and experience its effects and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as "teenage relationship abuse". Depending on the age of the young people, this may not be recognised in law under the statutory definition of "domestic abuse" (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with Children's Services in the local authority where the child lives.

Gangs and Child Criminal Exploitation (CCE) / County Lines

Criminal exploitation of children is a geographically widespread form of harm: drug networks or gangs groom and exploit children to coerce them into doing dangerous activities such as:

- forcing young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns (County Lines);
- forced labour, such as in cannabis factories;
- forced to shoplift, pickpocket or commit vehicle crime;
  threaten or commit serious violence to others

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the *National Referral Mechanism* (January 2020) will be considered.

This can affect any child or young person (male or female) under the age of 18 years. It

- Can still be exploitation even if the activity appears consensual;
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults;
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same; however, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Children can easily become trapped by this type of exploitation as gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the County Lines network.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Should staff discover that a child is homeless or is at risk of being made homeless, this should be reported to the DSL who will then raise or progress concerns with the local housing authority, as appropriate, as well as referring the matter to Children's Services in the borough where the child lives.

Indicators that a family may be at risk of homelessness include:

- Household debt;
- Rent arrears;
- Domestic abuse and anti-social behaviour;
- The family being asked to leave a property.

Children can easily become trapped by this type of exploitation as gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the County Lines network.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the Local Authority.

So-called Honour-based Abuse (HBA) including Female Genital Mutilation (FGM) and Forced Marriage

So-called Honour-based Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or community. Female Genital Mutilation (FGM) and forced

marriage are examples of such. All forms of so-called HBA are abuse, regardless of motivation, and should be handled and escalated as such. It should be noted that such abuse can often involve a wider network of family and community that can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Westminster Under School proposes to accept female pupils from September 2026. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of *Multi-agency statutory guidance on female genital mutilation* (July 2020); Chapter 9 focuses on the role of schools to which the School has due regard. Additionally, it is to be noted that virginity testing and hymenoplasty are illegal.

Whilst all staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police. Those failing to report such cases to the Police will face disciplinary sanctions. Unless the teacher has good reason not to, they should still consider and discuss the case with the DSL to involve the Local Authority as appropriate. This duty does not apply where a teacher merely *suspects* that an act of FGM may have been carried out or that a girl may be at risk of FGM. In all at risk or suspected cases and in cases relating to girls aged 18 or over, teachers should discuss their concerns with the DSL immediately. Any admin and support staff with concerns about FGM should also report their concerns to the DSL immediately.

It is a crime to carry out any conduct whose purpose is to cause a child to marry before they are 18, even if violence, threats or other forms of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial "marriages" as well as legal marriages. Members of staff with information about this matter must bring it to the attention of the DSL, who will inform the Police and/or the Local Authority.

Mental Health

Mental health issues can sometimes be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. That said, staff are extremely well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Those who support pupils' mental health, whilst bearing in mind patient confidentiality, will seek to ensure that key staff (such as Form Teachers, Heads of Year or the Assistant Master, Pastoral) are

aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

Mental health concerns should initially be followed up through the School's pastoral system: through Form Tutors, Heads of Year, and which will likely involve the School Counsellor. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by informing the DSL without delay.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

If staff have a concern about a child being caught up in modern slavery, the DSL should be notified and a referral should be made through the National Referral Mechanism.

Online Safety (eSafety)

Safeguarding of children extends to the online environment. All staff should be aware of the risks posed to children by technology and the Internet and should understand their role in preventing, identifying and responding to harm caused by its use. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories;
- **Contact**: being subjected to harmful online interaction with other users; for example child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g.: consensual and non-consensual sharing of nudes and semi-nudes and / or pornography), and online bullying;
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

There is a separate eSafety Policy. The School has adopted a whole-school approach to online safety which captures the range and complexity of the risks and of children's experiences of those risks; it seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the Internet; and handles all cases of online harm appropriately and with sensitivity. This policy should be read alongside the School's Policy on e-Safety and which sets out the School's approach to online safety in further detail. In particular, this policy sets out the risks posed to children by the Internet and technology, the indicators that a child may be at risk of such harm, and the measures taken by the

School to mitigate these risks, including pupil and parent education, staff training, and limiting the risk of harm caused by the School's IT systems (e.g., appropriate filters). There should be an awareness that unless a parent has added a filter, access to inappropriate content is still possible over a cellular data network, possibly without filters as well as potentially harmful content that has already been downloaded onto a device.

Members of staff must report matters to the DSL and the IT Helpdesk if they:

- Witness or suspect unsuitable material has been accessed.
- Can access unsuitable material.
- Are teaching topics which could create unusual activity on the filtering logs.
- Notice a failure in the software or a potential for the abuse of the system.
- Perceive unreasonable restrictions that affect teaching and learning or administrative tasks.
- Notice abbreviations or misspellings that allow access to restricted material.

Members of staff must confiscate any pupil-owned device with inappropriate material and pass that on to the DSL: members of staff should not look at the content of the device or seek to carry out their own investigation.

The School seeks to reinforce to parents and guardians the importance of children being safe online. Through presentations, online portals and supporting documentation it is made clear how the School filters and monitors online use, as well as what their children will be asked to do online, sites that pupils may be asked to access and with whom pupils may be interacting online.

From the beginning of the Election term 2026, following His Majesty's Government (HMG) guidance, pupils no longer keep mobile phones of any description, or smart watches, on them during the school day. These are deposited in a locker on arrival and collected at the end of the day on departing the school. Separate measures are put in place for, e.g., away fixtures.

Responsibilities

The DSL is the member of the SMT responsible for ensuring that the necessary filtering and monitoring standards are met.

The Governor with Responsibility for Safeguarding (DSG) is the member of the Governing Body responsible for ensuring that the necessary filtering and monitoring standards are met.

These responsibilities include:

- Procuring filtering and monitoring systems.
- Documenting decisions on what is blocked or allowed and why.
- Ensuring that blocking does not unreasonably impact teaching and learning.
- Reviewing the effectiveness of provision at least annually.
- Ensuring that there are effective safeguarding systems in place that meet the safeguarding needs of pupils.
- Overseeing reports.

They are also responsible for making sure that all staff:

- Understand their role.
- Are appropriately trained.
- Follow policies, processes and procedures.
- Act on reports and concerns.

The *Director of Digital Strategy and Operations* is responsible for:

- Procuring systems.
- Identifying risk.
- Carrying out reviews.
- Carrying out checks.

They will produce a written review on at least an annual basis or when

- A safeguarding risk is identified.
- There is a change in working practice.
- New technology is introduced.

Child-on-Child Abuse

Young people under the age of 18 are capable of physically, sexually or emotionally abusing other people under the age of 18 and it can happen both inside and outside of school and online. Even if there are no reports in School, it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important that any member of staff who has a concern regarding child-on-child abuse then they should speak to the DSL.

It is vitally important to challenge inappropriate behaviours between pupils, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours (e.g., dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys") can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Staff should not develop high thresholds before taking action: it must be taken as seriously as abuse by adults and be subject to the same safeguarding procedures. Members of staff must not attempt to deal with child-on-child abuse as a pastoral, classroom or disciplinary issue, and should not impose their own thresholds before consulting the DSL.

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between pupils;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or Youth Produced Sexual Imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

If there is reasonable cause to suspect that a child is suffering or likely to suffer harm at the hands of another child, the DSL will refer the matter to the police and/or local authority, whose directions the School will then follow. Allegations against pupils who have left the School but remain under 18 will be passed to the police and/or the Local Authority in the area in which the pupil is currently living. Generally speaking the School will always quickly inform the parents of victim(s) and perpetrator(s) of potential child-on-child abuse, unless (a) it has reason to believe that a child is at risk of significant harm, and doing so would make the situation worse or (b) it has been told not to by the police and/or Children's Services in the local authority where the child lives.

A victim of child-on-child abuse is likely to need considerable support. In addition, the perpetrator is likely to have unmet needs (the evidence suggests such children have often suffered disruption in their own lives) as well as posing a significant risk of harm to other children. As such, a pupil against whom an allegation of abuse has been made may be suspended from the School during an investigation.

After the immediate issues have been addressed, and depending on the severity of those issues, the police and/or Local Authority may decide to oversee risk assessments and care plans for the victim and/ or the perpetrator, in which case the School will cooperate fully; the police and/or local authority may decide to hand the matter back to the School, in which case the needs of the victim and / or perpetrator will be addressed as appropriate.

If a disclosure has been made of a crime and the victim decides not to support a Police investigation/prosecution, or if the Police determine that there is insufficient evidence to proceed with an investigation/prosecution, and correspondingly the matter is then handed back to the School, there are certain cases where it may not be possible for the School to investigate the same allegation internally. Such a situation may arise, for example, where the School lacks the necessary investigative powers to investigate serious criminal offences or where, in consultation with statutory agencies, it is felt that such an internal investigation would risk compromising a potential future Police investigation in the event of the victim changing their mind or of new evidence emerging.

The School actively seeks to prevent all forms of child-on-child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the School community, and responding to all cases of child-on-child abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Pupils are appropriately educated about

the nature and prevalence of child-on-child abuse via PSHEE lessons, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of bullying and Child-on-child abuse.

Staff are trained on the nature, prevalence and effect of child-on-child abuse, how to prevent, identify and respond to it.

Signs that may indicate Child-on-Child abuse:

- Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect;
- Physical injuries;
- Having difficulties with mental health and/or emotional wellbeing;
- Becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much;
- Drug and/or alcohol use;
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age.
- Children who have:
    - witnessed or experienced abuse or violence themselves;
    - suffered from the loss of a close family member or friend; or
    - experienced considerable disruption in their lives.

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the Safeguarding policy. If a child is in immediate danger or at risk of harm, a referral to children's social care and/or the police should be made immediately.

For further information on child-on-child abuse, see Appendix D.

Radicalisation and Preventing Extremism

CONTEST is the name of the UK's Counter-Terrorism Strategy and this is split into four areas:

- Prevent: to stop people becoming terrorists or supporting terrorism;
- Pursue: to stop terrorist attacks and prosecute wherever possible;
- Protect: to strengthen our protection against a terrorist attack;
- Prepare: to mitigate the impact of a terrorist attack when it cannot be stopped.

It is the School's duty (the Prevent duty) to have due regard to the need to prevent pupils from being radicalised and/or drawn into terrorism. It recognises that during the radicalisation process it is possible to intervene to prevent vulnerable people being radicalised. The main types of radicalisation in the UK are Islamist Radicalisation and the far-right radicalisation and extremism such as the English Defence League, neo-Nazi groups and. Far-right groups have surged in popularity in recent years. New ideologies can gain popularity quickly, such as the misogynist Incel movement,

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends, online, or where specific needs for which an extremist or terrorist group may appear to provide an answer to their psychological or emotional problems. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people.

The School is aware of the need to be alert to the risk of radicalisation: as with 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. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme, which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by identifying individuals at risk; assessing the nature and extent of that risk; and developing the most appropriate support plan for the individuals concerned which is to be undertaken with their consent.

The referral procedures set out below also apply where there are concerns about children who may be at risk of being drawn into terrorism. The DSL is the designated Prevent duty person responsible for co-ordinating action within the School and liaising with other agencies, including the Prevent Lead. The School has assessed the risk of radicalisation posed to the School's pupils and at present it considers the current risk to be low. The risk is reviewed annually as part of this policy's review procedure.

- The School will work in partnership with parents and with other agencies, including Police, LSCP and the Westminster City Prevent and Channel teams.
- The DSL will attend Prevent awareness training and provide advice to other members of staff.
- The School will help young people stay safe online through appropriate filters (see the Policy on e-Safety).
- Any visiting speakers to the School will be vetted by the Deputy DSL, and a record kept by them, in order to prevent extremist views being expressed without challenge.
- The School works more generally to ensure that Fundamental British Values of democracy, rule of law and acceptance of others are celebrated, modelled and are not undermined.

Signs that may indicate Radicalisation:

- a conviction that their religion, culture or beliefs are under threat and treated unjustly;
- a tendency to look for conspiracy theories, and a distrust of mainstream media;
- a sense of debt or guilt;
- blaming parents for family problems;
- feeling let down, and perhaps 'religious seeking';
- peer pressure, low self-esteem, and/or the need for identity and belonging;
- physical change/growth spurt (being bigger than peers);
- being secretive about who they have been talking to online and what sites they visit;
- switching screens when you come near the phone, tablet or computer;
- possessing items – electronic devices or phones – you have not given them;
- becoming emotionally volatile.

Self-harm

This includes deliberately cutting one's own skin, eating disorders and substance abuse.

Members of Staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority where the child lives, where appropriate.

Serious Bullying

Bullying can take many forms. Broadly, it is unkind and usually persistent behaviour intended to assert the power of one person over another, usually by frightening or humiliating them. It may take the form of verbal, physical or emotional abuse or harassment. A victim may be picked on because of gender, race, religion, culture, physical appearance, sexual orientation, a special educational need or disability – or for no obvious reason at all. The Anti-Bullying, -Abuse and -Discrimination Policy contains further details on the School's approach.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the police and/or the local authority where the child lives.

Serious violence

This involves pupils being at risk from or involved with serious violent crime, such that they are at risk from harm and exploitation.

The range of risk factors which increase the likelihood of involvement in serious violence, include:

- Being male;
- Having been frequently absent or permanently excluded from School;
- Having experienced child maltreatment; and
- Having been involved in offending, such as theft or robbery.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Sexting (or Youth Produced Sexual Images [YPSI])

Sexting is defined here as 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Creating and sharing sexual photos and videos of under-18s is illegal. When an incident involving sexting comes to the School'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 pupils 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 pupil at risk of harm. The UKCCIS guidance will be followed.

Consensual image sharing, especially between older children of the same age, may require a different response: it might not be abusive – but children still need to know it is illegal - whilst non-consensual is illegal and abusive.

In particular, members of staff who suspect that a sexualised image of a child is contained on an electronic device should not ask to view the image and under no circumstances should forward it, e.g., to a School email address – this is against the law.

At any point in the process, if there is a concern that a young person is in need or at risk of harm, a referral should be made to the Police and/or Children's Services immediately, in accordance with the procedures set out in this policy.

Sexuality

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+.

The Cass Review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and / or attention deficit hyperactivity disorder.

A cautious approach is taken with gender questioning children and consideration will be made of the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Ensuring that LGBT pupils feel supported is important as well as there being visibility around the School of LGBT issues, such as during Gay Pride Month, assemblies, etc. Members of staff with concerns about this matter must bring it to the attention of the DSL, who may consult with the Police and/or the local authority as appropriate.

Other actions to cause concern

Children may find themselves in situations that are not listed above but still might be at significant risk. These might include, for example, situations where another child in the household has been harmed or the household contains a known abuser.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Children in Need (Level Three)

At this level, which is defined by Section 17 of the Children Act 1989, a child is not immediately at risk, but his or her needs are already regularly unmet, and without the intervention of specialist support services working in partnership with the family, the child's situation will probably deteriorate still further.

Signs that may indicate a child in need:

Child

- Is disabled.
- Has special educational needs (whether or not they have a statutory education, health and care (EHC) plan).
- Is a young carer.
- Is bereaved.
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and / or serious violence, including knife crime.
- Is frequently missing / goes missing from care or from home.
- Is at risk of modern slavery, trafficking, sexual and / or criminal exploitation.
- Is at risk of being radicalised.
- Is viewing problematic and / or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Is suffering from mental ill health.
- Has returned home to their family from care.
- Is a privately fostered child.
- Has a parent or carer in custody.
- Is missing education or persistently absent from school, or not in receipt of fulltime education.
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

Parents or carers

- A family experiencing a crisis which may result in breakdown of care
- Parents separated, with conflict over contact (the child may be used as a pawn)
- Parents are inconsistent in their attachment to child: the child is rarely comforted or encouraged
- Supervision of child is sometimes unsafe
- Parents sometimes use inappropriate caregivers
- Parents struggle to provide for child's basic physical or emotional needs as a result of mental health or disability issues, substance misuse (including alcohol) or domestic abuse
- Parents frequently put their own needs above those of child

Members of staff with information about such matters must bring it to the attention of the DSL, who will consult with the local authority where the child lives.

Early Help Plans (Level Two)

At this level, a child is not immediately in need, but may be vulnerable to emerging issues that may turn into more serious and longer-term issues if left unaddressed.

Signs that may indicate an Early Help Plan is needed:

Children

- A disability or physical illness which requires some support
- Newly arrived in the UK
- Slight speech or language issues
- Missing routine health appointments
- Missing some immunisations
- Slow physical development
- Minor dietary issues
- Minor mental health issues emerging
- Exploring alcohol abuse or low-level drugs relationships are sometimes risky
- Gang involvement and association with organised crime groups
- Clothing and/or personal hygiene raise low-level concerns
- School attendance is noticeably low (normally consistently below 90% without good reason)
- Special Educational Needs
- Struggling academically
- Escalating behaviour issues
- Questioning self-worth
- Has some caring responsibilities in family
- At risk of modern slavery, trafficking or exploitation;
- At risk of being radicalised;
- Has returned home to their family from care
- Is privately fostered

Parents or carers

- Family relationships are strained
- Family are experiencing issues such as bereavement or divorce
- Parents are experiencing parenting challenges
- Parental supervision raises low-level concerns
- Parents are over-protective
- Parents do not provide a safe context (drug and alcohol misuse, mental health issues, domestic abuse).

The school is likely to seek advice from children's services where the child lives in such a circumstance. The School will be part of discussions with statutory safeguarding partners to agree the levels for the

different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Usually, the local authority will refer the matter back to the School to put together an Early Help Plan which will seek to inform the pupil's family more formally in providing support.

EHPs are only drawn up with the parent's full agreement and cannot exist without it. External professionals sometimes assist with this. A copy of any completed EHP is usually sent by the DSL to the local authority covering the pupil's home address, although this can vary between areas.

Individual Welfare Plans (Level One)

Many of our pupils will have temporary issues to do with:

- Health concerns
- Family issues
- Academic worries
- Peer relationships

These matters will be addressed successfully by their families and by services that are universally open to all pupils on a daily basis:

- Medical facilities
- NHS services
- Counselling*
- Pastoral staff
- Learning Development team

Children whose needs are met by these universal services are said to be at Level One.

There will be a few pupils every year whose difficulties will be such that the School will need to ensure it coordinates services more formally and this is done using an Individual Welfare Plan (IWP). These are not recorded as safeguarding issues unless other factors are involved. With the permission of the pupils (where appropriate), information is shared as early as possible with parents and other agencies.

*The School Counsellor has a trained therapy dog which she brings into school as part of counselling sessions with dogs. This is an opt-out addition done via an online form and only pupils who wish to have contact with the dog will do so.

Adverse Childhood Experiences (ACEs)

Any form of abuse can result in an Adverse Childhood Experience (ACE) and these will have long-term impacts on both health and life chances. Abuse experienced directly by the child or present in the household can lead to these behaviours becoming normalised, leaving children who live in these environments at risk of being either a perpetrator or victim of harm in adulthood. It should be noted that experiencing ACEs is not determined by wealth or social standing.

The trauma induced by such abuse can lead to children engaging in harmful behaviours which can manifest in School or online. These behaviours can offer short-term relief but at the expense of longer-term health. For example, smoking, harmful alcohol consumption, poor diet, and early sexual activity. During school years, children who are experiencing ACEs will be displaying a heightened emotional state of anxiety, they will always be ready to fight or flee and will find it difficult to focus on education.

Building resilience to ACEs

There are four blocks recognised to build resilience for all pupils:

1. Having one or more stable, caring child-adult relationship.
2. Feeling that it is possible to overcome hardship and guide one's own destiny.
3. Being grounded in cultural traditions and feeling connected.
4. Being equipped to manage behaviour and emotions.

Creating a supportive environment

The School itself can be a protective factor in response to the trauma of ACEs and the School will seek to promote the following:

- *Safety*
  Creating an environment where all children feel safe: physically, emotionally, socially and academically. All school staff understand how trauma can affect learning.
- *Choice*
  Maximising pupil choice and control as well as addressing trauma in holistic ways, not in a singular programme.
- *Collaboration*
  Maximising collaboration and sharing power, explicitly making children feel part of the school community and provide children with multiple opportunities to practise newly developing social and behavioural skills.
- *Empowerment*
  Committing to a shared sense of responsibility for helping every child succeed, maximising opportunities which build on and validate others' strengths and creating opportunities for individuals to take power for themselves and realise their individual strengths.
- *Trust*
  Being available for pupils and maximising trust through relationships, task clarity, consistency and interpersonal boundaries.

Procedure for dealing with concerns or allegations against members of staff

This section refers to members all members of staff, including supply teachers, volunteers and contractors.

The safety and wellbeing of our pupils depend on the vigilance of all our staff and their prompt communication to the Master of any concerns, no matter how small, about any adult's suitability to work with or have access to children.

The notification and prompt handling of all concerns about adults (including staff, supply staff and volunteers) is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

When handling allegations, the School will always follow Part 4 of KCSIE. Responsibility for appropriate action rests with the Master. The procedure would be used in all cases in which it is alleged that a teacher or other member of staff or volunteer has:

a) behaved in a way that has harmed a child, or may have harmed a child;
b) possibly committed a criminal offence against or related to a child; or
c) behaved towards a child or children in a way that indicates s/he would pose a risk of harm to children.
d) Behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferrable risk). This may include Children's Social Care involvement with their own child, being the perpetrator of domestic abuse, mental ill health or substance misuse issues **that may impact the care of children**, criminal proceedings for Hate crime or membership of organisations with terrorist or extreme right-wing links believed to cause harm to others.

The School will formally inform the LADO within 24-hours who will then make contact with the School to provide advice and determine whether any actions are required to safeguard children. The LADO will determine the distinction between a complaint, a concern about the quality of practice and an allegation.

Appendix I indicates the thresholds used locally by the LADO to determine the level of concern and appropriate response.

Informing others about concerns

Any such concerns or allegations about an adult in the School (including supply staff, contractors and volunteers, as well as those working with the pupils outside the School) should be reported to the Master immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed.

If there is a conflict of interest in reporting the matter to the Master, this should be reported directly to the LADO.

The adult to whom the concern or allegation (referred to hereafter as allegation) relates should *not* be informed.

If **the allegation is about the DSL**, then the Master will need to be informed directly, without informing the DSL.

If the allegation is about the Master, staff must immediately inform the Chair of the Governing Body (or, in his absence, the Governor with responsibility for safeguarding), without informing the Master.

The Master (or the Chairman of the Governing Body in cases of allegations against the Master) will inform the local authority designated officer (the LADO) of all allegations which meet the criteria above as soon as possible and in any event within 24-hours of the School becoming aware of the allegation. If it is suspected that a crime has been committed, the Police will be informed, and then the LADO.

The Master will normally discuss all allegations with the DSL unless it relates to the DSL. Borderline cases may be discussed without identifying individuals in the first instance.

Handling concerns

All allegations will be dealt with using common sense and judgment, will act fairly, quickly and consistently in a manner that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation:

- **Looking after the welfare of the child**: the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the Police and / or the Local Authority.
- **Investigating and supporting the person subject to the allegation**: discussions will be had with the LADO concerning the nature, content and context of the allegation, and a course of action will be agreed.

The LADO will discuss with the Master (or Chair of the Governing Body, as above), and any other relevant agencies such as the police, which further steps, if any, should be taken; this could involve informing parents.

Where a referral to the police has been made directly the Master (or Chair of the Governing Body) will inform the LADO of the referral as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. There may be cases where the LADO or police are made aware of an allegation before the School is and in those cases they will notify the School of the allegation immediately. All discussions with external agencies should be recorded in writing.

When an allegation is made, the School will make every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. Where a teacher is facing an allegation of a criminal offence involving a pupil registered at the School, the teacher concerned is legally entitled to anonymity until the teacher is charged with an offence, the anonymity is waived by the teacher or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. In particular, the Education Act 2011 prevents the publication of any material which could lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation).

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

The person against whom an allegation is made should normally be informed as soon as possible after the result of the initial investigation is known. However, where a strategy discussion is needed or police or children's social care need to be involved neither the person against whom the allegation has been made nor the individual making the allegation should be informed until these agencies have been consulted.

When the individual against whom the allegations have been made is spoken to, he/she will be warned that anything said will be recorded. The School will appoint a representative to keep the person informed of the likely course of action and the progress of the case. They should also advise the individual to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer. They will be kept informed of the timescales in accordance with KCSIE.

Supply Teachers and Contractors

The School does not currently work with supply teachers.

Should the School appoint a supply teacher, even though the School would not be the employer, the School would ensure allegations are dealt with properly: supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in a school or college. This would mean that if the School were to decide against using a supply teacher due to safeguarding concerns, the School would seek out the facts and liaise with the LADO, with the School typically taking the lead in such matters. Consideration would be given to suspending the supply teacher, or redeploying them to another part of the School, whilst the investigation was carried out. The supply teacher would be advised to contact their trade union representative if they have one, or a colleague for support.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies. Agencies would be fully involved and it would be expected that they would cooperate in any enquiries. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

Any concerns about contractors who work on site, either in a supervised capacity or with regular contractors who are on the School's SCR will be dealt with by the Master.

Support for Staff

The School recognises that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or School Counsellor. Similarly, during any protracted procedure arising from claims of abuse, the School Counsellor may be able to offer confidential support to the member of staff. Members of staff also have access to the School's Employee Assistance Programme.

Suspension

If there is cause to suspect that a child or children at the School are at risk of harm from the accused person, or the case is so serious that it might be grounds for dismissal, then consideration will be given to suspending the accused person. Due weight should be given to the views of the LADO and to the police when making a decision about suspension and all alternative options should be considered prior to taking that step.

The reasons and justification for suspension will be recorded and the individual informed of them. In the case of staff, the matter will normally be dealt with in accordance with the Staff Code of Conduct.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School it will be necessary to immediately suspend that person from teaching pending the findings of the investigation by the Teaching Regulation Agency ("the TRA").

In the case of a concern about or an allegation being made against a member of staff resident in Adrian or George House – if a suspension from work is deemed appropriate while an investigation takes place – that member of staff will be temporarily rehoused in accommodation which is not within Adrian or George House.

The following alternatives will be considered before suspending a member of staff:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the member of staff (this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views: it should be made making it clear that this is not a punishment and parents have been consulted); or,
- Temporarily redeploying the member of staff to another role in a different location.

If suspension is decided as the most appropriate course of action, a record will be kept as to what alternatives to suspension were considered and why they were rejected.

Whilst suspended, social contact with work colleagues and friends is permitted (unless there is evidence to suggest this may prejudice the gathering of evidence), but confidentiality must be maintained.

Notification to parents

The School will always encourage a pupil to allow the School to share information with the pupil's parents, unless there is evidence to suggest this may prejudice the gathering of evidence.

The School aims to ensure that parents of the child or children involved should be:

- Formally told about the allegation as soon as possible. The School will consult with the LADO and where involved the police and/or the Local Authority about what information can be disclosed.
- Kept informed about the progress of the case, only in relation to their child – no information can be shared regarding the staff member.
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

Further enquiries and timeframes

Every effort will be made to progress an investigation to ensure that matters are dealt with as quickly as possible in a thorough and fair process. Where it is necessary, reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Outcomes

The initial sharing of information and investigation may lead to a decision that no further action is to be taken in which case this decision should be recorded by the Master and an agreement should be reached with the LADO on what information should be put in writing to the individual concerned.

The definitions that determine the outcome of an allegation are as follows:

1. **Substantiated**: there is sufficient evidence to prove the allegation;
2. **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
3. **False**: there is sufficient evidence to disprove the allegation;
4. **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
5. **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the outcome is (2) malicious, (3) false, (4) unsubstantiated or (5) unfounded, a confidential record will be kept, but the decision will not affect the member of staff's employment, and it will not be mentioned in any reference for employment elsewhere.

If the allegation is (1) substantiated, this will be recorded and will be mentioned in any reference for employment elsewhere.

The Master should then consider with the LADO about what action should follow, both in respect of the individual and those who made the initial allegation. Where appropriate, the matter will be dealt with under the School's Disciplinary Rules and Procedures for Staff Policy and will include responses such as no further action, to dismissal or a decision not to use the person's services in future.

If an allegation is made against a Governor, the School will follow the same procedures as outlined for staff. Where an allegation is substantiated, the School will follow the procedures to consider removing the Governor from office.

Record-keeping

A record will be made of all conversations, including any advice or recommendations. The following will be kept on file:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved; a note of any action taken, and decisions reached and the outcome as categorised above;
- A copy provided to the person concerned, where agreed by the Police and / or the Local Authority; and,
- A declaration on whether the information will be referred to in any future reference.

Allegations that are found to have been (1) malicious or (3) false will be removed from personnel records and the person against whom the complaint has been made will be informed that the matter is closed.

However, for all other allegations, the School will in accordance with KCSIE retain a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decision reached on the personnel record. A copy should be provided to the person concerned.

Following-up

During the course of the investigation, the School in consultation with the LADO will decide what information (if any) will be given to parents, staff, volunteers and other students and how media enquiries are to be dealt with. Any pupils who are involved will receive appropriate care.

If it is established that the allegation is (2) malicious, (3) false, (4) unsubstantiated or (5) unfounded, a written record will be made of the decision and the justification for it and then the person against whom the complaint has been made would normally be informed that the matter is closed. Consideration will be given as to whether the child and / or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help: in such circumstances, a referral to the Local Authority may be appropriate.

If the allegation is (1) substantiated and the member of staff (whether employed, contracted, a volunteer or a student) is dismissed; resigns, or otherwise ceases to provide their services; or is asked to leave the School, or would have been removed had they not left, on the grounds that they:

- harmed a child or vulnerable adult (engaged in relevant conduct)
- pose a risk of harm to vulnerable groups including children (satisfied the harm test)
- received a caution or conviction for a relevant offence

then the Master will (as soon as possible after the person has resigned or the School has ceased to use their services) notify the Disclosure and Barring Service at PO Box 101, Darlington DL1 9FA (01325 953795). DBS guidance is given in http://www.homeoffice.gov.uk/dbs.

The School will not enter into settlement or compromise agreements to prevent a referral being made to the DBS when it is legally required. Failure to make a report by an employer where the member of staff has harmed or is likely to harm a child constitutes a criminal offence.

For teachers, separate consideration will be given as to whether to refer the matter to the Secretary of State (through the Teaching Regulation Agency) in order to consider prohibiting the individual from teaching (this includes cases where they would have been dismissed if they had not resigned): the Master, consulting the LADO, will consider whether or not to refer the matter to the Teaching Regulation Agency. The Teaching Regulation Agency may impose a prohibition order to prevent teachers from working in the profession following a finding of:

- Unacceptable professional conduct;
- Conduct that may bring the profession into disrepute; or
- Conviction, at any time, for a relevant offence.

Following a criminal investigation

Where the Police inform the LADO and employer that:

- A criminal investigation and any subsequent trial is complete
- It is decided to close an investigation without charge
- It is decided not to continue to prosecute after the person has been charged

Consideration will be given as to whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

Returning to work

In discussion with the individual, appropriate help and support will be proffered to return to work after what is likely to have been a stressful experience. Depending on the individual's circumstances, a phased return and / or the provision of a mentor to provide assistance and support in the short term may be appropriate. Consideration will also be given as to how the individual's contact with the child or children who made the allegation can best be managed if they are still attending the School.

Resignations

Every effort will be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate

Wherever possible, the individual should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information

available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

In limited circumstances, the School sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Learning lessons

The School will always consider what lessons can be learnt from any cases of abuse and how the School's safeguarding systems can be improved to reduce the risk of such abuse recurring.

Non-recent allegations

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the Police; additionally, the information should be passed to the Master, who will check the existence of other relevant records before promptly informing the Police and the LADO.

Non-recent allegations made by a child should be reported to the Police and/or the Local Authority (see Appendix C).

Abuse can be reported no matter how long ago it happened.

Members of staff who become aware of allegations involving former colleagues or former pupils should share the information as outlined above, but must otherwise keep the matter wholly confidential.

Concerns that do not meet the harm threshold

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

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The School's Low-Level Concerns Policy outlines the School's response in such circumstances. The policy is designed to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

The Management of Safeguarding and Child Protection

Record-keeping

The DSL is responsible for keeping a secure, accurate written record of concerns raised and actions taken**. All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing (which may be online and/or in hard copy). Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The DSL is also responsible for ensuring that the safeguarding file is passed on promptly to the future educational establishment of any pupil leaving the School before the age of 18. Consideration will be given to sharing information in advance of sharing the child protection file.

The School will keep a copy of the file until receipt of the original is confirmed in writing by the new establishment, whereupon the copy will be destroyed. The safeguarding files of pupils who remain at school until age 18 would ordinarily be kept securely for a further six years before being destroyed, but due to the Independent Inquiry into Child Sex Abuse (IICSA) the School has currently suspended the destruction of records.

General principles on information sharing (see also Appendices A, B, C and D)

NECESSARY AND PROPORTIONATE
When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

RELEVANT
Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

ADEQUATE
Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

ACCURATE
Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

TIMELY
Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

SECURE
Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

RECORD
Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

The fundamental principle is that sharing of information should be done in the best interests of the child.

Procedure for staff dealing with abuse (including child-on-child abuse)

If a staff member has any concerns about a child, then they should discuss these with the DSL. The DSL will decide on an appropriate course of action. This discussion and actions taken will be recorded. The flow chart in Appendix C, Actions where there are concerns about a child*,* provides a guide to the process.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision for both victim and perpetrator.

Options include:

- Managing any support for the child internally via the School's own pastoral support processes;
- An early help assessment; or
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

The involvement of the Police will be considered and thresholds for contacting the Police are available (although where a child is in imminent danger, there should be no hesitation in contacting the Police immediately) *When to Call the Police: Guidance for Schools and Colleges* (February 2020). The DSL will, as appropriate, liaise with the Local Authority and work with other agencies in line with *Working Together to Safeguard Children* (March 2026).

Early Help

- All staff should be aware of the Early Help process, and understand their role. This includes:
- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment;
- in some cases, acting as the lead professional in undertaking an assessment of the need for Early Help.

All staff should be alert to identifying children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of early help then they should, in the first instance, discuss Early Help requirements with the DSL.

Where a child and family would benefit from coordinated support from more than one agency (e.g.: education, health, Police) there should be an inter-agency early help assessment – such as the Common Assessment Framework. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. If Early Help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment as appropriate.

The Early Help assessment should be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and / or Special Educational Needs Coordinator). Decisions as to who performs this role should be taken on a case by case basis and should be informed by the child and their family.

For an early help assessment to be effective:

- It should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them;
- A teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority;
- If parents and / or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to Children's Social Services may be necessary.

Effective early help in a school setting involves the School (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to Children's Social Services if the child's situation does not appear to be improving.

Children in need or who are at risk of significant harm or in immediate danger

If at any time it is considered that the child may be a child in need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to Children's Social Services – in the local authority where the child lives and in accordance with the threshold document published by the relevant LSCP or equivalent.

If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Services and / or the Police immediately.

Any member of staff (or volunteer) may make a referral directly to Children's Social Services. There is a duty on all staff to persist with referrals to Children's Social Services if they feel appropriate action is not being taken. However, all staff are expected to raise concerns with the DSL in the first instance and should inform them if they make a referral directly.

If confronted with a possible case of abuse, or disclosure of abuse, each member of staff should in the first instance follow the simple rules of listening and being supportive, but without asking any leading questions. Staff should write up their conversation as soon as possible (as near *verbatim* as possible) and such notes should be signed and dated by the member of staff and handed to the DSL.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If a pupil is deemed to be at risk, or has made an allegation or disclosure of abuse, it must be explained to the pupil that the member of staff is under a duty to report the matter and that confidentiality cannot be promised. All Staff will be made aware that they have a professional responsibility to share information in order to safeguard children. The pupil will need to be reassured that only the minimum number of people will need to know in order to keep them safe, and that it is in their best interests that the matter is reported. It is not appropriate for Staff to conduct any kind of investigation; Staff cannot undertake to keep confidential what the pupil has told them. If a member of staff has concerns about an adult's behaviour towards pupils, they *must* report these to the Master.

A child's wishes and feelings should be taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback to Staff. These operate with the best interests of the child at their heart.

It is not a requirement for parental consent to have been given for a referral to be made to a statutory agency.

In each case, discretion and confidence will be maintained at the appropriate level, the DSL being responsible for communicating strategies and decisions to fellow professionals. The DSL will report his response to the Master; keep them apprised of any developments; and maintain the written records.

Whistleblowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk they should follow the School's Whistleblowing by Staff and Volunteers Policy.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures. Where an adult feels unable to raise a concern about poor safeguarding practice with the School, or where they feel that their concern is not being addressed, they can raise their concern externally:

- Guidance can be found at - https://www.gov.uk/whistleblowing
- The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally.
  T: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday
  E: help@nspcc.org.uk
  A: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London, EC2A 3NH.

Monitoring, evaluation and review

The Governing Body has ultimate responsibility for safeguarding and for the leadership of high-quality safeguarding within the School so as to create a safe environment for pupils.

All governors receive appropriate safeguarding and child protection (including online) training at induction in order to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. In addition, governors have at the forefront of their minds their responsibilities under the Human Rights Act (1998), the Equality Act (2010) including the Public Sector Equality Duty, and also the Local Authority arrangements. Training for governors is updated on at least an annual basis.

A member of the Governing Body has leadership responsibility for the School's safeguarding arrangements and is responsible for overseeing safeguarding matters and procedures within the School: this Governor receives regular safeguarding training, such that they have the necessary knowledge, skills and expertise for the role. The DSL reports regularly to this Governor responsible for safeguarding procedures and on particular causes for concern.

The Governing Body is expected to ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote the welfare of children. The Governing Body has a number of specific duties involving oversight and review, which are set out in Part 2 of *KCSIE* and which include:

- The School's safeguarding policies (to be reviewed at least annually)
- The position and role of the DSL

- Inter-agency working
- Staff induction
- Staff training
- Online safety
- IT (bearing in mind the age range of the pupils, the number of pupils, how often pupils access the IT system and the proportionality of costs versus safeguarding risks)
    - Filters and monitoring
    - Leadership team and relevant staff's awareness and understanding of the provisions in place, their ability to manage them effectively and awareness of how to escalate concerns when identified.
    - Teaching pupils about safeguarding
    - Inspection
    - Looked After Children
    - Safer recruitment
    - Allegations of abuse made against staff and other children
    - Children with special educational needs (SEN) and disabilities.

The Governing Body discharges these duties by receiving annual reports on safeguarding matters from both the DSL and the Governor with responsibility for safeguarding, enabling it to review how effectively the School is fulfilling its obligations under current legislation; reviewing this policy annually and inspecting the School's Single Central Register.

This policy is reviewed at least annually by the Governing Body, and updated more frequently as necessary by the DSL, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The School regularly assesses the effectiveness of its safeguarding procedures as a whole – in a group including, amongst others, the DSL, Deputy DSLs and other staff with significant pastoral responsibilities – and will seek to remedy any deficiencies without delay.

Appendix A - Child Protection Procedures (Issued to Staff on a Wallet-Sized Card)

To apply from the second week of the Election term, 2026

WESTMINSTER UNDER SCHOOL SAFEGUARDING 'PINK CARD' MAY 2026

PROCESS:	HOW TO REACT:	
Receive Reassure Respond Record Report	Act professionally at all times. Treat all pupils with respect Listen actively, use TED: Tell, Explain, Describe Do not make a promise of confidentially to pupils	Do not exaggerate, trivialise or ignore child abuse (physical, sexual, emotional abuse), neglect or exploitation. Report all concerns, however trivial: do not fail to report something about which you are concerned.

If you think a child is in immediate danger, or you believe a crime has been committed, ring the Police on 999.

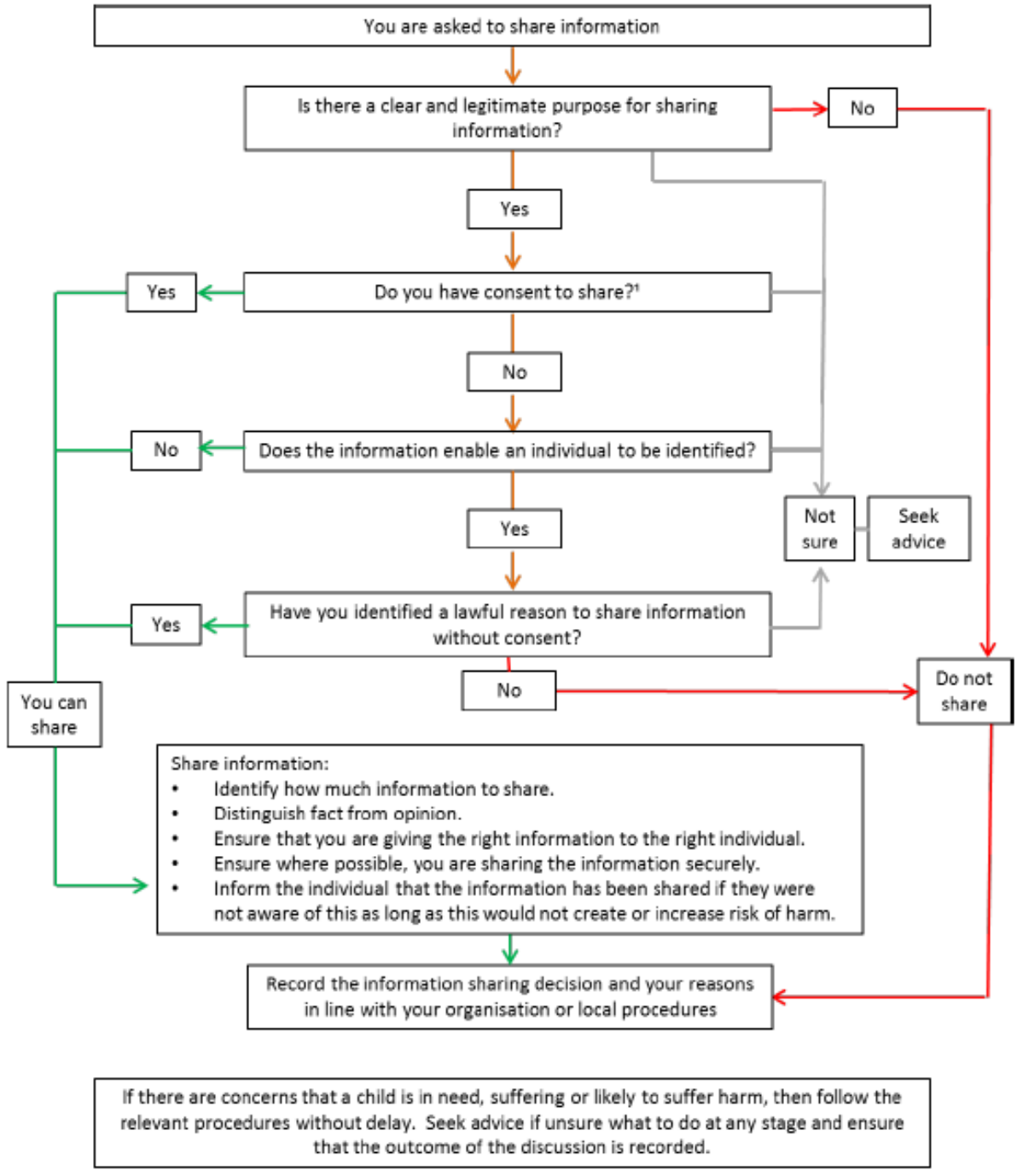
WHAT TO DO IF YOU KNOW OR SUSPECT A CHILD IS IN DANGER
- Report the matter immediately to the DSL or to a Deputy DSL whose contact details are below.
- Do not share your concerns with other adults or pupils.
- If you cannot reach a DSL or DDSL promptly, contact Children's Services in the authority where the child lives. If a child is in danger, call the police on 999 and do not let them go home.

SAFEGUARDING TEAM CONTACTS
- Hayley Wellman, Deputy Master Lower School and DSL (hayley.wellman@westminster.org.uk). Also Senior Attendance Champion and responsibility for Safeguarding in EYFS
- Tom Dumas, Assistant Director of Sport (thomas.dumas@westminster.org.uk)
- Peter Lawson, Head of TPR and Years 5 & 6 (peter.lawson@westminster.org.uk)
- Harriet Lindley, Acting Assistant Master, Pastoral (harriet.lindley@westminster.org.uk)
- Hayley Wellman, Assistant Master, Juniors (hayley.wellman@westminster.org.uk)

You can also record concerns under 'Safeguarding' in Pastoral Notes on the School MIS or by emailing WUSSafeguardingTeamML@westminster.org.uk

WHAT TO DO IF YOU HAVE A CONCERN ABOUT AN ADULT IN SCHOOL
This includes low-level concerns where a child may not necessariy have come to any harm.
- Report the matter immediately to the Master (kate.jefferson@westminster.org.uk)
- If the concern is about the Master, report it to the Chair of Governors, Mr Mark Batten chairofgovernors@westminster.org.uk)

Appendix B - Flowchart of When and How to Share Information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

Appendix C - Actions where there are Concerns about a Child

[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

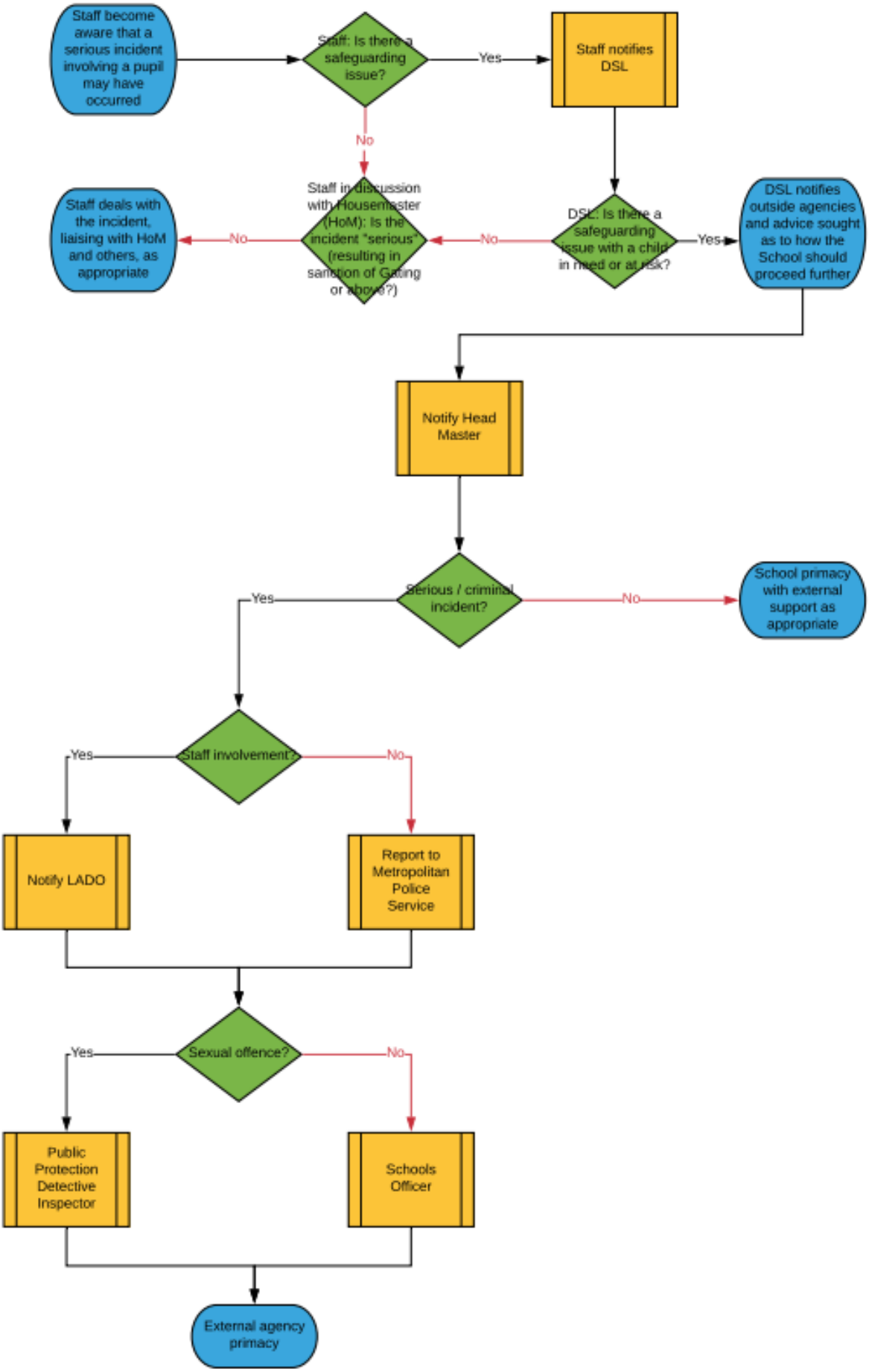
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Local Reporting Protocols in Westminster



Appendix D – Child-on-Child Abuse

What is Child-on-Child abuse?

For these purposes, Child-on-Child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to bullying (including cyber-bullying, prejudice-based and discriminatory bullying), relationship abuse[1], relationship abuse, physical abuse, domestic violence, sexual violence, sexual harassment, child sexual exploitation, youth and serious youth violence, harmful sexual behaviours, gender-based violence and initiation/hazing-type violence and rituals.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

What role does gender play?

Child-on-child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low-level bullying (where the School`s Anti-Bullying, -Abuse and -Discrimination Policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm: (b) where there is an element of coercion or pre-planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

How can I identify victims of Child-on-Child abuse?

By being alert to children's wellbeing and to signs of abuse. Signs that a child may be suffering from Child-on-Child abuse overlap with those relating to other types of abuse and include: (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional wellbeing; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's

[1] https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/

age. Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?
Any child can be affected by Child-on-Child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

a) Child-on-Child abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual behaviour;
b) children who are particularly vulnerable to abuse or to abusing others include those who have

(i) witnessed or experienced abuse or violence themselves;
(ii) suffered from the loss of a close family member or friend;
(iii) experienced considerable disruption in their lives.

How prevalent is Child-on-Child abuse?
Recent research suggests that Child-on-Child abuse is one of the most common forms of abuse affecting children in the UK. For example, over a third of young boys in England admitted to watching pornography and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al., 2011).

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?
If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the Safeguarding policy. If a child is in immediate danger or at risk of harm, a referral to children's social care and/or the police should be made immediately.

How will the DSL respond to concerns of Child-on-Child abuse?
Pupils may make allegations about Child-on-Child abuse, just as members of staff may become aware of issues.

If a pupil makes an allegation, then this will be treated in the same way as any disclosure (see Appendix A for further information).

If a member of staff makes an allegation, the DSL will discuss the behaviour with the member of staff directly.

Regardless of the source of an allegation, the priority is to take any immediate steps to ensure the safety of the victim(s) or any other child.

Where the DSL considers or suspects that the behaviour might constitute the Local Authority should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will

discuss the incident with the police and/or the Local Authority and agree on a course of action, which may include:
(a) taking any steps to ensure the safety and wellbeing of any children affected;
(b) further investigation;
(c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services;
(d) a strategy meeting.

Any response should be decided in conjunction with children's social care and other relevant agencies and should:

- Investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, he may also have considerable unmet needs and be at risk of harm himself.
- take into account the complexity of Child-on-Child abuse and of children´s experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator poses and will continue to pose to other children, their own unmet needs, and the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including:
  (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his behaviour;
  (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and
  (c) to ensure the safety and wellbeing of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the School;
- provide on-going support to victim(s) including by
  (a) ensuring their immediate safety;
  (b) responding promptly and appropriately to the abuse;
  (c) assessing and addressing any unmet needs;
  (d) following the procedures set out in the safeguarding policy (including where the child is in need of Early Help or statutory intervention);
  (e) monitoring the child´s wellbeing closely and ensuring that he receives on-going support from all relevant staff members (including the School Counsellor) within the School;
  (f) engaging with the child´s parents and any external agencies to ensure that the child´s needs are met in the long-term;
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: equalities work, work around school safety, security and supervision, awareness raising for staff, pupils and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the School raise awareness of and reduce the risk of Child-on-Child abuse?

The School actively seeks to prevent all forms of child-on-child abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the School community, and responding to all cases of child-on-child abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Children are educated about the nature and prevalence of child-on-child abuse via PSHE lessons, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of bullying and child-on-child abuse.

Staff are trained on the nature, prevalence and effect of child-on-child abuse, how to prevent, identify and respond to it.

Appendix E – The Four Levels of Need

Tier 1: No additional needs

These are children with no additional needs; all their health and developmental needs will be met by universal services. These are children who consistently receive child focused care giving from their parents or carers. The majority of children living in each local authority area require support from universal services alone.

Tier 2: Early Help

These are children with additional needs, who may be vulnerable and showing early signs of abuse and/or neglect; their needs are not clear, not known or not being met. These children may be subject to adult focused care giving.

This is the threshold for a multi-agency early help assessment to begin. These are children who require a lead professional for a co-ordinated approach to the provision of additional services such as family support services, parenting programmes and children's centres. These will be provided within universal or targeted services provision and do not include services from children's social care.

Tier 3: Children with complex multiple needs

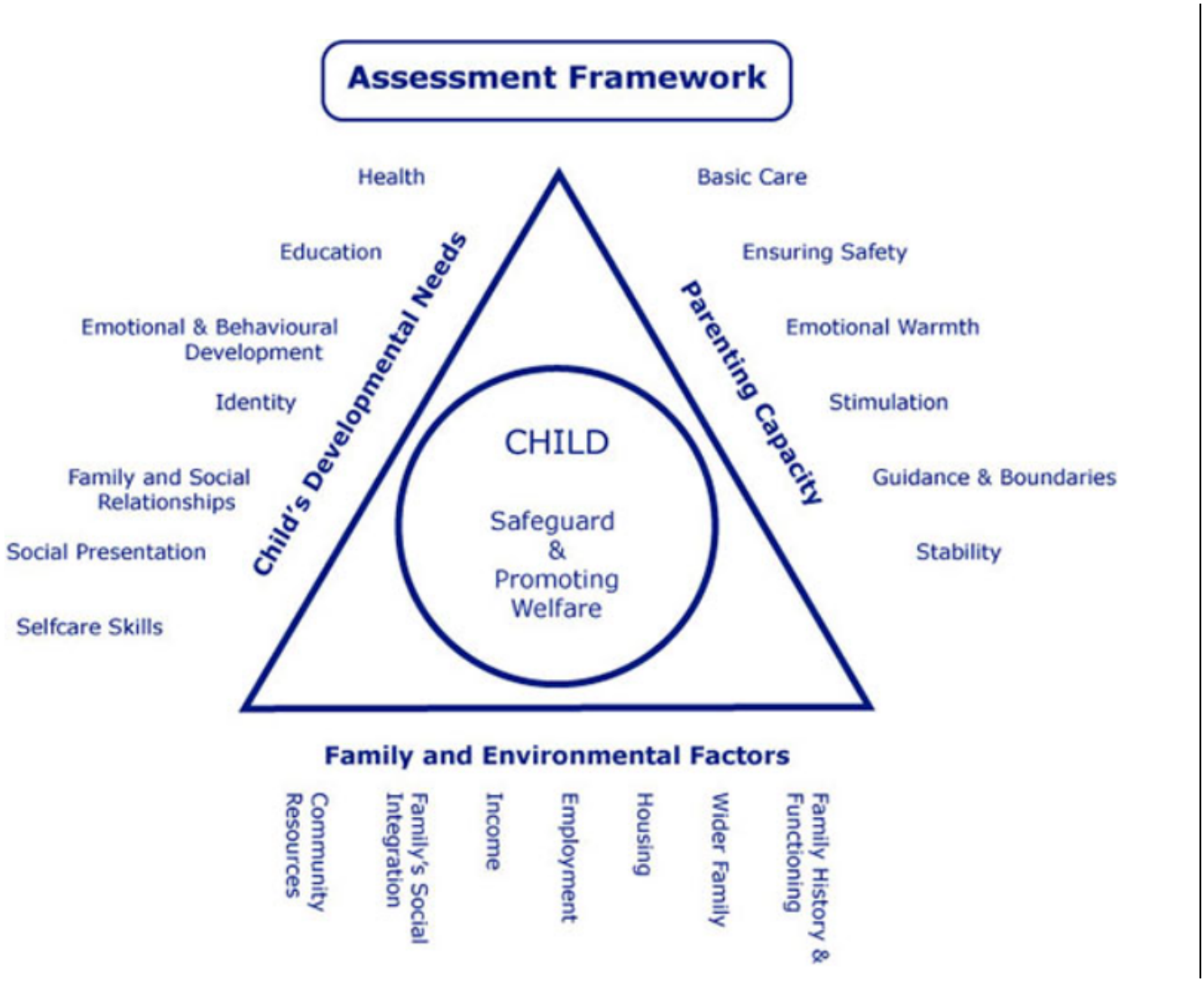
These children require specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or who are disabled. They may require longer-term intervention from specialist services. In some cases these children's needs may be secondary to the adults needs. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989 although the assessments and services required may come from a range of provision outside of children's social care.

Tier 4: Children in acute need

These children are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes. Their needs may not be considered by their parents. This tier also includes Tier 4 health services which are very specialised services in residential, day patient or outpatient settings for children and adolescents with severe and /or complex health problems. This is likely to mean that they may be referred to children's social care under section 20, 47 or 31 of the Children Act 1989. This would also include those children remanded into custody and statutory youth offending services.

The Assessment Triangle

The assessment triangle below should be used to identify the interplay between the three domains to assess the child's needs and form a judgement regarding the level of need.



London Safeguarding Children's Partnership: Thresholds – continuum of need matrix

(The LSCP document still uses the term peer-on-peer abuse whereas we now use the term child-on-child abuse)

HEALTH			
Level 1	**Level 2**	**Level 3**	**Level 4**
The child appears healthy, and has access to and makes use of appropriate health and health advice services	The child rarely accesses appropriate health and health advice services, missing immunisations.	There is no evidence that the child has accessed health and health advice services and suffers chronic and recurrent health problems as a result. Diagnosed with a life-limiting illness.	The child has complex health problems which are attributable to the lack of access to health services. Carer denying professional staff access to the child.
All child's health needs are met by parents.	Additional help required to meet health demands of the child including disability or long term serious illness requiring support services.	With additional support, parent not meeting needs of child's health. Carer displays high levels of anxiety regarding child's health.	Carers' level of anxiety regarding their child's health is significantly harming the child's development. Strong suspicions / evidence of fabricating or inducing illness in their child.
Carer does not have any additional needs.	Needs of the carers are affecting the care and development of the child	Needs of the carer / other family members significantly affect the care of child.	
Parent accesses ante-natal and/or post-natal care	The carer demonstrates ambivalence to ante-natal and post-natal care with irregular attendance and missed appointments.	The carer is not accessing ante- natal and/ or post-natal care, significant concern about prospective parenting ability, resulting in the need for a pre-birth assessment.	The carer neglects to access ante-natal care and there are accumulative risk indicators.
The parent is coping well emotionally following the birth of their baby and accessing universal support services where required.	The parent is struggling to adjust to the role of parenthood, post- natal depression is affecting parenting ability.	The parent is suffering from post-natal depression. Infant / child appears to have poor growth - Growth falling 2 centile ranges or more, without an apparent health problem. Newborn affected by maternal substance misuse.	The carer is suffering from severe post-natal depression which is causing serious risk to themselves and their child/ children.

HEALTH			
Level 1	**Level 2**	**Level 3**	**Level 4**
Pregnancy with no apparent safeguarding concerns	Pregnancy in a young person / vulnerable adult who is deemed in need of support.	LAC or Care Leaver or vulnerable young person who is pregnant.	Pregnancy in a child under 13 or parent with significant learning needs. Young inexperienced parents with additional concerns that could place the unborn child at risk of significant harm.

MENTAL / EMOTIONAL HEALTH			
Level 1	**Level 2**	**Level 3**	**Level 4**
The child is provided with an emotionally warm, supportive relationship and stable family environment providing consistent boundaries and guidance, meeting developmental milestones to the best of their abilities.	Parenting often lacks emotional warmth and/or can be overly critical and/or inconsistent, occasional relationship difficulties impacting on the child's development. Struggles with setting age appropriate boundaries, occasionally not meeting developmental milestones and occasionally prioritises their own needs before child's.	Carers inability to engage emotionally with child leads to developmental milestones not met. Family environment is volatile and unstable resulting in a negative impact on the child, leading to possible vulnerabilities and exploitative relationships, parent/ carer unable to judge dangerous situations / set appropriate boundaries. Allegations parents making verbal threats to children. Child rarely comforted when distressed / under significant pressure to achieve / aspire.	Relationships between the child and carer have broken down to the extent that the child is at risk of significant harm / frequently exposed to dangerous situations and development significantly impaired. Child has suffered long term neglect due to lack of emotional support from parents.

MENTAL / EMOTIONAL HEALTH			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child has good mental health and psychological wellbeing.	The child has a mild a mental health condition which affects their everyday functioning but can be managed in mainstream schools and parents are engaged with school /health services including accessing remote support services to address this. Child is accessing social media sites related to self-harm, has expressed thoughts of self-harm but no evidence of self-harm incidences. History of mental health condition but have been assessed and discharged home with safety plan and follow up.	The child has a mental health condition which significantly affects their everyday functioning and requires specialist intervention in the community. Parent is not presenting child for treatment increasing risk of mental health deterioration problems as a result No evidence child has accessed mental health advice services and suffers recurrent mental health problems as a result. Child is known to be accessing harmful social media sites to facilitate self-harming. Child self- harms causing minor injury and parent responds appropriately. Child has expressed suicidal ideation with no known plan of intent. Child is under the care of hospital engaging with mental health services.	Child expressed suicidal ideation with intent or psychotic episode or other significant mental health symptoms. Refuses medical care or is in hospital following episode of self-harm or suicide attempt or significant mental health issues. Carer unable to manage child's behaviours related to their mental health increasing the risk of the child suffering significant harm. Child or young person has ongoing suicidal ideation following attempt or is in hospital following episode of self-harm or suicide attempt.
The child engages in age appropriate activities and displays age appropriate behaviours, having a positive sense of self and abilities reducing the risk of those wanting to exploit them.	Child has a negative sense of self and abilities, suffering with low self- esteem and confidence making them vulnerable to those who wish to exploit them resulting in becoming involved in negative behaviour/activities.	Child has a negative sense of self and abilities, suffering with low self-esteem and confidence which results in child becoming involved in negative behaviour / activities by those exploiting / grooming them.	Evidence of exploitation linked to child's vulnerability. Child frequently exhibits negative behaviour / activities that place self or others at imminent risk.

MENTAL / EMOTIONAL HEALTH			
Level 1	**Level 2**	**Level 3**	**Level 4**
Mental health of the carer does not affect / impact care of the child.	Sporadic / low level mental health of carer impacts care of child, however, protective factors in place.	Mental health needs of the carer (subject to a section under MHA) is impacting on the care of their child and there are no supportive networks and extended family to prevent harm. Carer has expressed suicidal ideation with no known plan of intent.	Mental health needs of the carer significantly impacting the care of their child placing them at risk of significant harm. Carer has ongoing suicidal ideation following attempt or is in hospital following episode of self-harm or suicide attempt.
Child has not suffered the loss of a close family member or friend	Child has suffered a bereavement recently or in the past and is distressed but receives support from family and friends and appears to be coping reasonably well – would benefit from short term additional support from early help services.	Child has suffered bereavement recently or in the past and recent there has been a deterioration in their behaviour. Low level support has not assisted, long term intervention required.	Child has suffered bereavement and is missing, self-harming, disclosing suicidal thoughts, risk of exploitation, involvement in gang/criminal activity.
LA notified the child is privately fostered by adults who are able to provide for his/her needs and there are no safeguarding concerns.		Some concern about the private fostering arrangements in place for the child, there may be issues around the carers' treatment of the child. The local authority hasn't been notified of the private fostering arrangement.	There is concern that the child is a victim of exploitation, domestic slavery, or being physically abused in their private foster placement

EDUCATION			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child is in education/training with no barriers to learning. Planned progressions beyond school/college. Behaviour issues are managed by the school.	Child experiences frequent moves between schools or professional concerns re home education. Reports of bullying but responded to appropriately. Peer concerns managed by the school.	Child's attendance is varied with missing absences and exclusions. Recurring issues raised about child's home education. Inappropriate behaviour from carer/school has not been managed.	Child's achievement is seriously impacted by lack of education. Regular breakdown of school placements. Lack of trust in education system (young person or parents/carers). Repeated concerns about school's

EDUCATION			
Level 1	**Level 2**	**Level 3**	**Level 4**
			management of behaviour
Developmental milestones met.	Some developmental milestones are not being met which will be supported by universal services.	Some developmental milestones are not being met which will require support of targeted/specialist services	Developmental milestones are significantly delayed or impaired causing concerns regarding ongoing neglect. (not in the case of those with a disability).
The child possesses age- appropriate ability to understand and organise information and solve problems, and makes adequate academic progress.	The child's ability to understand and organise information and solve problems is impaired and the child is under-achieving or is making no academic progress.	The child's ability to understand and organise information and solve problems is very significantly impaired and the child is seriously under-achieving or is making no academic progress despite learning support strategies over a period of time.	The child's inability to understand and organise information and solve problems is adversely impacting on all areas of his/her development creating risk of significant harm, concerns of carer neglect.
The carer positively supports learning and aspirations and engages with school	The carer is not engaged in supporting learning aspirations and/or is not engaging with the school.	The carer does not engage with the school and actively resists suggestions of supportive interventions.	The carer actively discourages or prevents the child from learning or engaging with the school

ABUSE AND NEGLECT			
Level 1	**Level 2**	**Level 3**	**Level 4**
Carer protects their family from danger/ significant harm.	Carer on occasion does not protect their family which if unaddressed could lead to risk or danger	Carer frequently neglects/is unable to protect their family from danger/significant harm. Parents or carers persistently avoid contact / do not engage with childcare professionals.	Carer is unable to protect their child from harm, placing their child at significant risk. Allegations of harm by a person in a position of trust.
Child shows no physical symptoms which could be attributed to neglect.	Child occasionally shows physical symptoms which could indicate neglect.	Child consistently shows physical symptoms which clearly indicate neglect.	Child shows physical signs of neglect which are attributable to the care provided by their carers.

ABUSE AND NEGLECT			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child has injuries which are consistent with normal childish play and activities.	Child has occasional, less common injuries which are consistent with the parents' account of accidental injury - carers seek out or accept advice on how to avoid accidental injury.	Child has injuries which are accounted for but are more frequent than would be expected for a child of a similar age/needs. Carer does not know how injuries occurred or explanation unclear.	Any allegations of abuse or neglect or any injury suspected to be non-accidental injury to a child. Repeated allegations or reasonable suspicion of non- accidental injury. Any allegation of abuse/suspicious injury in a pre- mobile or non-mobile child. Child has injuries more frequently which are not accounted and the child makes disclosure and implicates parents or older family members.
Carer does not physically harm their child including physical chastisement.	Carer uses physical assault (no injuries) as discipline but is willing to access professional support to help them manage the child's behaviour.	Carer uses physical assault (injuries) as discipline but is willing to access professional support to help them manage the child's behaviour.	Carer uses an implement causing significant physical harm to a child
No concerns re conflict / tensions within the family.	Concerns re ongoing conflict between family and child.	Family is experiencing a crisis likely to result in the breakdown of care arrangements - no longer want to care for child	Family have rejected / abandoned / evicted child. Child has no available parent and the child is vulnerable to significant harm. Child not living with a family member
No concerns of inappropriate self-sufficiency	Pattern emerging of self- sufficiency which is not proportionate to a child/young person's age and stage of development	High level of self-sufficiency is observed in a child/young person that is not proportionate to a child/young person's age and stage of development.	Inappropriate, high level of self-sufficiency for child/young person's age and stage of development resulting in neglect.
No concerns of fabricated or induced illness.	Child has an increased level of illnesses with the causes unknown	Suspicion child has suffered or is at risk of fabricated or induced illness.	Medical confirmation that a child has suffered significant harm due to fabricated or induced illness.

SEXUAL ABUSE / ACTIVITY			
Level 1	**Level 2**	**Level 3**	**Level 4**
Nothing to indicate child is being sexually abused by their carer.	Concerns relating to inappropriate sexual behaviour / abuse within the family / network but does not amount to a criminal offence.	Allegation of non-recent sexual abuse but no longer in contact with perpetrator.	Concerns re possible inappropriate sexual behaviour from carer / carer sexually abuses their child. Offender who has risk to children status is in contact with Family. Child who lives in a household into which a registered sex offender or convicted violent offender subject to MAPPA moves.
Good knowledge of healthy relationships and sexual health.	Emerging concerns of possible sexual activity of a child.	Suspicions of peer on peer sexual activity in a child over 13 years old. Child under 16 is accessing sexual health and contraceptive services.	Suspicions of sexual abuse / sexually activity of a child. Direct allegation of sexual abuse/assault by child and belief that child is in imminent danger and in need of immediate protection.
Good knowledge of healthy relationships and sexual health.	Single instance of sexually inappropriate behaviour.	Send/receive inappropriate sexual material produced by themselves or other young people via digital or social media, considered as peer-on-peer abuse. Evidence of concerning sexual behaviour – accessing violent / exploitative pornography.	Child is exhibiting harmful, sexual behaviour. Early teen pregnancy. Risk taking sexual activity.
Good knowledge of healthy relationships and sexual health.	Age appropriate attendance at sexual health clinic.	Sexually transmitted infections (STI's). Consent issues may be unclear. Verbal or non-contact sexualised behaviour. Historic referrals in regard concerning sexual behaviour.	Multiple / untreated sexually transmitted infections (STI's). Concerning sexual activity (behaviour that is upsetting to others). Allegations of non- penetrative abuse. Harmful sexual behaviour. Child exploited to recruit others into sexual activity. Repeated pregnancy, miscarriages and/or terminations. Increase in severity of concerning sexual behaviour.

POLICE ATTENTION			
Level 1	**Level 2**	**Level 3**	**Level 4**
There is no history of criminal offences within the family.	History of criminal activity within the family including gang involvement, child has from time to time been involved in anti-social behaviour.	Family member has a criminal record relating to serious or violent crime, known gang involvement, child is involved in anti-social behaviour and may be at risk of gang involvement, early support not having the desired impact. Starting to commit offences/re-offend or be a victim of crime.	Re-occurring / frequent attendances by the police to the family home. Family member within household's criminal activity significantly impacting on the child, child is currently involved in persistent or serious criminal activity and /or is known to be engaging in gang activities leading to injury caused by a weapon.
Young person has no involvement with crime or anti- social behaviour.	Child is vulnerable and at potential risk of being targeted and/or groomed for criminal exploitation, gang activity or other criminal groups/associations.	Child appears to be actively targeted/coerced with the intention of exploiting the child for criminal gain.	Child habitually entrenched / actively criminally exploited. There is a risk of imminent significant harm to the child as a result of their criminal associations and activities. They may not recognise they are being exploited and/or are in denial about the nature of their abuse.
Young person has no involvement with crime or anti- social behaviour.	Attention of ASB team or police. Talks about carrying a weapon. Reports from others that involved in named gang. Glamorises criminal or violent behaviour.	Arrested for possession of offensive weapon, drugs, multiple thefts / going equipped / motoring offences. Non-compliance of conditions.	Charged or convicted of Aggravated Robbery/Use of offensive weapon/ possession of large quantities of Class A drugs. Intentional harm of others / animals.
Young person has been stopped but not searched. Young person has been stopped and searched with no obvious safeguarding concerns or criminality.	Young person has been stopped and searched in circumstances that cause concern such as time of day and others present but no previous concerns.	Young person regularly stopped and searched indicating vulnerability, exploitation or criminality. Young person arrested as a result of a stop and search.	Young person consistently stopped and searched with risk factors suggested they are being exploited.

HARMFUL PRACTICES			
Level 1	**Level 2**	**Level 3**	**Level 4**
There is no concern the child may be subject to harmful traditional practices.	Concern the child is in a culture where harmful practices are known to have been performed however parents are opposed to the practices in respect of their children.	Concern the child may be subject to harmful traditional practices.	Evidence the child may be subject to harmful traditional practices.
There are no concerns that the child is at risk of Honour Based Violence.	There are concerns that a child may be subjected to Honour Based Violence.	There is evidence to indicate the child is at risk of Honour Based Violence.	There is specific evidence to indicate a child has been subjected to Honour Based Violence or the child has reported they have been subjected to Honour Based Violence.
There are no concerns that the child is at risk of Female Genital Mutilation.	History of practising Female Genital Mutilation within the family including female child is born to a woman who has undergone Female Genital Mutilation, older sibling/cousin who has undergone Female Genital Mutilation. Family indicate that there are strong levels of influence held by elders and/or elders are involved in bringing up female children. Female child where Female Genital Mutilation is known to be practiced is missing from education for a period without school's approval.	Any female child born/unborn to a mother who has had Female Genital Mutilation and is from a prevalent country, family believe Female Genital Mutilation is integral to cultural or religious identity. Female child talks about a long holiday / confirmed travel to her country of origin or another country where the practice is prevalent. Female child or parent from household where Female Genital Mutilation is known or suspected to have previously been a factor state that they or a relative will go out of the country for a prolonged period with female child.	Reports that female child has had Female Genital Mutilation/ child requests help as suspects she is at risk of Female Genital Mutilation. Upon return from country where practice is prevalent, noticeable changes in child – dress code, excusing from PE, discomfort in walking, frequenting toilet facilities.
There are no concerns a child is at risk of Forced Marriage.		There are concerns that a child may be subjected to Forced Marriage.	Evidence child may be subject to forced marriage or has been subjected to Forced Marriage.

HARMFUL PRACTICES			
Level 1	**Level 2**	**Level 3**	**Level 4**
There are no concerns that the child is at risk of witchcraft.	Suspicion child is exposed to issues of spirit possession or witchcraft.	Evidence child is exposed to issues of spirit possession or witchcraft.	Disclosure from child about spirit possession or witchcraft, parental view that child is believed to be possessed.

EXTREMISM & RADICALISATION			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child and family's activities are legal with no links to proscribed organisations	Child makes reference to own and family ideologies.	The child expresses sympathy for ideologies closely linked to violent extremism but is open to other views or loses interest quickly. Child and family have indirect links to proscribed organisations.	The child expresses beliefs that extreme violence should be used against people who disrespect their beliefs and values. The child supports people travelling to conflict zones for extremist/ violent purposes or with intent to join terrorist groups The child expresses a generalised non- specific intent to go themselves. Child, family and friends have strong links / are members of proscribed organisations.
Child doesn't express support for extreme views or is too young to express such views themselves.	Child makes reference to own and family extreme views.	A child is known to live with an adult or older child who has extreme views. Child may inadvertently view extremist imagery.	A child is sent extreme imagery / taken to demonstrations or marches where violent, extremist and/or age inappropriate imagery or language is used. The child/carers/ close family members / friends are members of prescribed organisations, promoting the actions of violent extremists and/or saying that they will carry out violence in support of extremist views including child circulating violent extremist images.

EXTREMISM & RADICALISATION			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child engages in age appropriate use of internet, including social media	Child is at risk of becoming involved in negative internet use that will expose them to extremist ideology, expressing casual support for extremist views.	Child is known to have viewed extremist websites and has said s/he shares some of those views but is open about this and can discuss the pros and cons or different viewpoints.	Child is known to have viewed extremist websites and is actively concealing internet and social media activities. They either refuse to discuss their views or make clear their support for extremist views. Significant concerns that the child is being groomed for involvement in extremist activities.
Child engages in age appropriate activities and displays age appropriate behaviours and self- control.	Child is expressing strongly held and intolerant views towards people who do not share their religious or political views.	Child is refusing to co-operate with activities at school that challenge their religious or political views, they are aggressive and intimidating to others who do not share their religious or political views.	Child expresses strongly held beliefs that people should be killed because they have a different view. Child is initiating verbal and sometimes physical conflict with people who do not share their religious or political views.
Child engages in age appropriate activities and displays age appropriate behaviours and self- control.	The child is expressing verbal support for extreme views some of which may be in contradiction to British law.	Concerns child has connections to individuals or groups known to have extreme views and they are being educated to hold intolerant, extremist views	Child has strong links and involved in activities and being educated by those with individuals or groups who are known to have extreme views / links to violent extremism.

DRUG / SUBSTANCE MISUSE			
Level 1	**Level 2**	**Level 3**	**Level 4**
The child has no history of substance misuse or dependency.	The child is known to be using drugs and alcohol frequently with occasional impact on their social wellbeing.	The child's substance misuse dependency is affecting their mental and physical health and social wellbeing - Child presents at hospital due to substance / alcohol misuse. Carer indifferent to underage smoking / alcohol / drugs etc	The child's substance misuse dependency is putting the child at such risk that intensive specialist resources are required
Carers/other family members do not use drugs or alcohol or the use does not	Drug and/or alcohol use is impacting on parenting but adequate provision is	Drug/alcohol use has escalated to the point where the child is worrying about	Carer/other family members drug and/or alcohol use is at a problematic level and

DRUG / SUBSTANCE MISUSE			
Level 1	**Level 2**	**Level 3**	**Level 4**
impact on parenting.	made to ensure the child's safety, concerns this may increase if continues.	their carer/family member.	are unable to provide care to child.
No signs or suspicion of drug usage	Child or household member found in possession of Class C drugs	Previous concerns of drug involvement / drug supply and child or household member found in possession of Class A or Class B drugs / drug paraphernalia found in home.	Family home is used for drug taking / dealing / illegal activities.
No signs or suspicion of drug usage	Concerns of drug usage during pregnancy	Evidence of substance/drug misuse during pregnancy – pre 21 weeks gestation.	Evidence of substance/drug misuse during pregnancy – post 21 weeks gestation.

DISABILITY			
Level 1	**Level 2**	**Level 3**	**Level 4**
Carers / other family members have disabilities which do not affect the care of their child.	Carers / other family members have disabilities which occasionally impedes their ability to provide consistent patterns of care but without putting the child at risk, additional support required.	Carers / other family members have disabilities which are affecting the care of the child.	Carers / other family members have disabilities which are severely affecting the care of the child and placing them at risk of significant harm
Child has no apparent disabilities.	Additional help required to meet health demands of the child's disabilities.	Parents unable to fully meet the child's needs due disability needs, requiring significant support under CIN Plan.	Carers Child's disability needs not being met - neglectful

YOUNG CARER			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child does not have caring responsibilities.	Child occasionally has caring responsibilities for members of their family and this sometimes impacts on their opportunities.	Child is regularly caring for another family member resulting in their development and opportunities being adversely impacted by their caring responsibilities.	Child's outcomes are being adversely impacted by their unsupported caring responsibilities.

DOMESTIC ABUSE			
Level 1	**Level 2**	**Level 3**	**Level 4**
Expectant mother or parent is not in an abusive relationship.	Expectant mother or parent is a victim of occasional or low-level non physical abuse.	Expectant mother or parent has previously been a victim of domestic abuse and is a victim of occasional or low-level non- physical abuse	Expectant mother or parent is a victim of domestic abuse which has taken place on a number of occasions
No history or incidents of violence, emotional abuse / economic control or controlling or coercive behaviour in the family.	There are isolated incidents of physical / emotional abuse / economic control or controlling or coercive behaviour in the family, however mitigating protective factors within the family are in place. Even if children reported not to be present when incidents have occurred.	Children suffering emotional harm when witnessing physical / emotional abuse / economic control / coercive and controlling behaviour within the family. Perpetrator/s show limited or no commitment to changing their behaviour and little or no understanding of the impact their behaviour has on the child.	Evidence suggesting child is directly subjected to verbal abuse, derogatory titles, threatening and/or coercive adult behaviours. Child suffering emotional harm and possibly physical harm when witnessing / involved with physical / emotional abuse / economic control / coercive and controlling behaviour within the family especially if they are trying to protect the adult victim. Frequency of incidents increasing in severity / duration
	Information has become known that a person living in the house may be a previous perpetrator of domestic abuse, although no sign of current or recent abuse is apparent.	Confirmation previous domestic abuse perpetrator residing at property. Carer minimises presence of domestic abuse in the household contrary to evidence of its existence.	Serious threat to parent's life or to child by violent partner. Child injured in domestic violence incident. Child traumatised or neglected due to a serious incident of DV or child is unborn.

SOCIAL DEVELOPMENT			
Level 1	**Level 2**	**Level 3**	**Level 4**
Child has good quality early attachments, confident in social situations with strong friendships and positive social interaction with a range of peers, demonstrating positive	Child has few friendships and limited social interaction with their peers. Child has communication difficulties and poor interaction with others. Child exhibits aggressive, bullying or	Child is isolated and refuses to participate in social activities, interacting negatively with others including aggressive, bullying or destructive behaviours, early support	Child is completely isolated, refusing to participate in any activities, positive interaction with others is severely limited due to displays of aggressive, bullying or destructive behaviours

SOCIAL DEVELOPMENT			
Level 1	**Level 2**	**Level 3**	**Level 4**
behaviour and respect for others.	destructive behaviours which impacts on their peers, family and/or local community. Support is in place to manage this behaviour. Child is a victim of discrimination or bullying.	has been refused, or been inadequate to manage this behaviour. Child has experienced persistent or severe bullying which has impacted on his/her daily outcomes. Child has significant communication difficulties.	impacting on their wellbeing or safety. Child has experienced such persistent or severe bullying that his/her wellbeing is at risk. Child has little or no communication skills
There is a positive family network and good friendships outside the family unit.	There is a significant lack of support from the extended family network which is impacting on the parent's capacity.	There is a weak or negative family network. There is destructive or unhelpful involvement from the extended family. Child has multiple carers; may have no significant or positive relationship with any of them/child has no other positive relationships.	The family network has broken down or is highly volatile and is causing serious adverse impact to the child
Child engages in age appropriate use of internet, gaming and social media.	Child is at risk of becoming involved in negative internet use, lacks control and is unsupervised in gaming and social media applications	Child is engaged in or victim of negative and harmful behaviours associated with internet and social media use or is obsessively involved in gaming which interferes with social functioning. Evidence of sexual material being shared without consent. Multiple SIMs or phones.	Child is showing signs of being secretive, deceptive and is actively concealing internet and social media activities. Regularly coerced to send / receive indecent images. Coerced to meet in person for sexual activity. Devices need to be removed and access restricted at all times
The family feels integrated into the community.	The family is chronically socially excluded and/ or there is an absence of supportive community networks.	The family is socially excluded and isolated to the extent that it has an adverse impact on the child	The family is excluded and the child is seriously affected but the family actively resists all attempts to achieve inclusion and isolates the child from sources of support.
The neighbourhood is a safe and positive environment encouraging good citizenship and knowledgeable about the effects of crime and anti-social behaviour.	Child is affected and possibly becoming involved in low level anti-social behaviour in the locality due to others engaging in threatening and intimidating behaviour	The neighbourhood or locality is having a negative impact on the child resulting in the child coming to notice of the police on a regular basis both as a suspect and a victim, concerns by others re exploitation.	The neighbourhood or locality is having a profoundly negative impact on the child resulting in the child coming to notice of the police on a regular basis both as a suspect and a victim, concerns by others re high risk of exploitation,

SOCIAL DEVELOPMENT			
Level 1	**Level 2**	**Level 3**	**Level 4**
			being groomed and any other criminal activity.
Child and family is legally entitled to live in the country indefinitely and has full rights to employment and public funds.	Child and family's legal entitlement to stay in the country is temporary and/or restricts access to public funds and/or the right to work placing the child and family under stress.	Child and family's legal status puts them at risk of involuntary removal from the country / having limited financial resources/no recourse to public funds increases the vulnerability of the children to criminal activity.	Evidence a child has been exposed or involved in criminal activity to generate income for the family / family members are being detained and at risk of deportation or the child is an unaccompanied asylum-seeker.
Young person is positively engaging with services. Has awareness of the risks and grooming processes. Motivated and positive outlook.	Perceived inability or reluctance to access more mainstream support. Reduced access due to their ethnicity / cultural background / being in care / Identifying as LGBTQ / Educational Needs (SEN).	Isolated and refuses to participate in activities. Experiencing bullying or social isolation that may be exacerbated by personal, cultural, sexual identity or education needs. Targeted by groups or individuals due to their vulnerability or perceived reputation.	Negative sense of self and abilities that risk of causing harm. Completely isolated, refusing activities. High levels of social isolation that may be exacerbated by personal, cultural, sexual identity or education needs.

EXTRA-FAMILIAL HARM			
Level 1	**Level 2**	**Level 3**	**Level 4**
Places / Spaces			
Good services in area and young person is aware / engaging positively. Guardians in area ensure physical and psychological wellbeing of young people.	Spending time in areas known for antisocial behaviour or where more vulnerable. Child/ young person identifies and informs professionals of unsafe locations and reason for this.	The neighbourhood or locality is having a negative impact on the child. Frequently spending time in locations, including online, where they can be anonymous or at risk of experience harm / violence / exploitation.	Found in areas/properties known for exploitation / violence. Taken to hotel / B&B / property with intention of being harmed or harming others. Area having profoundly negative effect on the child.
Peer Group / External Relationships			

EXTRA-FAMILIAL HARM			
Level 1	**Level 2**	**Level 3**	**Level 4**
Peer group engage in positive activities / clubs / communities. The group understands risk and harm. Age appropriate and safe. Peers that have 'turned around' in their journey.	Some indications that unknown adults and/or other exploited children have contact with the child/young person. Some indications of negatively influential peers.	Unknown adults and/or other exploited children/young people associating with the child/young person. Escalation in behaviour of peer group. Accompanied by an adult who is not a legal guardian. Arrested with individuals who at risk of exploitation / violence.	Staying with someone believed to be exploiting them. Person with significant relationship is coercing child / young person to meet and child is sexually or physically abused. Found with adults / high risk individuals out of borough. Is being exploited to 'recruit' others.
Professional Engagement			
Trusted adult in professional network. Impactful engagement. Curious and flexible.	Limited referral history with services. Lack of confidence in worker / service to manage risk or work with adolescents. Multiple workers confused or disagreeing on risk.	Services previously involved and closed; new referral received for similar concerns. Despite attempts, professionals have been unable to engage the young person to date. Several services involved but little change.	History of multiple services / referrals with little change or escalation in risk. Services report unable to keep child / young person safe.
Missing			
Child comes homes on time and does not run away from home. Their whereabouts are always known to their carers and they answer their phone.	Child has run away from home on one or two occasions or not returned at the normal time. Concerns about what happened to them whilst they were away, whereabouts unknown.	Child persistently runs away and/or goes missing, serious concerns about their activity whilst away. Parent does not report them missing. Unable to give explanations for whereabouts.	Child persistently runs away and/or goes missing and does not recognise that he/she is putting him/herself at risk of exploitation, criminal behaviour etc. Pattern of sofa surfing, whereabouts unknown.

Appendix F – School Closure

There are occasions when the School is obliged to close; this closure may occur as a result of an emergency situation or it may be an extraordinary need to close for a significant event. Should such a closure occur during the School's usual term time, the School will move to remote learning. This Appendix sits alongside the School's existing Safeguarding Policy, as well as the Remote Learning Policy, and will apply when the School is closed but in session.

Principles

As far as is reasonably possible, Westminster will take a whole institution approach to safeguarding.

Whilst remote learning is fundamentally different to business as usual, a number of important safeguarding principles remain the same:

- The best interests of children will always continue to come first.
- If anyone has a safeguarding concern about any child then they should continue to act and to act immediately.
- A DSL or a DDSL will always be available.
- It is essential that unsuitable people are not allowed to enter the children's workforce and / or gain access to children, which means that Safer Recruitment principles remain in place.
- Children should continue to be protected when they are online.

This Appendix to the School's Safeguarding Policy contains details of our individual safeguarding arrangements for the identified areas.

Additional risks

The risks which are present in a physical setting are, by and large, equally present in a virtual setting.

There are also added risks including:

- The particular emotional vulnerability of children in an emergency or if the School is obliged to an extraordinary event.
- Potential concerns about family members and friends.
- The potential for increased power imbalance and the challenges of witnessing and addressing that.
- The potential for neglect within the family for reasons of illness, anxiety or work requirements.

The uniqueness of an extraordinary incident combined with the potential informality of virtual learning may unwittingly facilitate culture slippage, where rules which are routinely applied in ordinary circumstances are seen to be irrelevant in a crisis.

Additional safeguarding risks relating to online learning may arise due to:

- Poor technical understanding.
- An intention to abuse.
- Weak online security, poor parental settings on home systems; and patchy parental supervision.

- The greater likelihood of both Youth Produced Sexual Imagery (sexting), and neglect to children where parents are ill, anxious, or busy at work.

In the case of extended remote learning and where there is provision made for pupils to study on site, risks can include the same online risks (although mitigated by the School's built-in securities and firewalls):

- Individual safety.
- Site security.
- Supervision levels and knowing the whereabouts of all children at all times.
- Child-on-child abuse arising from the mixed age group associations being more widespread than in normal school operation.
- Staff being unfamiliar with individual welfare needs and past behaviours.

Contact details

The Safeguarding Team continue to remain available so as to be able to receive and respond to any concerns that might arise. This can be done by email, telephone or video call.

The Safeguarding Team continues to work alongside Children's Services and the LADO.

All members of the Safeguarding Team have access to the School site and any relevant files and documentation, should the need arise.

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who are subject to a Child Protection Plan, a Child in Need Plan and those who are looked after by the Local Authority. Westminster will continue to work with and support children's social workers to help protect vulnerable children.

The Master, DSL and DDSLs know who our most vulnerable children are: they also have the flexibility to offer support to those on the edge of receiving children's social care support. The School expects all pupils to attend the School remotely and, where it is deemed to be appropriate, will encourage vulnerable children to attend physically. If the expectation is that a vulnerable pupil will attend the School physically, consideration will be given as to whether the pupil has any underlying health conditions that put them at risk and will be subject to the formal agreement with the child's social worker. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the School will explore the reasons for this directly with the parent. The School will ensure that all professionals (e.g.: social workers, SEND case workers, Early Help workers etc.) involved with these vulnerable children are fully informed around the current attendance of the child (attending School or not, either remotely or physically) and if not attending School, the arrangements that have been put in place around safeguarding the child.

Registration and attendance

The School will continue to record day-to-day and lesson-by-lesson attendance. Absences will be reported as is usual and any unexplained absences will be followed up.

Vulnerable children, whether attending physically or virtually (including Looked After Children, Children subject to a Child Protection Plan and Children subject to a Child in Need Plan) and who are absent, will result in the School contacting the relevant Children's Services and providing the following details:

- School name and DSL details.
- Full name of child.
- Date of birth of child.
- When the child was last seen by School staff.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the School's Safeguarding Policy.

Where staff are concerned about an adult working with children at the School, they should continue to follow the normal procedures and notify the Master immediately or the Chair of Governors if the matter concerns the Master.

If there is an immediate concern or the relevant person is not available, then it is appropriate to contact the Police and / or the Local Authority.

Safeguarding training

All existing staff have had safeguarding training and have read Part 1 of Keeping Children Safe in Education (2025). The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter the School, they will continue to be provided with a safeguarding induction, which may be provided online or face-to-face.

Safer recruitment / Volunteers

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the School will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in Part 3 of KCSIE (2025).

Where volunteers are deployed, the School will continue to follow the checking and risk assessment process as set out in the relevant sections of KCSIE (2025). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The School will continue to follow its legal duty to refer to the DBS where appropriate, in line with advice from the LADO, anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

The School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as set out in the relevant section of KCSIE (2025) and the TRA's "Teacher misconduct advice for making a referral".

It is essential from a safeguarding perspective that the School is aware, on any given day, which staff / volunteers will be in School, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the School will continue to keep the single central record (SCR) up to date as outlined in the relevant section of KCSIE. The SCR can also be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

Online safety through School systems and in School

The School will continue to provide a safe environment, including when working online. This includes the use of appropriate filters and online monitoring systems applied to the School's online platforms, through which all School business must be conducted.

Where children are using computers in School, appropriate supervision will be in place.

The School will ensure that any use of online learning tools and systems is in line with privacy and GDPR requirements.

Appropriate levels of security protection procedures are in place, in order to safeguard the School's systems, staff and pupils: these measures are reviewed periodically to keep up with evolving cyber-crime technologies

Online safety away from School

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. To report any such concerns, staff should continue to follow the process outlined in the School's Safeguarding Policy; where appropriate, referrals should still be made to Children's Services and, as required, the Police.

Pupils will be briefed on how to keep themselves safe when online, reporting matters to members of staff or using the following websites:

- Childline for support: https://www.childline.org.uk/
- UK Safer Internet Centre to report and remove harmful online content: https://reportharmfulcontent.com/
- CEOP for advice on making a report about online abuse: https://www.ceop.police.uk/safety-centre/

Additionally, pupils will be referred to the Acceptable Use of Computer Network by Pupils Policy

Code of Conduct for Staff

Professional judgment coupled with the Code of Conduct for Staff should prevail when staff consider how to conduct themselves: this approach also applies to online interaction.

The Director of Teaching and Learning leads on matters related to remote teaching and the School's Remote Learning Policy gives clear advice and guidance. The following expectations are to be observed when engaging in virtual lessons and especially where webcams are involved.

Environment and dress

- Pupils and staff should have a workspace that is quiet, safe and free from distractions.
- Pupils and staff should work from a computer that has a strong internet connection and video-conferencing functionality.
- Any computers used should be in appropriate professional spaces (e.g.: not in bathrooms).
- When video-calling, pupils and staff should select an appropriate professional background or blur their background in order to ensure privacy. Video backgrounds are not permitted.
- Staff and pupils must wear appropriate clothing for video-calls, as should anyone else in the household who might be visible.
- Other than the staff and the pupil, no other member of the household should be in attendance during lessons or activities, except by prior arrangement and with the explicit permission of all parties.

Behaviour

- All participants in any online video-call should be visible, except when specifically instructed for video to be disabled.
- Participants should use a formal and respectful register to communicate, at all times (including anyone else in the household who might be audible or visible on a video-call).
- Always take time to listen to others, give others time to speak, and avoid talking at the same time.
- Follow the leadership and direction of the teacher.
- Live classes and images are not to be recorded, except with the explicit permission of all relevant parties and only for the purposes of examination assessment.
- Any behaviour or comments that are inappropriate should be reported to the Housemaster, or, in the case of a safeguarding concern, to the Designated Safeguarding Lead.
- If pupils have individual questions or concerns about their learning, they should let the teacher know in an email or through the one-to-one 'Chat' function on Zoom or Microsoft Teams. 'Chats' between individuals are not visible to the whole class or Team. All 'Chats' can be monitored by Westminster's IT Support.
- If a one-to-one video-call is necessary, this should be formally scheduled between the pupil and teacher, another member of staff cc-ed in so that they can also attend.

Timetable and platforms for learning

- Staff and pupils should adhere to the published timetable and Almanack for lessons and events.
- Only online platforms provided by the School should be used for communication between members of staff and pupils: these are MS Office 365 and Zoom (as accessed through MS Office 365 or the Intranet).

Expectations of households where pupils are working

Pupils need to be able to work in a workspace that is quiet, safe and free from distractions. Pupils will need access to a computer that has wireless access and video-conferencing facilities.

It is not expected that other members of the household will be in attendance or take part in a scheduled session with a member of staff, unless a separate meeting has been specifically arranged.

It is not appropriate for parents to record, share or comment in any public or closed forum about individual pupils or members of staff.

Supporting children when they are not in School

Physical wellbeing

Protracted periods of time sitting in front of a computer are not healthy. All members of the community should seek to break up their screen-time, taking breaks regularly away from the screen.

Pupils on the edge of social care support

The School is committed to ensuring the safety and wellbeing of all of its pupils.

Where the DSL has identified a pupil to be on the edge of social care support, or who would normally receive enhanced levels of pastoral-type support in School, housemasters in discussion with the DSL will ensure that a robust communication plan is in place for that child. The communication plan could include: strategic remote contact, telephone contact and door-step visits.

Emotional welfare

The School recognises that it has a role to play in protecting the welfare of its pupils and that being away from School can affect the mental health of pupils, their parents / guardians and their families. Staff need to be aware of this in setting expectations of pupils' work and of the way in which they interact with pupils and their families.

Supervising pupils on-site

The School will ensure that where vulnerable children are on site, it will provide appropriate support, ensuring that appropriate staff are on site and that the staff to pupil ratio numbers are appropriate, to maximise safety.

Child-on-child abuse

Where the School receives a report of child on child abuse, the principles as set out in KCSIE (2025) and those outlined within the School's Safeguarding Policy will be followed. The School will listen and work with the young person, parents and any multi-agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded, and appropriate referrals made.

Pupils returning to School after absence

Having been away from School for some time and with pupils and staff only engaging remotely, it is likely that staff will notice some change in the way that pupils present. Typically, colleagues will pick up on small changes in behaviour or outlook, but it is likely that some subtle changes will not be at all obvious. As such, the level of pastoral engagement with pupils will need to be more exploratory and potentially more searching than usual, with direct questions asked about health and wellbeing. For those who have a safeguarding profile, it is especially important that sensitive questions are raised.

Handling concerns

Staff (and, indeed, pupils) may identify new safeguarding concerns about individual children as they see one another in person following the School's closure. As usual, any concerns should be shared with a member of the Safeguarding team and advice sought, if necessary. It continues to be the case that staff must act immediately on any safeguarding concerns that might arise.

The process for sharing information about child on child abuse remains the same as in Appendix F.

If staff have concerns about a staff member or volunteer who may pose a safeguarding risk to children, staff should follow the same arrangements as outlined in main policy under the heading "Concerns about / allegations against a member of staff".

Sharing information

Form Tutors will continue to engage with parents about the welfare of pupils, so as to inform any conversations that are taking place with pupils. Any lower level concerns will be picked up by the Assistant Master, Pastoral, discussing pupils in at-least weekly meetings.

A PUPIL GUIDE ON HOW TO STAY SAFE

IF YOU HAVE A CONCERN

Most of the things that concern you at School, either about you or other pupils, are likely to be sorted out informally before they become major problems. We hope that you feel able to share any worries about work with your teachers or your parents.

There may, however, occasionally be other problems, which could require you speaking to other people. For example:

- You may feel that you are being unfairly treated by a pupil, a member of staff or someone outside of School.
- You may feel that you are the victim of verbal, physical or other types of abuse inside or outside of School.
- You may have concerns for the welfare of another pupil – this may be because of things you have heard or seen or been told.
- You may be worried about things that happen online, such as unkind messages in chats or the way online behaviour is affecting you or others.

It is important that you feel able to share concerns such as these with us so that, where necessary, we can work together to sort out any misunderstanding or to take action to help that person.

COUNSELLING

You may drop in to Talking Spaces at break or lunch times without an appointment to see Mrs Lois Adams, our School Counsellor. She is in School on Tuesdays, Thursdays and Fridays. Outside of these times, her email address is tess.bhokanandh@westminster.org.uk and she will get back to you as quickly as possible.

OTHERS WHO CAN HELP

Away from School, other organisations can help, and exist to support children experiencing difficulties:

Childline
– 0800 1111

childline
ONLINE, ON THE PHONE, ANYTIME

Place2Be (Mental Health)
– text SHOUT to 85258

Place 2Be Improving children's mental health

Young Minds (Mental Health)
– text YM to 85258

YOUNGMINDS

HOW WE CAN HELP

If you have a concern, there are plenty of **adults** who would be happy to listen and give advice:

- Your Form Tutor, Head of Year or the Assistant Master, Pastoral (Mrs Kullmann)
- Any other member of staff you trust or get along with
- Your parents

There are also other **pupils** who might be able to offer advice, including Form Captains, Heads of House, Prefects or members of your House Family.
You could also contact the following people:

- The Deputy Master and Designated Safeguarding Lead, Mr Michael Woodside.
- Any other member of the Safeguarding Team: Ms Hayley Wellman, Mr Thomas Dumas, Mrs Harriet Lindley and Mr Peter Lawson. You can see them in person at any point in the School day or you can email them in advance.
- If you prefer not to say something face-to-face, you can email worriedatwus@westminster.org.uk, either about you or another pupil and someone will get back to you as quickly as possible.

CONFIDENTIALITY

Your welfare, and that of other children, is **always** the main concern for the School. This means that any person with whom you may share your concerns **must** bring these to the attention of the right people if they view them to be serious.

In the first instance this is likely to be with Mr Michael Woodside, as the School's Designated Safeguarding Lead, or another member of the Safeguarding Team.

You can be assured that once your concern is shared with someone at the School, every effort will be made to work with you to sort it out swiftly and sensitively and we will only tell the people who need to know.

MJW, September 2025
Drawings by Laurence Vavrovsky, 8L, 2020-21

Appendix H – DSLs and DDSLs at Westminster School

Designated Safeguarding Lead (DSL):
James Kazi, The Under Master
E: james.kazi@westminster.org.uk
T: 020 7956 1078
M: 07889 299075
A: Westminster School, Little Dean's Yard, Westminster, LONDON. SW1P 3PF.

Deputy DSLs:
Tasos Aidonis, Deptuty Head (Boarding and Upper School)
E: tasos.aidonis@westminster.org.uk
M: 07714 268908

Emma Blakemore, Head of Wellbeing
E: emma.blakemore@westminster.org.uk
T: 020 7667 1543

Arthur Dabrowski, Director of Lower School
E: arthur.dabrowski@westminster.org.uk
T: 020 7667 1529

Dr Gabrielle Ward-Smith, Counselling
E: gabrielle.ward-smith@westminster.org.uk
T: 020 7667 1552

Designated Safeguarding Governor:
Dr Sarah Anderson
E: sarah.anderson@westminster.org.uk

Head Master (for all concerns regarding members of Westminster School staff)
Dr Gary Savage
E: gary.savage@westminster.org.uk
T: 020 7963 1042

Chair of Governors (for all concerns regarding the Head Master)
Mark Batten
E: chairofgovernors@westminster.org.uk

Appendix I – LADO Referrals Indicator Matrix

Please note that LADO indicators can apply to organisations as well as to individuals. The LADO service will analyse referral information to identify organisations that may need additional support with their implementation of safeguarding policies.

Indicators Matrix LADO= Tiers 1-4			
Tier 1: Incident that does not need LADO input but may be a conduct issue.	**Tier 2: Incident which might require logging with LADO but will be 'No Further Action'.**	**Tier 3: Incident which requires consideration of referral to other agency such as police or Ofsted.**	**Tier 4: incident which requires immediate suspension / police referral / arrest / immediate action to protect child.**
Complaint made by parent or carer or comment made by child that does not seem to have any corroborating evidence. There is no injury seen, or witness accounts do not corroborate the allegation, the manager confident this does not meet the threshold for a referral but is intending to investigate further. In such cases the relevant manager may wish to have a consultation discussion with the LADO, and both can make a record of the discussion and agree it will be dealt with internally, in case further information comes to light to question why no formal LADO referral was made. However no names will be used as this does not meet the threshold for a record about a named person to be kept.	Member of staff alleged to have acted or reacted in a way considered inappropriate but not harmful; parental or child complaint about such an incident, to outside agency eg. Ofsted, who have referred to LADO for further enquiries; allegation made but manager believes at this point they can deal with this internally and are checking with LADO for information only. This category also includes volunteers and professionals where there are domestic issues which require them to inform their line manager (for example a section 47 investigation at home) but the employer/manager is clear there are no risks presented by this person in their place of work.	Allegation made which meets the threshold for referral to LADO under the LCPP and appears in the first instance to meet the threshold for referral to Police. Such cases may not always involve serious injury to a child but present as a breach of the position of trust the professional or volunteer was in. A proportion of these types of referral may result in a 'no crime' outcome from police, but the allegations process must be followed as the referring information met the threshold.	Allegation made with credible corroborating evidence, where a child has been injured or harmed. Behaviour by the professional or volunteer which is deemed to be extremely concerning towards the children they are caring for and requires immediate suspension. Allegation by a member of the professional / volunteer's family which is so serious it requires immediate consideration by employer.

	These are incidents where an escalation to a police referral would be considered a disproportionate response. These cases are likely to meet the threshold for a confidential record to be kept by the LADO, with the knowledge of the person concerned and their manager.	Sometimes these referrals do not immediately appear to have a criminal element but the reported actions mean that a regulatory body such as Ofsted, or the National Council for Teaching and Leadership, or HCPC, will need to be informed. It is essential in these cases that there is a clear outcome and this is communicated to the professional/volunteer. These referrals can result in a note on future DBS checks and could have an impact on the professional/ volunteer's future career.	
Physical abuse			
Examples could be: child objecting to a sanction imposed in school, describing an event to parent who then comes in to complain about how their child says they have been treated; but does not have all the information. Young person in children's home involved in a confrontation and making accusations where there were several witnesses and there is an incident report that appears to refute the child's account that they were harmed. An allegation that is made second or third hand and facts are not clear, or the professional alleged to have done this was not there at the time; or there is confusion about the account.	Examples could be: child accusing teacher of pushing them, when it appears they were being guided away from a situation (covered by 'Use of Reasonable Force' DfE 2013). Nursery worker seen by parent to be pulling a child away from a situation, parent considers this is done roughly but professional claims it was to remove child from a confrontation where they may have been harmed/ may have harmed another child. Professional or volunteer accused of domestic violence assault on own children but there have never been any concerns at work about him/her.	Examples could be a credible disclosure by a child or young person that uses the word 'hit' or 'hurt'; yet there is no injury seen and no corroborating evidence of child's account. Restraint that has caused an injury to the person being restrained. An incident witnessed, where there is a physical exchange between staff and child or young person. It is unclear whether self defence or retaliation was involved. The matter needs full investigation.	Child has clearly been injured or could have been injured as a direct result of the actions of a professional or volunteer. Incident within the professional / volunteers home life that is of high risk and high level of concern.

Sexual abuse			
A school girl telling a friend, who tells the teacher, that another teacher 'makes her feel funny when he looks at her' but no other concerns or complaints expressed.	A professional or volunteer makes an inappropriate remark that appears on the surface to be naive rather than potentially grooming, or acts in a way that could be deemed unprofessional.	A very young child still requiring personal care/ nappy changing, indicates that a nursery worker touched him/her in the genital area A professional or volunteer has been sending inappropriate but not necessarily sexual, texts to young people he/she works with.	Professional or volunteer arranging to meet young person outside the work environment and asking them not to tell anyone; or making inappropriate contact through social media with sexual overtones.
Emotional abuse/ neglect			
A child with a history of challenging behaviour, alleging s/he feels bullied by a well respected member of staff. Concerns that family members of the professional or volunteer may be involved in criminal activity.	Teacher under stress who is heard to shout inappropriately at the children one day towards the end of term. Childminder witnessed to ignore children crying and speak rudely to them, but further context not known.	A foster carer where there have been several complaints about poor practice and standards of care; children in their care who are not always clean or appropriately dressed or seen to be treated in a way that causes concern to observing professionals. Reference to both safeguarding and fostering standards of care regulations would be needed in this case.	Making racist or derogatory remarks to a child or young person in the presence of witnesses.
Suggestion actions			
Managers to investigate further to satisfy themselves this matter does not meet the threshold for a referral outside the organisation, and identify any appropriate actions.	Investigate further with a clear view that this could be escalated to a full LADO referral if more information comes to light. If no further information is discovered, offer words of advice/ training and make a record of this on the professional or volunteer's personnel file.	Full referral to LADO and consideration of what actions are required under the procedures (which may include other procedures relating to the context such as a school's safeguarding policies or fostering standards of care). This may or may not include referral to police.	Full referral to LADO and consideration what actions are required under the procedures. This will include referral to police.