



Hampton Court House

Safeguarding and Child Protection Policy and Procedures

Reviewed by: Nick Shaw

Approved by Governors at last Governor's Meeting

This policy should be updated whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.



Last Updated: September 2025
Last Approved: 23rd Sept 2025
Review: August 2026

1. Contents

Safeguarding and Child Protection Policy and Procedures.....	1
1. Contents	1
	1

2.	Introduction and policy aims	4
3.	Definitions	4
4.	Key personnel.....	6
	Children’s services.....	7
	Local authority designated officer (LADO).....	8
5.	The law (legislation) and statutory guidance.....	8
6.	Roles and responsibilities.....	10
7.	What to do if you have concerns about a child’s welfare	18
	If a child is in immediate danger, or is suffering or likely to suffer significant harm	19
	Disclosures	19
	Handling a disclosure	19
	Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm.....	20
	If a child has experienced or is at risk of female genital mutilation	21
	Concerns about nudes or semi-nudes	22
	Child-on-child abuse, including sexual violence and sexual harassment	24
	Concerns about mental health	27
	Concerns about extremism and radicalisation	28
	How children can report concerns.....	29
8.	Confidentiality.....	29
9.	Record keeping	30
10.	Concerns or allegations about adults in our school.....	31
11.	Whistleblowing	31
12.	Online safety and the use of smart devices.....	32
13.	Children potentially at greater risk of harm	35
14.	Identified areas of risk for our school.....	37

15.	Lettings and off-site arrangements.....	37
16.	Training	38
17.	Teaching and learning.....	41
18.	Linked policies.....	42
19.	Appendix 1: Types of abuse and specific safeguarding concerns.....	43
	Specific safeguarding concerns.....	44

2. Introduction and policy aims

Hampton Court House School has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do at Hampton Court House School. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

We aim to make sure that:

- The school has a clear process in place, that is shared with and followed by all members of the school community, when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse, neglect and exploitation, such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, other children, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

3. Definitions

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

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

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

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to,

employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

Child means anyone under the age of 18.

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

Statutory means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.


The local safeguarding children partnership has three safeguarding partners:

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

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

Hampton Court House School will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.

4. Key personnel

<p>Designated safeguarding lead (DSL)</p> <p>Nicholas Shaw (Mat cover until Nov 25)</p> <p>nsh@hchnet.co.uk</p> <p>07927584888</p> <p>Amy Burgess (From Nov 25)</p> <p>acb@hchnet.co.uk</p>	<p>Deputy designated safeguarding leads:</p> <p>Susie Byers sby@hchnet.co.uk</p> <p>Katy Deacon kde@hchnet.co.uk</p> <p>Janak Odedra jvo@hchnet.co.uk</p> <p>Talat Khan thk@hchnet.co.uk</p> <p>Imogen Stone ist@hchnet.co.uk</p> <p>Emma Trimmer etr@hchnet.co.uk</p>
<p>Principal</p> <p>Katherine Vintiner</p> <p>kvi@hchnet.co.uk</p>	<p>Safeguarding link governor</p> <p>Rachael Friend</p> <p>rachael.friend@dukeseducation.com</p> <p>Tel 020 3696 5300</p> <p>Mobile 07552 268782</p> 
<p>Chair of governors</p> <p>Aatif Hassan</p> <p>aatif.hassan@dukeseducation.com</p>	<p>Special educational needs and disabilities coordinator (SENDCo)</p> <p>Talat Khan</p> <p>thk@hchnet.co.uk</p>

Designated teacher for children looked after children is the DSL	Dedicated ward officer Hannah Cullen PC 1241SW Email: Hannah.M.Cullen@met.police.uk
--	---

Children's services

Achieving for Children (AfC) single point of access (SPA)

Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the [Single Point of Access \(SPA\)](#) website.

If a child is in **immediate danger**, the police should be contacted on 999.

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

Neighbouring boroughs' MASH/SPA

Hampton Court House has several pupils who live in other boroughs local to the school: contact details for

these boroughs are:

Croydon	020 8726 6400	my.croydon.gov.uk/ChildReferrals
Hounslow	020 8583 6600	
Lambeth	020 7926 5555	dutymanager@lambeth.gov.uk

Surrey	0300 470 9100	https://surreyscp.org.uk/
Sutton	020 8649 0418	mash@sutton.gov.uk
Wandsworth	020 8871 6000	mash@wandsworth.gov.uk

This government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](#)

Go to [section 6](#) of this policy for in-school procedures.

Local authority designated officer (LADO)

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the principal and the chair of governors, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: [LADO referral form](#)

5. The law (legislation) and statutory guidance

In addition to KRSCP's [arrangements](#) and the [London Child Protection Procedures and Practice Guidance](#), Hampton Court House School also follows the laws and statutory guidance below:

[Keeping children safe in education 2025](#), from now on referred to as KCSIE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges. Make sure this link reflects the latest guidance in September 2025.

[Statutory framework for the early years foundation stage 2025](#) sets the standards that all early years providers, such as nurseries, must meet to make sure that children learn and develop well

and are kept healthy and safe.

[Working Together to Safeguard Children 2023](#) guidance produced by the government states how practitioners, such as teachers, social workers, the police and health professionals working with children and families should work together to make sure that children and young people remain safe from harm.

[Education Act 2002](#), Section 175/[The Education \(Independent School Standards\) Regulations 2014/Part 1 of the schedule to the Non-Maintained Special Schools \(England\) Regulations 2015](#) places a duty on independent schools and local authorities to keep children safe and promote their welfare.

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

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

[The Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

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

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

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

6. Roles and responsibilities

1. The Designated Safeguarding Lead

The school has appointed a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), Some of whom are members of the Senior Leadership Team and have the necessary status, training and authority to be responsible for matters relating to the welfare of pupils, including child protection.

In accordance with the Early Years Foundation Stage (“EYFS”) statutory framework, One of our DDSL’s Imogen Stone acts as EYFS DSL responsible for safeguarding in relation to pupils within the EYFS.

Responsibilities of the designated safeguarding lead (DSL) – Nicholas Shaw (Mat Cover until Nov 2025 – Amy Burgess thereafter)

The main responsibilities of the DSL are as detailed in KCSIE **Annex C**, but are also detailed below:

- a) To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the school’s processes and procedures.
- b) To co-ordinate and monitor safeguarding, being the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies.
- c) The designated safeguarding lead should take lead responsibility for safeguarding and child protection.
- d) Immediately upon the receipt of any concerns, to act upon the report.
- e) To liaise with Kingston and Richmond Safeguarding Children’s Partnership (KRSCP) and other neighbouring Children’s Services departments.
- e) To understand child protection processes, including Section 17 and Section 47 assessments under the Children’s Act (1989) and ‘Early Help’ processes.
- f) To ensure the safeguarding governor is informed about safeguarding concerns including any referrals.
- g) To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- h) To be responsible for safeguarding and child protection procedures and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.

- i) To provide a systematic means of monitoring and supporting children / young people known or thought to be at risk of harm or where there are ongoing concerns at school as well as outside or inside the child's home.
- j) To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked after children.
- k) To maintain a regular training programme for all members of staff and volunteers in line with advice from KRSCP.
- l) To ensure all new staff receive induction training in safeguarding and understand their responsibilities as well as have received a copy of KCSIE Part 1 and / or Annex A.
- m) To ensure that all staff and governors have confirmed that they have been provided with, read and understood a copy of the Safeguarding Policy (i.e., this document), KCSIE Part 1, Annex A as well as Annex B if they lead or manage or work directly with children have read and understood them.
- n) To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- o) To ensure that when children or young people leave that any child protection information is copied for the new educational provider within 5 days and transferred securely and separately from the main file.
- p) To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new child / pupil joining.
- q) To monitor the confidentiality, keeping and storage of records in relation to safeguarding.
XXXXXX hard copy records on child protection are kept locked in the Principal's office and are separated from routine pupil records. Access is restricted to the Principal, DSL, and Deputy DSLs.
- r) To ensure the Safeguarding Policy is reviewed annually in conjunction with the Principal, and the Board of Governors / Proprietor, such review to include its effectiveness in practice
- s) To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- u) To ensure the Safeguarding Policy is available to parents / carers, published on the [Hampton Court House](#) website.
- v) To ensure that "Safeguarding" is a standing item on the agenda for, and minutes of, staff meetings. This is to ensure that all members of staff will be aware that there is a safeguarding concern about that child or young person, with detailed information only shared on a 'need to know' basis. It also provides those present with an opportunity to raise any general safeguarding issues.

w) To ensure a termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board.

x) Be aware of the requirement that children investigated by the police whether the police are attending in school or interviewing the child at a police station, that an appropriate adult present. www.safeguarding.link/pace. (Annexe C, KCSIE 2025).

The deputy designated safeguarding leads – Susie Byers, Katy Deacon, Talat Khan, Janak Odedra, Imogen Stone, Emma Trimmer

The Deputy DSLs is/are trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children / young people, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

During term time, the DSL and/or the Deputy DSL s are available during normal working hours, either on site, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns.

2. Responsibilities of the STAFF

- to provide a safe and supportive learning environment
- to read and understand, Part 1 of Keeping Children Safe in Education and Annex A, as well as Annex B if the lead or manage or work directly with children.
- to read and understand the School's Safeguarding Policy and Procedures i.e. this document.
- to adhere to the Staff Code of Conduct.
- to undertake regular safeguarding training, at least annually.
- to be alert to the signs of abuse and neglect, including child-on-child abuse, and to report any concerns to the DSL immediately.
- to be aware that that even if there are no reports of child-on-child, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- to help pupils understand how to keep themselves safe and manage risk.

- to be alert to absenteeism of any children / pupils and inform the DSL of any concerns.
- to consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).
- to report to the Head/ Head Teacher / Principal Head any concerns about the conduct of adults, including low level concerns (this includes behaviour outside the nursery / school / college that might indicate an individual is unsuitable to work with children)

Responsibilities of the Principal – Katherine Vintiner

- This policy and other safeguarding related policies and procedures (such as the staff behaviour policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff receive safeguarding training that is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.
- There are enough staff per child (staff ratios), where relevant and applicable.
- The procedures for eating arrangements, food preparation and management of allergies are aligned with the EYFS statutory guidance and clearly explained in the school's supporting pupils with medical conditions policy.
- Each child in the Early Years Foundation Stage is assigned a key person.

To promote an overarching culture of safeguarding so the welfare of children is embedded within all the Hampton Court House processes and procedures operating with the best interests of the child at their heart.

- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the HCH's policy and procedures follow statutory guidance.
- To ensure that KCSIE Part 1 (including Annex A) and our Safeguarding Policy are understood and implemented effectively by all staff, whether or not they directly work with children.
- To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out

their roles effectively.

- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the Whistleblowing procedures.
- To ensure pupils are taught about keeping safe, including online
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns.
- to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To undertake training on safer recruitment processes at regular intervals
- To monitor the effectiveness of this policy and its procedures in liaison with the Safeguarding Governor and SLT and to remedy any deficiencies immediately.

3. Responsibilities of the Board of Governors and Proprietor

To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.

To ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

To create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

To ensure policies, procedures and training in the schools are effective and comply with the law at all times.

To ensure there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters.

To ensure the nominated governor has the required knowledge, skills and expertise to take leadership responsibility for HCH's safeguarding arrangements.

To ensure an appropriate senior member of staff, from the school team, is appointed to the role of designated safeguarding lead.

To ensure there is an effective Safeguarding Policy in place, which is consistent with KCSIE (Sept **2025**), Working Together to Safeguarding Children (2023) and the requirements of the Kingston and Richmond Safeguarding Children's Partnership (KRSCP).

To ensure the policy is available publicly on the schools website.

To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.

To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Anti-bullying Policy, Relationships & Sex Education Policy.

To ensure that each Dukes organisation has a written behaviour policy and that it is made available to parents through a website or on request. The behaviour policy should take into account the guidance provided below:

[Behaviour in Schools - Advice for headteachers and school staff Feb 2024](#)

To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the organisation.

To ensure that Hampton Court House holds at least two emergency contact numbers for each child.

To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in HCH's Single Central Record (SCR).

To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes.

As part of this process, the Board of Governors will ensure that the school undertakes regular monitoring of filtering systems in place and regularly reviews their effectiveness and that there is a named governor for IT for meeting its duties under the DFE Digital Standards.

The Board of Governors should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Governing Body will ensure there are policies and procedures in place regarding pupils

accessing the internet in school. The Governing Body will be doing all that it reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, the Governing Body will ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. The Governing body will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

To have policies and procedures in place relating to the use of cameras and technology within the EYFS.

A review of the Safeguarding Policy at least annually (and in the case of a serious incident), including an update and review of the effectiveness of procedures and their implementation. The annual review of safeguarding forms part of the summer term Governors' Review Meeting. A termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board by the DSL or the Head.

Governing Bodies and proprietors should ensure that **ALL** governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction. This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole **school** approach to safeguarding. Their training should be regularly updated. (KCSIE 2025).

Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to *filtering and monitoring* – see para 140 for further information) at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.

The Proprietor and the Board of Governors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their multi-agency safeguarding arrangements.

Governors of independent schools as non-public entities however do not have to follow requirement as laid down in the Public Sector Equality Duty (PSED). (KCSIE 2025)

The Online Safety Lead – Paul Pearce

To be responsible for overseeing online safety in the school with the support of the **IT manager**. The DSL will have responsibility for child protection processes (including online safety and understanding the filtering and monitoring systems and processes in place). ***This should be explicit in the role holder's job description.***

The safeguarding link governor - Rachael Friend

- They meet with the DSL and visit the school regularly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and headteacher, and make sure it is submitted to the KRSCP.
- They are the governing board's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

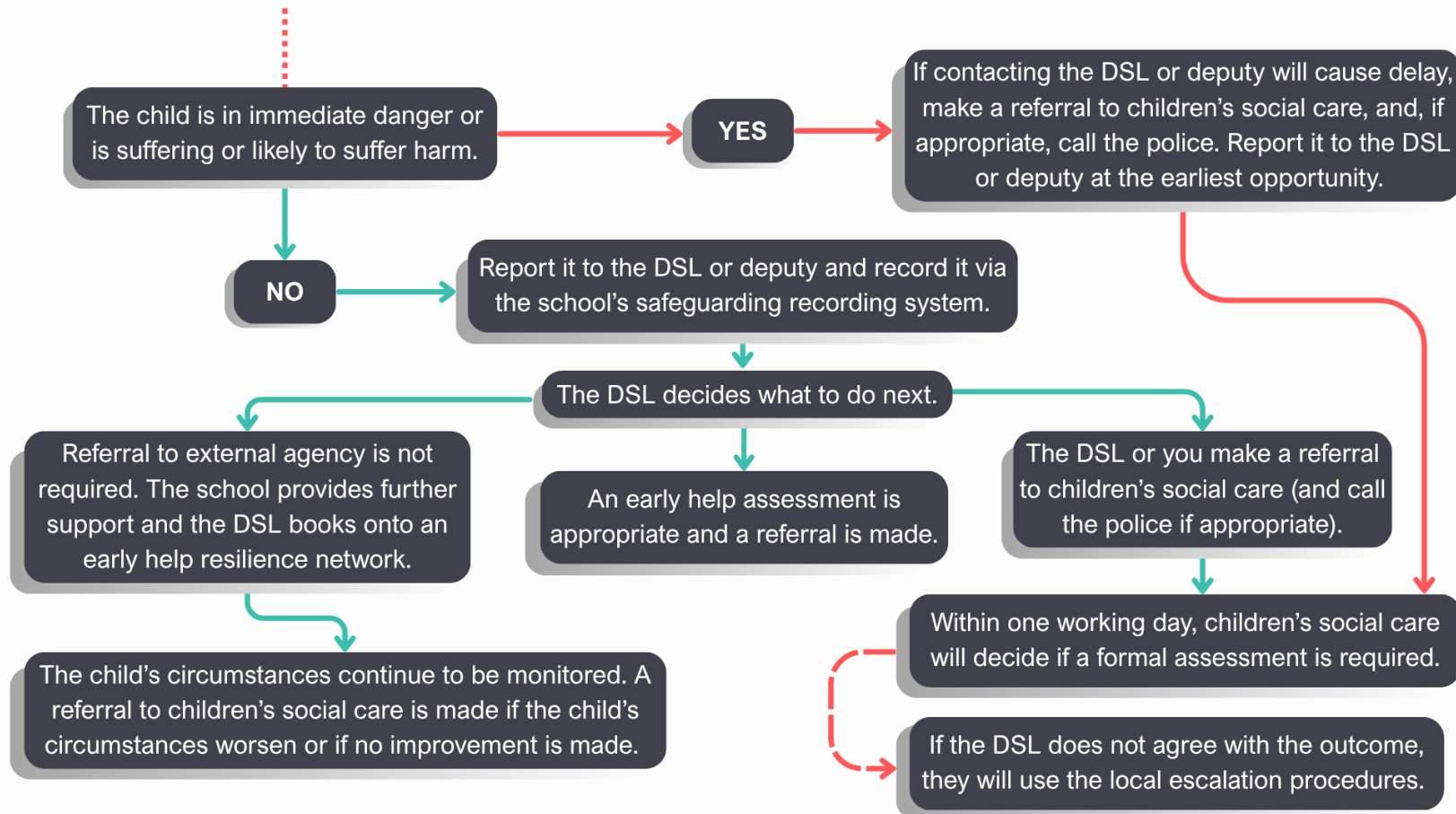
IT provider

- maintains the filtering and monitoring systems
- provides filtering and monitoring reports
- completes actions following concerns or checks to the system

7. What to do if you have concerns about a child's welfare

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

You have a concern about a child's welfare



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

Our staff can use the [What to do if you're worried a child is being abused](#) guidance with the school's procedures. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident.** The names of the DSL and deputy are clearly advertised around the school and visitors to the school are given a visitor safeguarding leaflet upon signing in.

If a child is in immediate danger, or is suffering or likely to suffer significant harm

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the referral. For children's services' contact details, [click here](#). If you make a direct referral, you will update the DSL or a deputy as soon as is practically possible.

Disclosures

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- Children may not feel ready or know how to tell someone they are being harmed.
- The child may not realise what is happening to them is harmful.
- They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than take what is being said on face value or making assumptions. We encourage staff to ask the child if they are OK or if they can help in any way. A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. At Hampton Court House School, we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

Handling a disclosure

- Listen to them carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as "Tell me", "Describe" and "Explain". Otherwise, you may

invalidate your and the child's evidence in any later court proceedings.

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

After a child has made a disclosure

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

Recording a disclosure or safeguarding concern

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

Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

The flowchart on page 18 explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary.

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or

reduces the chance of a problem getting worse. At Hampton Court House School, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family, or anonymously – discuss what is happening with the Early Help Resilience Network to ensure all identified needs are supported by the appropriate agencies. AfC's early help assessment tools and plans can be found [here](#). The partnership's [Early Help Strategy](#) sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSIE.

Referral to children's services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL and deputy are aware of the [London safeguarding children partnership's threshold document](#), which will be used to inform their response to any safeguarding concern. Whenever the DSL or deputy are unsure whether the threshold for a referral has been met, they will consult with the Single Point of Access. If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The [local resolving professional differences procedure](#) will be used, where necessary.

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

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as

‘cutting’ or female ‘circumcision’.

Teachers

For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions. All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children’s services. Staff will never examine children.

Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. will speak to the DSL or a deputy and follow local safeguarding procedures.

Concerns about nudes or semi-nudes

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately, using the school’s reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a child if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the [Searching, screening and confiscation: advice for schools](#) guidance.

The DSL will follow the government's [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

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

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children's social care
- if it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved that would influence risk assessment
- if there is a need to contact another education setting or individual
- whether to contact parents or carers of the children or young people involved – in most cases they should be involved

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

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

If none of the above applies, we can decide to respond to the incident without involving the police

or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down or support the child or parent/carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance. There is further information in the [Sharing nudes and semi-nudes](#) section of this policy.

Child-on-child abuse, including sexual violence and sexual harassment

Responding to allegations of child-on-child abuse

- Follow the 'handling a disclosure' procedure set out above. You must make a record of the allegation and inform the DSL or a deputy.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children's services.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.
3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.
4. The police will still be informed of any criminal offences. If the child is aged under the criminal age of responsibility, the police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, discussions had, decisions made and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. This support will be through PSHE, Assemblies and group interventions, Counselling may also be offered where necessary.

Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident based on the Hackett tool (diagram below). We will request the support of other agencies, such as children's services and the police, if necessary.

We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

1. Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.
2. Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the [When to call the police](#) guidance.

The Hacket Tool

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

The management of children and young people with sexually harmful behaviour is complex. Hampton Court House School will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case by case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- whether there may have been other people impacted by the behaviour
- the person known to be impacted by the behaviour, especially their protection and support
- the alleged instigator of the behaviour
- all children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or future harm
- the time and location of the incident and any action that can make the school safer

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person 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 children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against their duty to protect them and other children on a case by case basis. If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's services, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. As stated above, a police referral will still be made for children under the age of criminal responsibility.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up what staff need to know and any support that will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the [CPS: Safeguarding Children as Victims and Witnesses](#) advice.

Concerns about mental health

If you have a mental health concern about a child that is also a safeguarding concern, you will

Speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first.

Although you may be 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, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to the Child and Adolescent Mental Health Service's (CAMHS) single point of access for Kingston and Richmond [here](#).

Concerns about extremism and radicalisation

Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger or there is risk to life**, contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy in the first instance.

The DSL will respond in line with the local referral pathway. They may decide to discuss their concerns with the Council Prevent lead and/or children's services and will make referrals to the police Prevent team and/or the Channel programme where appropriate. The DSL will need to seek the individual's consent when referring to the Channel programme. The DSL will report any online material they become aware of that promotes terrorism or extremism [via the Government's online service](#).

All staff and governors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use [this](#) link.

Delete whichever is not applicable to your location.

The Prevent lead in Kingston is:

[Stephanie Royston-Mitchell](#), Community Safety and Resilience Principal

[Kingston Prevent referral pathway](#)

The Prevent lead in Richmond is:

[Naheem Bashir](#), Hate Crime and Prevent Coordinator

[Richmond and Wandsworth Prevent referral pathway](#)

See [radicalisation and extremism](#) in Appendix 1 for wider information.

How children can report concerns

In our school, it is essential that children can tell us how they are feeling and know we will take it seriously. We aim to create an environment full of 'reachable moments' which encourages children to feel safe enough to open up about their concerns. Children can confidently report any worries they have about their lives, both in and out of school, by:

- speaking to an adult they trust
- putting a written or an anonymous disclosure in a worry box/worry monster
- add in here the other ways children can report concerns, such as the role of bullying ambassadors

Comment on how you make children aware of the systems in place, such as publishing safeguarding information throughout the school, assemblies and in the curriculum.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's [voice of the child briefing](#). When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

8. Confidentiality

Hampton Court House School takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government's [information sharing advice for safeguarding practitioners](#) supports staff who have to make decisions about sharing information. Staff are aware they can look at the [data protection in schools toolkit](#) or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and Principal will only share information about a child to members of staff and professionals on a need to know basis.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them.

Notifying parents or carers

At Hampton Court House School, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children's services about how and when parents or carers should be updated. It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

9. Record keeping

Each child has a safeguarding record stored in CPOMS where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely and access will be limited to those who need it.

Where appropriate, the DSL will share information in advance of the pupil transferring so support can be put in place ready for when the pupil starts. When a child starts our school, we will make sure key staff are aware of the safeguarding file as soon as possible.

When a child leaves Hampton Court House School, the DSL will make sure that their safeguarding file is transferred to the new education setting or college within 5 days of an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from their main file and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the child transferring so support can be put in place ready for when the child starts. When a child starts our school, we will make sure key staff are aware of the safeguarding file as soon as possible.

Safeguarding file transfers are recorded in iSams - Student Manager>> Enrolment.

Incoming Safeguarding Transfers:	
Safeguarding record requested: Yes	Reason Record not Requested:
Request sent to: royalwharf@britannia.ac	Date Requested: 23 August 2022
Date form completed: Month	Return type: Select a Return type
Response sent: Month	
<input type="button" value="Update Data"/> <input type="button" value="Reload Record"/>	

Outgoing Safeguarding Transfer:	
Request received: Month	
Transfer information: Select a Transfer info	
Date Sent: Month	
Acknowledged received: Month	
<input type="button" value="Update Data"/> <input type="button" value="Reload Record"/>	

If Hampton Court House School is the last school that the child attends, their safeguarding file will be securely stored by the school until their 26th birthday is reached, when it will be securely disposed of.

10. Concerns or allegations about adults in our school

If you have a low-level concern or have an allegation to make about a member of staff (see the definition for staff in section 1 of this policy) presenting a risk to children, speak to the principal as soon as practically possible. This includes any concerns in school, out of school, online and/or offline.

If the low-level concern or allegation is about the headteacher, contact the chair of governors, whose details are at the start of this policy.

If you are unable to report to the Principal or chair of governors, either because they are not available or because you believe that there is a conflict of interest, share your concerns with the local authority designated officer (LADO), whose details are at the start of this policy.

Appendix 2 sets out what steps the Principal or chair of governors will then follow if appropriate.

Your school should have a separate procedure for dealing with allegations against members of staff and a low-level concerns policy. Add these procedures/policies in Appendix 2. These policies and procedures should also be replicated in the staff behaviour policy/code of conduct.

11. Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. Hampton Court House School has a separate whistleblowing policy, which lists the procedures for raising concerns. This is available in our School Policy Team and from the [School website](#)

Where staff feel unable to raise a concern with our senior leadership team, or feel that their

genuine safeguarding concerns are not being addressed, there are other options available to them, such as making contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk).

12. Online safety and the use of smart devices

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

Our aim is to:

- have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate
- make sure technology is used responsibly and safely through education
- set clear expectations for the use of mobile phones and smart technology

We fulfil our aims by:

- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices
- educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging with parents and carers about what online safety looks like
- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to be online safely
- making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology
- making parents, carers, children and staff aware that staff can search an electronic device they have confiscated (see [Searching, Screening and Confiscation](#))

Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

See the online safety review section in KCSIE to access a vast range of resources to support you in carrying out this review.

The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Mobile phones and smart technology (including smart watches)

Many children have unlimited and unrestricted access to the internet via mobile phone networks, therefore children could be harmed or harm others online when at school. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, we do not permit the use of mobile telephones for pupils up to year 11. All pupils who bring mobile telephones to school are required to use a Yondr pouch to prevent access in accordance with the schools mobile phone policy.

Media recordings, audio, image and video (including digital files)

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

Filtering and monitoring

To limit children's exposure to online risks from Hampton Court House School's IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will make sure that:

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue
- our governing body/board of trustees reviews the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe
- the systems are effective for the age range of children and consider children potentially at greater risk of harm
- when we block online content, it does not impact teaching and learning
- filtering works across all devices including mobile devices and smart technology

Generative Artificial Intelligence

Generative artificial intelligence (Gen AI) refers to technology that can be used to create new content (e.g. text, code and images) based on the data the models have been trained on. Our school is aware of the potential benefits of using Gen AI, such as for reducing staff's workload and freeing up teachers' time. At the same time, our school is aware of the risks and dangers associated with using Gen AI. We will use the [Department for Education's advice and guidance on using Gen AI in education](#) to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy and our AI Policy.

Remote education

When our children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- what their child/ren are being asked to do online, including the sites they will be accessing and who from the school will interact with their child/ren
- the importance of children being safe online and offering advice on how to do so
- what systems our school uses to filter and monitor online use

Information security and access systems

We have procedures in place to protect our IT systems and staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's [Cyber security standards guidance](#). Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

13. Children potentially at greater risk of harm

At Hampton Court House School, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of the groups of children this applies to, however there are several other groups not listed.

Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse, neglect and/or complex family circumstances. Hampton Court House School recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantage them educationally.

Children's services share with us which children have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to our children who have a social worker, such as:

- Nominated staff members
- Place2be support
- Offering spaces for social worker to meet with pupils

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our school works with the Virtual School to support these children.

Children looked after and previously looked after

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Staff will have the skills and knowledge to keep children looked after and previously looked after safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The designated teacher for children looked after is the DSL. The designated governor for children looked after is Rachael Friend

The statutory guidance [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the designated teacher. The

designated teacher ensures that the school has the up-to-date details of the allocated social worker and the Virtual School Principal in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

We are aware that some children are looked after by individuals other than their parents. The charity Kinship describes kinship carers as ‘family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren’t able to’. We will seek and follow the advice from the Virtual School on how to best support children and their families who are under formal or informal kinship arrangements.

Children with special educational needs, disabilities and health issues

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND.

Hampton Court House School is aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying), than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

We offer additional pastoral support for children with SEND, including;

- Onsite counselling for pupils with SEND
- One to One additional support sessions delivered by SENDCO or Assistant Principal - School Lead on Wellbeing
- Regular pupil check ins and mentoring
- Targeted support for attendance and behaviour issues
- Assemblies to celebrate and educate neurodiversity
- Confidentiality boxes for all pupils including those with SEND
- Safe space for time out

Children who are lesbian, gay, bisexual, transgender or gender questioning

We recognise that children may be targeted by other children if they are, or are perceived to be, part of the LGBT+ community. Our school strives to create and maintain a culture of inclusivity and a sense of belonging for all children. We aim to create a safe and open space where children feel comfortable speaking out and sharing their concerns. Any discrimination we become aware of is firmly addressed in line with this policy and the behaviour policy. The school will also educate the child who has discriminated, providing them with the support they need to reduce the risk of this behaviour happening again.

When children are questioning their gender, we will provide in-school support and engage external agencies for additional advice, always considering the child's individual needs. Unless it is unsafe to do so, we will work together with the child's parents and carers to ensure decisions are made with the child's input where possible, and always in their best interest.

14. Identified areas of risk for our school

Please see the school's Risky Areas Policy for information pertaining to the site and local area.

15. Lettings and off-site arrangements

When services or activities are provided by the governing body, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's [Keeping children safe during community activities, after-school clubs and tuition](#) non-statutory guidance. This includes checking that the provider has completed the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well

as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

Extended school and off-site arrangements

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

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

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

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

Although it is not possible to obtain criminality information from the DBS about adults who provide homestays abroad, we will liaise with partner schools abroad to establish a shared understanding of, and agreement to the arrangements in place for the visit. We may consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK. We will make parents aware of the agreed arrangements.

16. Training

Designated safeguarding lead

The designated safeguarding lead will attend regular training to prepare and assist them in leading

the school's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. As a minimum, the designated safeguarding lead (and deputies) will:

- attend the level 3 multi-agency local safeguarding children partnership training within 12 weeks of starting this role and refresh this every two years
- stay up to date with safeguarding knowledge, resources and changes
- have a good understanding of, and form a good relationship with, the Kingston and Richmond safeguarding children partnership by attending the termly DSL forums, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer
- attend Prevent awareness and safer recruitment training, and ensure they have a good understanding of harmful sexual behaviour
- receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff
- For early years providers, add: ensure safeguarding training attended by the DSL and provided for staff covers the criteria set out in the EYFS statutory guidance under Annex C
- make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity
- gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at Hampton Court House School

Governors

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be regularly updated. The link safeguarding governor will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance

The governing body will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. Hampton Court House School has a separate safer recruitment policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive core safeguarding and child protection training (including online safety) at induction that is minimally renewed every two years or sooner if required. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive

regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

The EYFS requires settings' safeguarding policies to include details of how safeguarding training is delivered and how practitioners are supported to put this into practice.

Staff in the Early years receive specific training relating to early years pupils. In addition to termly Safeguarding briefing from the DSL, staff are also trained in Paediatric First Aid, Positive Handling. The Head of EYFS also regularly looks at scenarios with the team to ensure staff are clear on what to do and ensure that best practice is followed.

Our training ensures that staff:

- can spot the signs of possible abuse, neglect and exploitation
- know the school's safeguarding policies and procedures and feel supported and confident to carry them out within their role
- have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral
- know what to do if a child tells them they are being harmed, including how to manage this information confidentially
- understand the reasons why children may not feel ready or know how to tell someone that they are being harmed
- receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas
- understand what cyber security the school has in place to keep children and staff safe when online at school and how to report any issues
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues
- know that children who identify as or are perceived be LGBT can be targeted by other children
- All staff responsible for children in early years have received paediatric first aid training in order to be counted within staff-children ratios

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

Specify the regularity and type of training received by staff, governors and volunteers in your school.

The Principal will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

The designated teacher for children who are looked after (CLA)

We follow the [Role and responsibilities of the designated teacher](#) statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with AfC's [Virtual School](#), accessing their training and forums to stay up to date.

17. Teaching and learning

At HCH, we aim to prevent our pupils from coming to any harm. We recognise how important it is that we teach and role-model to pupils how to keep themselves and others safe. Our curriculum meets the needs of all pupils, such as pupils with SEND and pupils who have been abused. A broad range of safeguarding topics are given specific attention through PSHE, SMSC, RSE, assemblies, and tutor time. Additionally, external speakers and groups such as 'Bold Voices' and 'Beyond Equality' are selected to deliver workshops to pupils to further enhance the curriculum.

We believe PSHE is an important and necessary part of all pupils' education. In our school, it is a key element of school life and, by teaching through form time and explicit teaching sessions which will draw on good practice and national recommendations, it will be built into many aspects of the wider curriculum. This significantly contributes to the school's Safeguarding and Equality Duties, the Government's British Values agenda and the SMSC (Spiritual, Moral, Social, Cultural) development opportunities provided for our young people. Our school believes PSHE is a shared responsibility of school staff, parents, carers, pupils and, where appropriate, the wider community.

Delivery

At Hampton Court House we teach Personal, Social, Health Education as a whole-school approach to underpin students' development as people and because we believe that this acts as both a cornerstone of the school's approach to Safeguarding and supports the pupils' learning capacity. Using a mindful approach to PSHE, Hampton Court House provides a programme which offers a comprehensive, carefully thought-through Scheme of Work bringing consistency and progression to our students' learning in this vital curriculum area. For more information, please refer to the schools PSHE policy which is available on the school website.

Areas covered may include:

- consent
- personal safety
- who to talk to
- stranger danger
- road safety
- fire safety
- online safety
- sharing of nude and semi-nude images

- bullying (including online bullying)
- positive relationships
- Child Sexual Exploitation
- Child Criminal Exploitation
- so-called 'honour based' abuse
- FGM
- radicalisation and extremism
- self-esteem
- drugs and alcohol
- knife crime.

Safeguarding is also supported through the work of the School council and mental health champions. School assemblies and awareness campaigns such as Hello yellow in support of mental health week also reinforce and raise awareness of safeguarding issues.

If specific safeguarding issues arise during the school year, the Principal will make sure the curriculum is adapted to cover current issues.

18. Linked policies

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include the below policies.

Please list all relevant policies, such as:

- Behaviour
- Physical intervention
- Anti-bullying
- Safer recruitment
- Staff behaviour policy/code of conduct
- Whistleblowing
- Procedure for managing allegations against staff (including low-level concerns)
- Health & safety
- Attendance
- Curriculum (such as PSHE and RSE)
- Supporting children with medical needs
- Online safety
- Risk assessment
- Intimate care
- Mobile phone policy (if separate)

Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSIE guidance.

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

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- communicating to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children - these may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment - it may also include neglect of, or unresponsiveness to, a child's basic emotional needs

We use the following guidance to help identify and address cases of neglect.

[Handling Cases of Affluent Neglect in Schools](#)

[Local partnership guidance](#), including the child neglect toolkit

Indicators of abuse

The following list, provided by the [NSPCC](#), covers some common indicators of abuse and neglect.

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

It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.

Specific safeguarding concerns

This section is based on Annex B of KCSIE. Annex B includes further information about other safeguarding issues to be aware of. **All concerns under this section should be addressed in line with the [section 6](#) of this document, unless stated otherwise.**

Children absent from education

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at Hampton Court House School to support us in identifying risk of harm/abuse and acting early. Our staff will be aware of our school's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. To support the school's procedure for addressing children missing or absent from education, we make sure we have more than one emergency contact number for each child. We work in partnership with AfC when patterns of absence give rise to concern, including notifying them when a child leaves our school without a new school being named.

In line with the EYFS, attendance will also be monitored for children attending our setting who are not of statutory school age. We will follow the school's safeguarding procedures if we have any concerns about prolonged absences or if a child is absent without notification from the child's parent or carer despite the school making attempts to contact them. This may include a referral to children's services and/or requesting a police welfare check.

Our attendance policy and procedures are set out in a separate document, which can be found on the school website. The school follows the government's [Working together to improve school attendance](#) statutory guidance.

Useful information:

[Local partnership guidance](#)

[Children Missing Education statutory government guidance](#)

Contextual safeguarding

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

Hampton Court House School will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with AfC's contextual safeguarding team. If there is a specific concern about a child, we will consult with children's services.

Useful information:

[Local partnership guidance](#)

Achieving for Children's Risk Outside the Home page

Tackling Child Exploitation multi-agency Practice Principles

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at

sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. 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, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development
- become pregnant

See the [Sharing nudes and semi-nudes](#) section below for details about 'sextortion'.

Hampton Court House School follows the London Child Protection Procedures regarding [sexual exploitation](#). Further information on signs of a child's involvement in sexual exploitation is available on [The Children's Society's website](#) and Home Office's [Child sexual exploitation: definition and guide for practitioners](#).

Child criminal exploitation (CCE)

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

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

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

Serious violence

Staff at Hampton Court House School will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

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

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

Useful information:

[Preventing youth violence and gang involvement government guidance](#)

[Criminal exploitation of children and vulnerable adults: county lines government guidance](#)

London Child Protection Procedures on gang activity and serious youth violence

School-related weapons incidents

Hampton Court House School follows the AfC School Related Weapons or Potential Weapons Incidents Protocol. We will inform children's services and the police of any incident involving a weapon or potential weapon. Our teachers have the legal power to search children without consent for a number of 'prohibited items', including weapons covered in the government's Searching, screening and confiscation guidance.

Hampton Court House School recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. Hampton Court House School will provide support, protection and education to develop a full

understanding of the implications of carrying, and/or using, weapons.

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

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

When necessary and in conjunction with AfC or other relevant local authority, Hampton Court House School will facilitate RHIs, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place. We will follow KRSCP's [missing children](#) procedure when required.

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. Hampton Court House School recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. Hampton Court House School aims to promote positive mental health for all staff and children. To do so, we take into account the [government's Promoting and supporting mental health and wellbeing in schools and colleges](#) guidance.

Our mental health lead is Tessa Bartholomew

Please give details of support available in your school, preventative measures, how referrals are made, positive mental health initiatives, links to mental health protocol, policy etc.

Useful information:

[Local partnership guidance](#)

[Mind](#)

[NSPCC: Child mental health](#)

Drugs and alcohol

Through our RSHE curriculum, we provide age-appropriate education on the risks and effects of drug, alcohol, tobacco and vapes. The school prioritises the safety and wellbeing of children who use, or are at risk of using, drugs or alcohol by adopting a safeguarding-first approach. We understand that drug and alcohol use can be an indicator of underlying vulnerabilities or harm. Staff are trained to recognise the signs of drug and alcohol use and its potential links to other safeguarding concerns. We will work together with external agencies, such as children's services, health professionals and the police, to ensure children receive appropriate early help and interventions. Where there is concern that a pupil is under the influence or that drugs, alcohol, tobacco or vapes are present on school premises, we will act in line with our first aid procedures, behaviour policy and, where applicable, the [When to call the police](#) guidance.

Useful information:

[Local partnership guidance](#)

Domestic abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The [Domestic Abuse Act 2021](#) states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

Hampton Court House School has signed up to the police initiative [Operation Encompass](#), a system that ensures the DSL is informed when police are called to an incident of domestic abuse and a child/children in the household experienced the incident, before the child or children arrive at school the following day. Once informed, the DSL or a deputy will provide silent support according to the child's needs and update records about their circumstances.

Useful information:

[Local partnership guidance](#)

Homelessness

Hampton Court House School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Child-on-child abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse between children in an intimate relationship
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online)
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online)
- sexual harassment, such as sexual comments, jokes and online sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

Older children may use any type of child-on-child abuse to 'recruit' younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to 'recruit' other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to be impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Hampton Court House School does not tolerate child-on-child abuse. We know that even when there are no reported cases, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For children to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways.

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.
- Add in here any other specific systems or procedures the school has in place.

Child-on-child sexual violence and sexual harassment

Our school is aware of Ofsted's [Review of sexual abuse in schools and colleges](#). The review was carried out as a result of the large amount of testimonies shared on the [Everyone's Invited](#) website, which highlighted the prevalence of sexual harassment and sexual violence.

We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exists on a continuum and may overlap. They are never acceptable and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening here at Hampton Court House School.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND
- children who are LGBT+ or who are perceived to be LGBT+ by their peers

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of

safeguarding. Hampton Court House School follows Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the [child-on-child abuse section](#) of this policy.

Harmful sexual behaviours (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. Hampton Court House School recognises that children displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputies will:

- have a good understanding of HSB
- assist in planning the curriculum aimed at preventing HSB
- ensure staff spot and report inappropriate behaviour to prevent an escalation
- incorporate our approach to sexual violence and sexual harassment into the whole school approach to safeguarding

Hampton Court House School's curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful information:

[Local partnership guidance](#)

[Centre of Expertise on child sexual abuse: Resources for education settings](#)

[NSPCC Harmful Sexual Behaviours](#)

[Stop it Now](#)

Upskirting

Hampton Court House School will ensure that all staff and children are aware that 'upskirting' is a criminal offence and will not be tolerated. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

Hampton Court House School will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 ([UKCIS, 2024](#)). Alternative terms used by children and young people may include 'dick pics' or 'pics'. It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the [alert guidance](#) and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

You may wish to cover preventative education by adding in how these topics are covered in the curriculum.

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

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

Female genital mutilation (FGM)

Female genital mutilation (FGM) means 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. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

[Section 6](#) of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM has been carried out or suspects that a child is at risk of FGM.

Signs that FGM might happen:

- a relative or someone known as a 'cutter' visiting from abroad
- a special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'
- a female relative, like a mother, sister or aunt has undergone FGM
- a family arranges a long holiday overseas or visits a family abroad during the summer holidays
- a girl has an unexpected or long absence from school
- a girl struggles to keep up in school
- a girl runs away – or plans to run away - from home ([NSPCC](#))

Signs FGM might have taken place:

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

Useful information:

[Female Genital Mutilation Statutory Guidance](#)

[Local partnership guidance](#)

[National FGM Centre](#)

Forced marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:

[Freedom charity](#)

[Handling cases of forced marriage guidance](#)

Modern slavery

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes:

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

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful information:

[Modern slavery: how to identify and support victims](#)

Private fostering

A private fostering arrangement is when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

Hampton Court House School is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

Useful information:

[Looking after someone else's child](#)

[Local partnership guidance](#)

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our [statutory duty](#) to prevent children from becoming terrorists or supporting terrorism seriously.

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

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Terrorism is an action that:

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

To prevent children from being radicalised into terrorism, we make sure:

- our filtering and monitoring systems will prevent and protect children from accessing extremist material
- children are taught about British Values and staying safe online via the curriculum
- children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views
- staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible
- the DSL attends Prevent awareness training and is aware of the latest guidance
- we perform a risk assessment assessing how our learners and staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local safeguarding children partnership

The [Educate against hate](#) government website lists signs that could indicate that a child is being radicalised:

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

If you have concerns that a child may be at risk of radicalisation or involvement in terrorism, go to [section 6](#).

Useful information:

[Local partnership guidance](#)

[Protecting children from radicalisation: the prevent duty](#)

Child abuse linked to faith or belief

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

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

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non emergency, 24/7 number: 101.

Useful information:

[Metropolitan Police advice](#)

[Short Youtube introduction video](#)

[National FGM Centre](#)

Fabricated or induced illnesses

Staff at Hampton Court House School are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting children with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful information:

[The Royal College of Paediatrics and Child Health \(RCPCH\) guidance](#)

Appendix 2 - Allegations against staff and low-level concerns procedure

Hampton Court House has a whole school approach to safeguarding, and we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Despite all efforts to recruit safely, there may be occasions when allegations of abuse against children are reported to have been committed by staff, supply staff, practitioners and/or volunteers, who work with pupils in our school.

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

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

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

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

[Guidance for safer working practice for those working with children and young people in education settings February 2022](#)

Guidance about conduct and safe practice, including safe use of mobile phones by staff, will also be given at induction. All staff are trained each term on safeguarding as part of our INSET programme. All staff are required to read HCH's behaviour policy. All school staff should take care not to place themselves in a vulnerable position with a pupil. It is always advisable for interviews or work with individual pupils or parents to be conducted in view of other adults.

We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff

receiving the allegation or being aware of the information, will immediately inform the Principal or the DSL.

On all such occasions, the Principal or the DSL will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours or as soon as possible and before taking any further action.

If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will inform the safeguarding governor who will consult the LADO as above. Contact details for the safeguarding governor can be found in [section 3](#) of this policy, on posters displayed around the school and on the visitors' leaflets.

Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families.

Hampton Court House will follow the London child protection procedures for managing allegations against staff [London child protection procedures: allegations](#) and procedures set out in Keeping Children Safe in Education 2025.

Suspension of the member of staff, against whom an allegation has been made, needs careful consideration, and the Principal will seek the advice of the LADO and the schools HR lead in making this decision. All options to avoid suspension will be considered.

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

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

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

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

There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. If a teacher is dismissed due to serious misconduct or

might have been dismissed had they not left first, consideration will be given as to whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

Low-level concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on staff's personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

The culture of our school is such that staff are encouraged to pass on low level concerns to the Principal, staff can also log this on CPOMS under the 'low level concerns' category, anything under this category is only visible to the Principal. These concerns will be recorded and dealt with appropriately. The Principal may seek advice from the LADO and will ensure that the LADO instructions are actioned. The Principal may delegate any resulting investigation to the DSL to carry out on her behalf. Ensuring they are dealt with effectively will also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Process to follow when a Low-Level Concern is raised

