ARNOLD HOUSE SCHOOL

Arnold House School

CHILD PROTECTION & SAFEGUARDING POLICY

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REVIEWED BY: DIRECTOR OF SAFEGUARDING

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1 Policy statement

1.1 The School's Child Protection and Safeguarding Policy and Procedures (**Policy**) has regard to statutory guidance *Keeping Children Safe in Education,* September 2026 and *Working Together to Safeguard Children,* March 2026, EYFS Statutory Framework 2026 the *Prevent Duty*, December 2023, *Relationships Education, Relationships and Sex Education and Health Education*, 2025, *Human Rights Act*, 1998, *Equality Act* 2010 and:

1.1.1 has been authorised by the Governing Body of Arnold House School;

1.1.2 is published on the School website and is available in hard copy to parents on request;

1.1.3 can be made available in large print or other accessible format if required; and

1.1.4 its procedures apply wherever staff, Governors or volunteers are working with pupils even where this is away from the School, for example on an educational visit.

1.1.5 Is updated annually and whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learned.

1.2 Every pupil should feel safe and protected from any form of abuse. The School is committed to safeguarding and promoting the welfare of children and expects all Governors, staff and volunteers to share this commitment. The School will take all reasonable measures to:

1.2.1 ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children in accordance with: the guidance given in *Keeping Children Safe in Education,* September 2026; the Education (Independent School Standards) (England) Regulations 2010 (as amended September 2014) and *Working Together to Safeguard Children*, March 2026 and *The Prevent Duty* (December 2023), The EYFS Statutory Framework, September 2026. See also the School's separate Recruitment, Selection and Disclosure Policy and Procedure;

1.2.2 ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. All systems and processes and policies operate with the best interests of the children at their heart;

1.2.3 ensure that all staff consider, at all times, what is in the best interests of the children;

1.2.4 ensure that when school premises are used for non-school activities the School seeks assurance from the provider that appropriate safeguarding and child protection procedures are in place (and inspect these as needed), and where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff;

1.2.5 ensure that where there is a safeguarding concern the pupil's wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback;

1.2.6 follow the local inter-agency procedures of Westminster Children's Services, part of Local Safeguarding Children Partnership for Hammersmith & Fulham, Kensington & Chelsea and Westminster;

1.2.7 be alert to signs of abuse both in the School and from outside and to protect each child from any form of abuse, whether from an adult or another child;

1.2.8 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with their agreed child protection plan;

1.2.9 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;

1.2.10 be alert to the medical needs of children with medical conditions and the vulnerability of those with special educational needs and disabilities (SEND);

1.2.11 be alert to the fact 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;

1.2.12 operate robust and sensible health and safety procedures which include guidance on drugs, alcohol and substance misuse;

1.2.13 teach pupils how to keep safe, both physically and online, for example through the curriculum and PSHE (see also PSHE Policy and ESafety Policy);

1.2.14 take all practicable steps to ensure that School premises are as secure as circumstances permit, including online, with an annual review of the effectiveness of filtering and monitoring of IT;

1.2.15 have regard to guidance issued by the Secretary of State for Education (**DfE**) in accordance with section 157 of the Education Act 2002 and associated regulations.

1.3 *Keeping Children Safe in Education* provides that the inspection of independent schools will ensure that the Independent School Standard which concerns the welfare, health and safety of children is met.

2 The Designated Safeguarding Lead and Deputy Safeguarding Leads

2.1 The School's Governing Body has appointed a member of staff of the School's senior leadership team with the necessary status and authority (**Designated Safeguarding Lead**) to be responsible for matters relating to child protection and welfare. There are seven deputy safeguarding leads.

2.2 The Designated Safeguarding Lead and Deputy DSLs are given the time, funding, training, resources and support to enable them to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.

2.3 When a parent raises a concern about the welfare of any child in the School with a member of staff, the member of staff will forward the concerns to the Designated Safeguarding Lead without delay.

2.4 The name and contact details together with the main responsibilities of the Designated Safeguarding Lead are set out in Appendix 1.

2.5 If the Designated Safeguarding Lead is unavailable, their duties will be carried out by theDeputy Designated Safeguarding Leads. The Deputy Designated Safeguarding Leads' details are also set out in Appendix 1. In this policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Leads where the Designated Safeguarding Lead is unavailable. There is a joint confidential mailbox to enable communication.

3 Duty of staff, Governors and volunteers

3.1 All staff, Governors and volunteers of the School are under a general legal duty:

3.1.1 to protect children from abuse;

3.1.2 to be aware of the terms and procedures in this Policy and to follow them;

3.1.3 to know how to access and implement the procedures in this Policy, independently if necessary;

3.1.4 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy; and

3.1.5 to report any matters of concern to the Designated Safeguarding Lead.

3.2 If staff have any concerns about a child's welfare, they must act on them immediately. Staff must speak to the Designated Safeguarding Lead (or Deputy DSL) and options will then include:

3.2.1 managing any support for the child internally via Arnold House pastoral support processes

3.2.2 a family help assessment

3.2.3 a referral for statutory services, for example as the child might be in need, or is in need or suffering or likely to suffer harm.

3.2.4 **Where a child is suffering or likely to suffer harm, a referral to Westminster Children's Services (and if appropriate the police) must be made immediately.** Anybody can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child without delay. Referrals to statutory agencies can be made without parental consent. See also the separate Arnold House School Whistleblowing Policy.

3.3 The Governing Body ensures that the School's safeguarding arrangements take into account the procedures and practice of Westminster Children's Services. The Governing Body has nominated one of its members to manage child protection incidents on behalf of the Board and to liaise with external agencies where this is required. The nominated Governor also conducts an annual review of safeguarding to include an annual review of the effectiveness of filtering and monitoring of IT systems at Arnold House in line with guidance from

Westminster Children's Services, which is reported back and considered in depth by all members of the Governing Body. The nominated Governor is Maggie Wellwood.

3.4 **Training**

3.4.1 **Induction**

(a) All staff, including Governors, temporary staff and volunteers, will be provided with induction training that includes:

(i) this Policy (which includes policy and procedures for dealing with child on child abuse);

(ii) the School's Code of Conduct, which includes staff/pupil relations, the low-level concerns policy and acceptable use of technology;

(iii) the identity and contact details of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads including those for the EYFS;

(iv) child protection training in accordance with Westminster Children's Services procedures; and

(v) a copy of Part 1 of *Keeping Children Safe in Education, September 202*6

(vi) the Whistleblowing Policy

(vii) the Pupil Behaviour Policy and the Bullying policy

(viii) the School Procedures for Registration and Missing Pupils (CME policy)

(ix) the E-Safety Policy, including procedures for filtering and monitoring of IT

3.4.2 **Child protection training**

(a) All staff will receive a copy of this policy and *Part 1* of *Keeping Children Safe in Education,* and will be required to confirm that they have read and understood these.

(b) All staff members and Governors will undertake appropriate child protection training which will include training on Prevent and online safety. This will be updated regularly as advised by Westminster Children's Services and will have regard to the Teachers' Standards which requires teachers to manage behaviour effectively and have a clear understanding of the needs of all pupils.

(c) All staff are trained to manage a report on child on child sexual violence and sexual harassment.

(d) All staff are trained to be aware of their role in the local family help process

(e) All staff are trained to be aware of the process for making referrals to children's social care

(f) All staff are trained to know what to do if a child tells them he is being abused, exploited or neglected

(g) All staff are trained to reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

3.4.3 **Designated Safeguarding Lead**

(a) The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals plus informal updates. For further details about the training of the Designated Safeguarding Lead, see Appendix 1.

3.4.4 All training is carried out in accordance with Westminster Children's Services procedures.

3.4.5 Pupils are taught about keeping safe, including online through the PSHE and IT curriculums, as well as through our approach to SMSC.

4 Procedures

4.1 Disclosure of abuse

4.1.1 Every disclosure or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy.

4.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of (Refer to Appendix 2)

4.1.3 If a member of staff is concerned that a pupil may be suffering harm, the matter should be referred to the Designated Safeguarding Lead immediately. If a member of staff suspects or hears a disclosure of abuse, the procedures set out in Appendix 3 must be followed. If at any point there is a risk of immediate serious harm a referral should be made to Westminster Children's Services or the Police immediately.

4.1.4 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, SEND, disability and/or sexual orientation or language barriers. This will not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead if they have concerns about a child. Staff must determine how best to build trusted relationships with children which facilitate communication.

4.1.5 All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Records will include:

(a) a clear and comprehensive summary of the concern;

(b) details of how the concern was followed up and resolved;

(c) a note of any action taken, decisions reached and the outcome.

(d) If in doubt about recording requirements, staff should discuss with the DSL.

4.2 **Action by the Designated Safeguarding Lead**

4.2.1 On being notified of a disclosure or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:

(a) the local inter-agency procedures of Westminster Children's Services;

(b) the nature and seriousness of the suspicion or disclosure and whether this can be met through 'family help' procedures (see 4.8). A disclosure involving a serious criminal offence will always be referred to Westminster Children's Services or the police without delay;

(c) the child's wishes or feelings, although promises of confidentiality cannot be made, and information passed on to the DSL/DDSL as per this policy without delay; and

(d) duties of confidentiality, so far as applicable.

4.2.2 If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult with Westminster Children's Services on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Westminster Children's Services will be made without delay (and in any event within 24 hours). In the unlikely event that the Designated Safeguarding Lead or the Deputy Safeguarding Leads are not available, anyone can make a referral direct to Westminster Children's Services, providing they then inform the DSL of their actions at the earliest opportunity. Anyone has the right to make a referral if they believe a child is at risk of significant harm.

4.2.3 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to the Westminster Children's Services within 24 hours. If no response or acknowledgment is received within 24 hours of the referral being made the Designated Safeguarding Lead will contact Westminster Children's Services again. If the child is at risk of significant harm an immediate response is required. This must be recorded with agreed action and reported to the safeguarding governor.

4.2.4 In circumstances where a child has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with Westminster Children's Services and where appropriate a 'family help' assessment will take place.

4.2.5 Decisions to seek support for a child in need would normally be taken in consultation with parents and children, unless there are grounds to believe that a child is at risk of significant harm.

4.2.6 The school follows the Prevent procedures if there are any concerns with regard to radicalisation. (See paragraph 4.10)

4.3 Dealing with allegations against staff, Governors, trainee teachers, contractors and volunteers

4.3.1 The School has procedures for dealing with allegations against staff, Governors trainee teachers, contractors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff, Governors, trainee teachers, contractors and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of *Keeping Children Safe in Education*.

4.3.2 The Local Authority Designated Officer (LADO) at Westminster Children's Services will be informed immediately and in any event within one working day of any allegation against staff, Governors, trainee teachers, contractors and volunteers that comes to the School's attention and appears to meet the criteria set out in paragraph 1 of Appendix 4.

4.3.3 Detailed guidance is given to staff, Governors, trainee teachers, contractors and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

4.3.4 Appendix 10 to the Staff Code of Conduct: Staff Low-Level Concerns outlines procedures for reporting low-level concerns.

4.4 Allegations against pupils of child-on-child abuse (including harassment and violence)

4.4.1 All staff are trained to be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside school and online. Staff are alert to when children might be at highest risk around the school day (for example at break time or immediately after school).

4.4.2 All staff are aware of the importance of challenging abusive behaviours between children.

4.4.3 Pupils are trained to report any concerns about abuse to their form teachers or tutors or any member of staff and can feel safe in the knowledge that their concerns will be taken seriously.

4.4.4 Staff are trained to understand that even if there are no reports of child-on-child abuse it does not mean it is not happening; it may mean it is not being reported. If any staff have concerns about child-on-child abuse they should speak to the Designated Safeguarding Lead immediately.

4.4.5 As well as knowing how to respond to concerns, all staff are trained to understand that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff know that timely, evidence-based

support can be key to preventing children from going on to commit abuse and violence.

4.4.6 A pupil against whom an allegation of abuse has been made, including online abuse and/or sexting, sexual assaults or offensive comments, including 'banter', may be suspended from the School during the investigation and the School's policy on Behaviour or Bullying will apply. Abuse is recognised as abuse, and will never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up', or 'boys will be boys' as this can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

4.4.7 Different forms that childon-child abuse can take include: bullying (including cyberbullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between peers; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (which may include an online element which threatens or encourages physical abuse); serious physical assault and harm, or the threat of harm with a weapon, sexual violence and sexual assault (which may include an online element which threatens or encourages sexual violence); sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment; causing someone to engage in sexual activity without consent; consensual and non-consensual sharing of nude and semi nude images and or videos; upskirting or initiation/hazing type violence and rituals. Staff are made aware that some groups of children are potentially more at risk of suffering sexual violence or sexual harassment, ie girls, children with SEND and LGBT are at greater risk and boys are more at risk of being perpetrators of such abuse.

4.4.8 The risk of child-on-child abuse is minimised at Arnold House through our whole-school approach to preparing pupils for life in modern Britain, delivered through the aims and ethos of the School, the Citizenship and PSHE programmes (See the separate PSHE policy and policy on SMSC).

4.4.9 In the case of a report of child-on-child abuse, staff are trained to recognise that it is essential that all victims are reassured that they are being taken seriously and they are supported and kept safe. As with other safeguarding situations, staff are trained not to promise confidentiality, keep an objective record of a conversation and report to the DSL immediately.

4.4.10 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Westminster Children's Services, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

4.4.11 Where an allegation is made against a pupil, both the alleged victim and the alleged perpetrator will be treated as being at risk and will be supported and child protection and safeguarding procedures in accordance with this Policy will be followed.

4.4.12 The threshold for dealing with an issue of pupil behaviour or bullying under this policy is subject to guidance from Westminster Children's Services as in any other case: when there is 'reasonable cause to suspect that a child is suffering, or likely to

suffer, significant harm'. Any such abuse will be referred to Westminster Children's Services.

4.5 **Child-on-child sexual violence and sexual harassment**

4.5.1 Sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally), and could take place in school or outside, and are never acceptable. All staff are aware that they should maintain an attitude of 'it could happen here'.

4.5.2 Inappropriate behaviour is addressed as soon as it is recognised.

4.5.3 Staff are made aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

4.5.4 Staff are made aware that it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed.

4.5.5 As children may not find it easy to tell staff about their abuse, if staff have any concerns about a child's welfare, they must act on them immediately by reporting to the Designated Safeguarding Lead or Deputies.

4.5.6 Staff are made aware that the School's initial response to a report from a child is extremely important and can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward;

4.5.7 Staff are trained to manage a report of sexual violence or sexual harassment in the following way:

- if possible, reports should be managed with two members of staff present;
- where the report includes an online element staff are aware that they should not view or forward illegal images of children. In some cases it would be appropriate to confiscate the device to hand to the Police;
- staff are aware that they must not promise confidentiality and should explain the next steps to the victim to avoid misunderstanding;
- staff recognise that a child is likely to disclose to someone they trust and this could be anyone on the staff. The person concerned should be supportive and respectful of the child;
- staff are aware that if an incident is reported there may be more to it and that children who have suffered trauma may not be able to recall all details or timeline of abuse;
- staff are aware that some children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;

- staff are aware that they should listen carefully to the child, reflect back, using the child's language, be non-judgemental, be clear about boundaries and how the report will be progressed, not ask leading questions and only prompt where necessary with open questions;

- staff are aware that it is best practice to wait until the end of a report and immediately write up a thorough summary. It is possible to take notes during a report, providing full attention is paid to the child. It is essential a written record is made;

- staff are aware that such notes are factual only and should not include their opinion. Staff know that such notes could become part of a statutory assessment by social care or part of a criminal investigation;

- staff are aware that they must inform the Designated Safeguarding Lead immediately of such a report.

4.5.8 When there has been a report of sexual violence, the Designated Safeguarding Lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment will consider:

- the victim, especially their protection and support;

- whether there may have been other victims;

- the alleged perpetrator(s); and

- all the other children (and if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

4.5.9 When managing the report, there are four likely scenarios for the School to consider, and the decisions and actions will be regularly reviewed. The four scenarios are:

- manage internally

- Family help

- referral to children's social care

- report to the Police.

4.5.10 If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the child and/or 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.

4.5.11 The following principles will help shape any decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim are paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible the victim, if they wish, should be able to continue in their normal routine.

- Consider the age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School is aware that by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.

- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

- The proportionality of the response will be considered and support will be tailored on a case-by-case basis.

- The School is aware that sexual assault can result in a range of health needs, including physical, mental and sexual health problems and unwanted pregnancy. There is a range of support available.

4.6 Children with SEND

4.6.1 Staff are made aware that additional barriers can exist when recognising abuse and neglect in children with SEND. These can include:

(a) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

(b) These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children

(c) The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

(d) Communication barriers and difficulties in managing or reporting these challenges.

4.7 Mental Health

4.7.1 Staff are made aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

4.7.2 Although only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are 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. If a child is struggling with

their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which staff are well placed to recognise. These could include:

(a) Significant changes in behaviour

(b) Ongoing difficulty sleeping

(c) withdrawing from social situations

(d) not wanting to do things they usually like, and

(e) physical signs of self-harm or neglecting themselves.

4.7.3 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and talking to the DSL, Deputy DSL and Director of Wellbeing (see also the Arnold House Mental Health Policy). If staff feel that a child is in danger they should call 999. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

4.8 **Community-based Early help assessment**

4.8.1 Staff hold frequent pastoral meetings where the welfare of individual pupils is discussed, and in particular any changes in their behaviour or circumstances. These include weekly supervision meetings in the Pre-Prep. Staff are trained to observe and listen to children and identify early signs of neglect or abuse and to report any concerns to the Designated Safeguarding Lead who liaises with Westminster Children's Services without delay.

4.8.2 Where appropriate, a 'family help' assessment will be convened in accordance with their procedures.

4.9 **Absent or Missing child procedures**

4.9.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any child missing or absent from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the child for being missing.

4.9.2 The School will inform Westminster Children's Services of any pupil who fails to attend School regularly or has been absent without the School's permission for a continuous period of 10 school days or more. The School will also inform Westminster Children's Services within five days when a child's name is removed or added to the admission register, other than where children are entering Pre-Reception in September or leaving at the end of Year 8.

Please see the School's separate Registration and Missing Pupil Procedure for further details.

4.10 Preventing radicalisation procedures

4.10.1 As with managing other safeguarding risks, staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection from being drawn into terrorism.

4.10.2 If a member of staff has a concern about a particular child they should follow the school's normal safeguarding procedures, including discussing with the Designated Safeguarding Lead, and where deemed necessary, with the Prevent Officer from Westminster Children's Services.

4.11 Online safety and use of mobile phones and cameras

4.11.1 Online safety is covered in detail in our separate e-safety policy.

4.11.2 The School ensures that online safety is an interrelated theme whilst devising and implementing policies and procedures and is considered whilst planning the curriculum, any teacher training, the role and responsibilities of the Designated Safeguarding Lead and any parental engagement.

When an incident involving youth-produced sexual imagery (or that generated by AI) comes to our attention:

- the incident must be referred to the DSL without delay
- the DSL will hold an initial review meeting with appropriate school staff
- there will be subsequent interviews with the pupil(s) involved (if appropriate)
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- at any point in the process if there is concern a pupil has been harmed or is at risk of harm a referral will be made to Westminster Children's Services and/or the police immediately
- appropriate support will be given to the pupil.

Please refer to the school's separate policy on e-safety.

4.11.3 Pupils do not have access to their mobile phones during the school day; they hand them in at the beginning of the day and collect them when leaving at the end of the day.

4.11.4 In Pre-Prep (including EYFS) mobile phones must not be used in areas used by the children. Staff are permitted to keep their phones switched on in case of urgent calls, but they will be kept in the staff cloakroom on the ground floor, which is a locked room away from the children. Staff are permitted to use their phones in the staff room located on the first floor but must not have their phone out when transporting it from the cloakroom to the staff room.

4.11.5 Under no circumstances does the school allow a member of staff working in the Pre-Prep (including EYFS) to contact a parent/carer using their personal device. Users bringing personal devices into school must ensure there is no inappropriate or illegal

content on the device. Staff are permitted to use their mobile phones during their lunch breaks away from the children.

4.11.6 The use of Apple watches/smart watches etc, is only permitted if they are unable to take or share images. Any external electronic device with imaging and sharing capabilities is not permitted in School. The exception with this is during school performances, where parents are able to take photographs of their children. Parents are asked not to share images of any other child on social networks. Failure to comply will result in this permission being removed.

4.11.7 Staff in the Pre-Prep (including EYFS) may only use personal devices on staff breaks or in the staff member's own time and then only in the designated (child free) staff area.

4.11.8 It is the responsibility of all members of staff to be vigilant and to report any concerns to the Head of Pre-Prep. (See Whistleblowing policy)

4.11.9 All urgent calls are to be taken from the main line, however if any staff member has a family emergency or similar, prior permission must be sought from the Head of Pre-Prep to keep their device in an agreed area.

4.11.10 During group outings a nominated staff member will take the allocated School mobile phone out with them in case of emergency. This should only be used for emergency calls and incoming calls, under no circumstances must a member of staff take a personal call whilst caring for children. It is the responsibility of all staff members to be vigilant and report any concerns to the Head of Pre-Prep.

4.11.11 The use of mobile phones and devices by parents and visitors is forbidden within the Pre-Prep (including EYFS). Signage clearly states this is the school policy.

4.11.12 Parents or visitors who either arrive using a mobile phone or take a call on a mobile should be immediately told to end their phone call or leave the premises. Visitors are signed into the Pre-Prep and asked to leave their personal belongings and mobile phones in a safe area.

4.11.13 Photographs taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements is an effective form or recording their progression in the Early Years Foundation Stage. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care. Photographs taken in School are deleted from devices once shared with parents.

4.11.14 Only school devices are to be used to take or share any photograph within the setting or on outings.

4.11.15 Images taken on this camera must be deemed suitable without putting the child/children in any compromising positions that could cause embarrassment or distress.

4.11.16 All staff are responsible for the location of photographic devices; which should be placed in the resource room when not in use.

4.11.17 Images taken and stored on the camera must be downloaded as soon as possible, at least once a week.

Parental permission with regard to the use of images is obtained from the parent/carer on joining the Pre-Prep.

4.12

Domestic abuse, gangs, child sexual exploitation, child criminal exploitation, honour-based violence

4.12.1 If it comes to our attention that a child is at risk of being caught up in domestic abuse, gangs, child sexual exploitation, child criminal exploitation or honour-based violence:

- The matter will be referred to the DSL immediately and in the absence of the DSL or Deputy DSLs to Westminster Children's Services or the police
- appropriate support will be given to the child following advice from Westminster Children's Services.
- In the case of CSE or CCE, this may include children who have been moved for the purpose of exploitation. This may constitute modern slavery. In such cases a relevant child protection and modern slavery referral will be completed where a potential victim of CCE or CSE is identified.

4.13 **Informing parents**

4.9.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Headmaster, the local authority designated officer, Westminster Children's Services and / or the police before discussing details with parents (see note 4.2.5).

4.9.2 See also section 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Headmaster of the School.

5 Secure school premises

5.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

5.2 The School has an electronic sign-in protocol at Reception at all three sites. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. They also receive details with regard to the names of the DSL and DDSLs and what to do if they have a concern with regard to safeguarding. Health and Safety information including how to respond to the fire alarm is also given.

5.3 Security at Canons Park:

5.3.1 The Canons Park Activity Centre has a single point of entry which is controlled by a magnetised security gate.

5.3.2 A member of staff is on duty at the entrance to the grounds to provide security, welcome visitors and supervise contractors.

5.3.3 The pupils are supervised by members of the teaching staff whilst at Canons Park, as they would be at the main school site.

5.3.4 Contractors are accompanied at all times when inspecting facilities/equipment around the site.

5.3.5 Contractors at work, whilst pupils are on site, carry out their tasks in clearly demarcated areas under the supervision of the grounds staff.

5.4 Online security:

5.4.1 Governors ensure that the School has appropriate filters and monitoring systems in place and regularly review their effectiveness.

Please see also our separate policy on E-Safety.

6 Use of school premises for non-school activities

6.1 Where the School rents out the premises to organisations or individuals, we ensure that appropriate arrangements are in place to keep children safe.

6.2 Where services or activities are provided separately by another body the School will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place.

7 Confidentiality and information sharing

Staff will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children. When deciding what information to share, the DSL considers:

- the relevancy of the information, including to the current safeguarding risk
- what is necessary for the receiving setting to know
- whether it is clearly presented and appropriately contextualised

The School will co-operate with police and Westminster Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children* (2026).

When a pupil moves to another school, the DSL is responsible for ensuring that any child protection records are passed on and discussed with the receiving DSL. A record is kept of

the information passed on and details of the handover including name of the receiving DSL and date.

Data protection laws do not prevent the sharing of information for the purposes of keeping children safe.

7.1 Where allegations have been made against staff, the School will consult with the local authority designated officer and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

8 Monitoring and review

8.1 The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as appropriate. Any child protection incidents at the School will be followed by a review of these procedures by the Designated Safeguarding Lead and the result of the review reported to the nominated Governor for Safeguarding and Child Protection. Where an incident involves a member of staff, the local authority designated officer will assist in this review to determine whether any improvements can be made to the School's procedures.

8.2 In addition, the full Governing Body will ensure that the Designated Safeguarding Lead will undertake a review of this Policy annually. The outcome of the annual review by the Designated Safeguarding Lead will be reported to the full Governing Body who will review this Policy and the implementation of its procedures, including good cooperation with local agencies, and consider the proposed amendments to the Policy, from both the Designated Safeguarding Lead and its own members, before giving the revised Policy its final approval. Minutes recording the review by the Governing Body will be made.

9 Contacts – External Agencies

9.1 The details of the Local Authority Designated Officer (LADO) are as follows:

Duty Child Protection Adviser/LADO	020 7641 7668
Email: lado@westminster.gov.uk	

9.2 The telephone numbers of the Westminster Children's Services department are as follows:

Children's Services Team (to make a referral)	**020 7641 4000**
Email: safeguarding@westminster.gov.uk	
Children's Services Team (General Enquiries)	020 7641 6000
Children's Services Team out of hours line	020 7641 6000
Nominated governor for Safeguarding and Child Protection (Maggie Wellwood)	020 72664840
Prevent Programme Manager (Kiran Malik) Email: prevent@westminster.gov.uk	07817054699/07790 980223

DfE dedicated telephone helpline counter extremism 020 7340 7264
www.counter-extremism@education.gsi.gov.uk

NSPCC Whistleblowing helpline 0800 028 0285

9.3 The following telephone numbers may be useful for pupils:

Childline 0800 1111

NSPCC 0808 800 5000

Appendix 1 The Designated Safeguarding Lead

1 The Designated Safeguarding Lead for the School site is Elena Gregoriou Ostojic, Head of Learning Support, who may be contacted on 020 7266 4840.

2 The Deputy Designated Safeguarding Leads are

(a) Dayne Matthews, extension 206

(b) Jon Harahap, extension 150

(c) Keeley Miller, extension 208

(d) Emma Raffety, extension 303

(e) Donna El Jacifi, 020 4553 0905

(f) Josh Wint, extension 203

(g) Nicola Kasin-Lewis, extension 481

3 In accordance with Annex B of *Keeping Children Safe in Education, September 2026,* the main responsibilities of the Designated Safeguarding Lead are:

3.1 **Manage referrals**

The Designated Safeguarding Lead will refer cases:

(a) of suspected abuse and neglect to the Westminster Children's Services as required and support staff who make referrals to local authority children's social care;

(b) to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;

(c) where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and

(d) where a crime may have been committed to the Police as required.

3.2 **Working with others**

The Designated Safeguarding Leads are expected to:

(a) act as a source of support, advice and expertise for all staff;

(b) act as a point of contact with the safeguarding partners;

(c) liaise with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should

include being aware of the requirement for children to have an Appropriate Adult;

(d) as required, liaise with the 'case manager' and the designated officer at Westminster Children's Services (LADO) for child protection concerns in cases which concern a staff member;

(e) liaise with staff (especially teachers, pastoral support staff, School Nurse, Head of IT, Director of Wellbeing and Head of Learning Support) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that pupils' needs are considered holistically;

(f) liaise with the Director of Wellbeing where safeguarding concerns are linked to mental health;

(g) promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

(h) work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School. This includes:

(A) ensuring that the school knows which of its cohort of children has, or has had, a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for them; and,

(B) supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

(i) Act as a source of support, advice and expertise for staff.

3.3 **Training, knowledge and skills**

The Designated Safeguarding Lead (and deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The Designated Safeguarding Lead will undertake Prevent awareness training.

Training will provide the Designated Safeguarding Lead and Deputies with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children

at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

(a) Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

(b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

(c) Understand the role the Designated Safeguarding Lead has in providing information and support to children's social care in order to safeguard and promote the welfare of children;

(d) Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;

(e) Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;

(f) Understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners.

(g) Understand and support the School with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

(h) Are able to understand the unique risks associated with online safety and be confident that, with the support of other senior members of staff, such as the Head of IT, they have access to relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school;

(i) Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

(j) Obtain access to resources and attend any relevant or refresher training courses; and

(k) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

3.4 **Providing support to staff**

Training will support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals processes; and
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

3.5 **Understanding the views of children**

It is important that children feel heard and understood. Therefore, Designated Safeguarding Leads will be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

3.6 **Raising awareness**

The Designated Safeguarding Lead will:

(a) Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;

(b) Ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;

(c) Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and

(d) Link with local Westminster Children's Services to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements; and

(e) Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

3.7 **Information sharing and managing the child protection file**

(a) The Designated Safeguarding Lead is responsible for ensuring that child protection files are kept up to date.

Information will be kept confidential and stored with concerns and referrals in a separate child protection file for each child.

Records include:

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

They ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice set out in Part one and Part two of KCSIE.

Appropriate arrangements are in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves.

(b) Where children leave the School the Designated Safeguarding Lead ensures their child protection file is transferred to the new school as soon as possible, and within five days for an in-year transfer or within the first five days of a new term. This is transferred separately from the main pupil file ensuring secure transit and obtaining confirmation of receipt from the new school or college. Transferred files include a clear, structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs.Particular care will be taken to distinguish between current safeguarding concerns and historic information, ensuring that past issues are presented with appropriate context. When receiving files for incoming pupils, key staff such as DSL, Head of Learning Support and Heads of Year are aware as required in order that key risks and needs are clearly understood.Where the school receives information that is unclear or incomplete, the DSL will seek clarification where necessary to support effective safeguarding.

(c) Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the Designated Safeguarding Lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

3.8 **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Part one, two and five of KCSIE, and therefore the Designated Safeguarding Lead is equipped to:

- Understand the importance of information sharing, both within the School, and with other schools on transfer including in-year and between primary and secondary education and with the safeguarding partners, other agencies, organisations and practitioners;

- Understand relevant data protection laws; and

- Be able to keep detailed accurate, secure written records of all concerns discussions and decisions made including the rationale for those decisions. This will include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

3.9 **Availability**

During term time the Designated Safeguarding Lead (or one of the deputies) is always available (during school hours) for staff in the school to discuss any safeguarding concerns. It is the responsibility of the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities**.**

To ensure continuity of safeguarding responsibilities, there are cover arrangements for periods when the DSL is unavailable. There is a confidential shared mailbox to ensure that safeguarding concerns are received, monitored and acted upon without delay.

Appendix 2: Types and Signs of Abuse

1 Types of abuse (from *Keeping Children Safe in Education*, September 2026

1.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

1.4 **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. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

1.5 **Neglect:** 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2 Specific Safeguarding Issues

All staff are trained to have an awareness of safeguarding issues that can put children at risk of harm and have an awareness that safeguarding issues often overlap. Staff are aware that behaviours linked to the likes of drug taking, alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and or videos can put children in danger. Annex A of *Keeping Children Safe in Education* contains details on specific safeguarding issues and all staff are obliged to confirm that they have read and understood the document.

Specific safeguarding issues included in Annex A of KCSIE, which staff are made aware of, are:

2.1 Child abduction and community safety incidents

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

2.3 County lines

2.4 Children and the court system

2.5 Children missing from education (CME)

2.6 Children with family members in prison

2.7 Cybercrime

2.8 Domestic Abuse

2.9 Homelessness

2.10 Modern slavery and the National Referral Mechanism

2.11 Preventing Radicalisation

2.12 The Prevent Duty

2.13 Channel

2.14 Serious violence

2.15 Honour'-based abuse (including FGM and forced marriage)

2.16 FGM

2.17 FGM mandatory reporting duty for teachers

2.18 Forced marriage

2.19 Additional support

3 Signs of abuse

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the pupil says he has been abused or asks a question or makes a comment which gives rise to that inference

3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries

3.1.3 the pupil's play or behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour or a pupil is unusually sexually aware for their age

3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons

3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing

3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed

3.1.7 the pupil is reluctant to go home, or has been openly rejected by his parents or carers and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Westminster Children's Services can provide advice on the signs of abuse and the NSPCC website is also a good source of information and advice.

Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse

1 Action staff must take

1.1 A member of staff or volunteer suspecting or hearing a complaint of abuse:

1.1.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;

1.1.2 must not ask leading questions, i.e. a question which suggests its own answer;

1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken; the information should be logged on CPOMS; and

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

1.1.5 must keep a sufficient written record of the conversation. The record should include:

(a) a clear and comprehensive summary of the concern;

(b) details of how the concern was followed up and resolved

(c) presence note of any action taken, decisions reached and the outcome.

1.2 The record should be signed and dated with the time and place of the disclosure by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead or logged on CPOMS immediately.

1.3 All evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to the Designated Safeguarding Lead.

1.4 All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead immediately, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 4 should be followed. **If there is a risk of immediate serious harm to a child and it is not possible to report to the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads, a referral should be made to Westminster Children's Services immediately**.

Appendix 4 Dealing with allegations against members of staff, the Headmaster, Governors, trainee teachers, contractors or volunteers

1 The School's procedures

1.1 The School's procedures for dealing with allegations made against staff will be used where the member of staff, the Headmaster, governor, trainee teacher, contractor or volunteer has:

1.1.1 behaved in a way that has harmed a pupil, or may have harmed a pupil;

1.1.2 possibly committed a criminal offence against or related to a child; or

1.1.3 behaved towards a pupil or pupils in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.

1.2 Any allegations not meeting this criteria will be dealt with in accordance with Appendix 10 to the Staff Code of Conduct: Staff Lower-Level Concerns. Advice from the local authority designated officer will be sought in borderline cases.

1.3 All such allegations must be dealt with as a priority.

2 Initial response to an allegation

Where a child has been harmed, or there may be immediate risk of harm to a child or the situation is an emergency, the DSL or deputy DSL should contact Westminster Children's Services or the police immediately.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child – the DSL is responsible for ensuring the child is not at risk and referring cases of suspected abuse to Westminster Children's Services

- Investigating and supporting the person subject to the allegation – the case manager should discuss with the LADO the nature, content and context of the allegation and agree a course of action.

3 Reporting an allegation against a member of staff, the Headmaster, Governor, contractor or volunteer

3.1 Where an allegation or complaint is made against any member of staff, Governor or volunteer, the matter must be reported immediately to the Headmaster or in his/her absence to the Chair of Governors. Where appropriate, the Headmaster will consult with the Designated Safeguarding Lead and the allegation will be discussed immediately with the local authority designated officer before further action is taken.

3.2 Where an allegation or complaint is made against the Headmaster, the matter must be reported immediately to the Chair of Governors, without first notifying the Headmaster. Again, the allegation will be discussed immediately with the local

authority designated officer before further action is taken. Where there is a conflict of interest in reporting the matter to the Headmaster, the report must go directly to the LADO.

3.3 If it is not possible to report to the Headmaster or Chair of Governors in the circumstances set out above in 2.1, a report must be made immediately to the Designated Safeguarding Lead or, if he/she is unavailable, a Deputy Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Headmaster or, where appropriate, the Chair of Governors.

3.4 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

4 Disclosure of information

4.1 The case manager will inform the accused person of the allegation as soon as possible after the local authority designated officer has been consulted.

4.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.

4.3 Where the local authority designated officer advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

4.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

5 Further action to be taken by the School

5.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part four of *Keeping Children Safe in Education*, September 2026 and the School's employment procedures.

6 Timescales

5.1 All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Headmaster should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

7 On conclusion of a case

7.1 If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Arnold House has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

7.1.1 The harm test is satisfied in respect of that individual

7.1.2 The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and

7.1.3 The individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

7.1.4 The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended.

7.1.5 If the individual is a teacher, the matter will also be referred to the Teaching Regulation Agency.

7.1.6 If the allegation relates to a member of supply staff provided by an agency, or a trainee teacher the agency or other employer will be fully involved

7.2 Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

8 Unsubstantiated, false or malicious allegations

8.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's Behaviour and discipline policy.

8.2 Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

8.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

9 Record keeping

9.1 Details of allegations found to be malicious will be removed from personnel records.

9.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual

has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

9.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.

10 Low level concerns

10.1 For concerns which do not meet the harms test above, Appendix 10 to the Staff Code of Conduct: Staff Low-Level Concerns outlines procedures for reporting low-level concerns.

10.2 Examples of low-level concerns might include being overly friendly with particular children, taking photos of children on a mobile phone, having favourites, using inappropriate language, etc.

10.3 The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour as outlined in the Staff Code of Conduct are constantly lived, monitored and reinforced by staff.

10.4 Reports about supply staff, trainee teachers and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.