SAFEGUARDING POLICY

(for the whole School including the EYFS)

Contents

1. Introduction
2. Aims
3. Procedures
   a) Receiving a disclosure
   b) Concerns about a child
4. Safeguarding Practices
5. Dealing with allegations of abuse against staff
6. Unfounded Allegations
7. Allegations of abuse by one or more pupil against another pupil (child on child)
8. Training
9. Safer Recruitment
10. Confidentiality
11. Whistleblowing
12. Managing Safeguarding
    Responsibilities
    Supporting children
    Equalities and bullying
    Health & Safety
13. Physical intervention
14. Prevention
15. Monitoring and evaluation
16. Review
17. Job description

Appendix 1 Contacts
Appendix 2 Type of abuse and neglect
Appendix 3 Garden House School Restraint Policy
Appendix 4 Working with children one-to-one
Appendix 5 Job description for the DSL & Deputy DSL's
Appendix 6 COVID-19 addendum – response when school is closed
Appendix 7 COVID-19 addendum – response when school is open

SAFEGUARDING POLICY

(for the whole school including the EYFS)

This policy is written with due regard to the following:

Keeping Children Safe in Education (KCSIE) (September 2020)

- Including: Disqualification under the Childcare Act 2006 (September 2018), What to do if you're worried a child is being abused (March 2015) and When to call the police

Working Together to Safeguard Children (September 2018 – updated in 2019 but without changing the date on the published version)

Independent Schools Standards (March 2018)

ISI Handbook – Commentary on the Regulatory Requirements (September 2020)

The Prevent Duty: Departmental Advice for schools and childcare providers (June 2015)

Prevent Duty Guidance: for England and Wales (July 2015)

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

Sexting in schools and colleges: responding to incidents and safeguarding young people', UKCCIS (January 2017)

Sexual Violence and Sexual Harassment between children (May 2018)

Child sexual exploitation (February 2017)

Children missing education (September 2016)

Tri Borough Local Safeguarding Children Board Policy and Procedures

See also: *Anti-bullying Policy, Behaviour Policy, Learning Support Policy, Life and Culture (PSHE) Scheme of Work, Relationships Policy, Recruitment Policy, Induction Policy, Prevent Policy, Privacy Notice, Whistleblowing Policy, Policy on Pupils' use of ICT, and other Electronic Devices -for the whole school, including EYFS (Online Safety) and the Staff Code of Conduct including Email and Internet/Social Media Guidance.*

This policy is available on the School website, in the parent handbook and is also available to parents from the School office on request. All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding procedures through the availability of the Safeguarding Policy via these channels.

Please Note – As a school, we are aware that the 'LSCB' has changed to the 'LSCP' however in Kensington and Chelsea, they still refer to the 'LSCB' so we use that terminology throughout this policy. We will continue to monitor these changes and update this policy accordingly.

GENERAL STATEMENT

We 'The School' are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

We recognise that safeguarding is the responsibility of everyone at Garden House School and that anyone can make a direct referral if they feel their concerns are not being addressed by the School. For pupils in Kensington and Chelsea, concerns about a child should be referred to the **Local Safeguarding Children Board Duty Line** – Tel: 020 7361 3013 (Out of hours – 020 7361 3013) and allegations about a teacher or other adult should be made to the local authority designated officer (**LADO**) - Tel: 020 7361 3013. See also Appendix 1. Referral processes are also available when there are concerns about children who may be at risk of being drawn into terrorism.

1. INTRODUCTION

The Proprietor and Co-Principals, Heads and Staff take seriously their responsibility to safeguard and promote the welfare of children and to work together with other agencies to ensure there are appropriate and effective arrangements within the School to identify, assess, and support those children where there are concerns about a child's safety and welfare.

We recognise that all members of staff have a full and active part to play in protecting pupils from harm, and that the child's welfare is our paramount concern. Wherever the word "staff" is used, it covers **ALL** staff on site, including support staff and volunteers working with children. Any member of staff can make a referral about a child or a member of staff if necessary.

The School is committed to providing a caring, positive, vigilant, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

2. AIMS

The aims of this policy are:

- To support each child's development in ways that will foster awareness, understanding, security, confidence, resilience and independence.
- To provide an environment in which all children feel safe, secure, valued and respected, and, if they are experiencing difficulties, also feel confident to approach adults in the knowledge that they will be listened to and believed.
- To ensure that all staff and children receive appropriate education in safeguarding.
- To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases, or suspected cases, of abuse.
- To provide a systematic means of monitoring and supporting children known or thought to be at risk of harm, and ensure we, the School, support those children.
- To emphasise the need for good levels of communication and record keeping between all members of staff.
- To develop a structured procedure within the School, to be followed by all members of the School community in cases of alleged or suspected neglect, abuse and/or any other child welfare concern.

- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To ensure that all adults within the School who have access to children have had an enhanced Disclosure and Barring Service (**DBS**) check in accordance with the safeguarding requirements in this policy and as required by law. Every member of staff is required annually to sign a staff suitability declaration form. Should any deficiencies or weaknesses in the safeguarding arrangements become apparent, the arrangements will be remedied without delay.

3. CONCERNS ABOUT A CHILD

The School's Designated Safeguarding Lead (**DSL**) is *Kate O'Sullivan*, Assistant Head (Pastoral).

She is assisted by four Deputy Designated Safeguarding Leads:

Julia Adlard – (Head of EYFS); Deputy DSL with responsibility for EYFS

Natalie Richmond Elvy – (Boys' School MSII Class Teacher); Deputy DSL

Claire Noble – (Head of Kindegarden); Deputy DSL at Turk's Row and DSL for Sedding Street site

Charlotte Byfield – (Boys' School MSI Class Teacher); Deputy DSL at Turk's Row and DSL for 49 Holbein Mews

There is also a trained school counsellor/psychotherapist: *Annabelle Meyer Ahouiyek.*

The names of the members of the Designated Safeguarding Team are clearly advertised throughout the School. In the event that the DSL is unavailable, any of the Deputy DSL's should be contacted instead.

3a. PROCEDURE – RECEIVING A CONCERN ABOUT A CHILD

If a child makes a disclosure of abuse of any kind to a member of staff, he or she must be listened to and the member of staff must:

- allow the child to make the disclosure at their own pace;
- avoid interrupting except to clarify what the child is saying;
- not ask leading questions or probe for information;
- reassure the child that they have been heard and explain what you will do next and to whom you will talk;
- not promise confidentiality;
- not attempt to investigate any allegation themselves;
- make and keep accurate written records (preferably in pen); and report the matter to the DSL, or one of the Deputy DSLs immediately;
- be aware of the need to refer matters to Social Care themselves if they feel the matter is not being suitably escalated;

Every attempt will be made to offer support for the child whilst at school and the school will provide an environment in which he/she can spend the school day in complete confidence and safety.

3b. PROCEDURE – CONCERNS ABOUT A CHILD

Whenever any member of staff has a serious concern about a child or a reason to suspect that a pupil may have suffered abuse, the DSL, the relevant Head or one of the Deputy DSLs MUST be informed *in writing* at once (within 24 hours). Concerns formed should be delivered by hand, in person to the DSL's office (or, in his absence, to the relevant Head or a Deputy DSL). Concerns forms are highly confidential and should not be left out on desks. In the unlikely event that the DSL, the relevant Head and the Deputy DSLs can't be located, an email should be sent to the DSL requesting an urgent conversation.

See Appendix 2 for definitions and symptoms of abuse, including Child Sexual Exploitation (**CSE**), Criminal Child Exploitation (**CCE**), Domestic Abuse, Honour Based Abuse (including **FGM**), Peer on Peer / Child on Child and Radicalisation. Should it be suspected that a member of staff or other adult has committed the abuse then the procedures from Section 5 must be followed. Should it be felt that that any concerns are not being addressed, for example, that a child is not receiving the support necessary or that the child's wellbeing is deteriorating, then the relevant Head must be informed or if necessary, the local authority contacted (see section 1 for details). All staff are aware that they are entitled to make a referral to Social Services at any time.

Signs and Symptoms of Abuse can be found in Appendix 2.

When there are concerns that a **child may be in need of help** the DSL will act immediately and make contact with pastoral support/early help or the Tri Borough Local Safeguarding Children Board, depending on the nature of the concerns. **If the child is deemed to be at risk**, the DSL will discuss this matter readily, and within 24 hours of a disclosure, with the Tri Borough Local Safeguarding Children Board. This may be done tentatively and without giving names in the first instance. What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the School should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate any allegation. All verbal conversations should be promptly and accurately recorded in writing.

➢ Children who have suffered or are likely to suffer significant harm

Children who have suffered or are likely to suffer significant harm should be referred to Children's Social Care immediately. If it appears that a child has suffered or is likely to suffer significant harm, the DSL (or in his absence the relevant Deputy DSL) will make a formal report as soon as possible, at least within 24 hours by telephone to the Local Safeguarding Children Board (**LSCB**) in the area of the child's residence. Subsequent actions will follow agreed inter agency procedures.

Although decisions to seek support for a child in need would normally be taken in consultation with parents, the consent of parents or the child is not required and will not be sought for a referral where there are reasonable grounds to believe that a child is at risk of harm.

➢ Children in need of additional support

Should a child be in need of additional support from one or more agencies, the School will keep in close touch with such agencies, assist with interagency assessment using local processes, including the use of the *Common Assessment Framework* (**CAF**) and *Team around the Child* (**TAC**) approaches. The DSL or the relevant Deputy DSL will attend any relevant meetings and will follow agreed procedures.

To help make decisions on the child's level of need and the appropriate services, the School will refer to the LCSB's thresholds and eligibility criteria available at:

www.rbkc.gov.uk/subsites/lscb/professionals.aspx

The school recognises that children with special educational needs (SEND) and/or disabilities can face additional safeguarding challenges without appropriate support, as they may not be able to communicate abuse which is taking place. The SEND/Learning Enrichment Department (LED) provide additional support to these children, as set out in our Learning Support Policy.

- **Pupils at risk of radicalisation**

If it appears that a pupil is at risk of radicalisation, or displays any indication that they have been exposed to extremism, the DSL must be informed immediately. The DSL (who has undertaken Prevent training) will consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care. All members of the Designated Safeguarding Team and Senior Management Team have undertaken online Prevent training and staff have been trained, either through online training and/or an information sheet or face to face training.

Although decisions to seek support for a child in need, including when there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

- **Female Genital Mutilation (FGM)**

It is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, this will be done through the DSL or one of the Deputy DSLs who will also involve children's social care as appropriate.

- **Children missing education (CME)**

Staff must report to the relevant Head and DSL any unexplained absences, any agreed absences that are prolonged and any indication that a pupil / family have a planned absence in term time that has not been approved by the Head. Office staff will contact parents to seek an explanation when a child does not come into school and share this information with the class teacher and, where necessary, the Head and DSL. Parents should provide the school with at least two emergency contacts for their child.

In addition, the following circumstances will also be reported to the local authority where the child lives:

- ten days of unauthorised absence (other than for reasons of sickness);
- failure to attend regularly;
- if a child has been taken out of school to be home educated;
- if a family has apparently moved away;
- if a child has been certified as medically unfit to attend;
- if a child is in custody for more than four months, or has been permanently excluded.

This duty arises as soon as the grounds above are met and in any event before deleting a child's name from the admission register.

In the case of a child leaving the School when the next school is not known; the circumstance will be reported as soon as possible to the Local Authority (**LA**) in which the pupil lives.

- **Mental / Physical Health**

All staff must be aware 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. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood. Our In-School pupil counsellor will be available to work with these children, as the need arises.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be struggling with their mental health or be at risk of developing a problem. Symptoms of these changes might be: significant changes in behaviour; not wanting to do things they normally like or withdrawing from social situations. Staff must also be alert to more serious symptoms of mental ill-health, such as eating disorders or self-harming.

Staff must immediately report any concerns to the DSL. This includes any observation of deterioration of a child's health, either mental or physical.

The DSL will discuss any cases with the relevant Head and ensure that support is put in place for these children.

KCSIE 2020 links to further information and best practice guidance: *Mental health and behaviour in schools* and also *Promoting children and young people's emotional health and well-being: a whole school and college approach.*

- **Private Fostering**

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. There is a mandatory duty to inform the local authority of children of such arrangements, so teachers should inform the DSL and relevant Head immediately if they have reason to believe a child is being privately fostered.

- **Early Help**

Early help means providing support as soon as a problem emerges at any point in a child's life. All school staff should be prepared to identify children who may benefit from early help, as providing support at this stage is more effective in promoting the welfare of the children that reacting later. Support practices may form part of early help strategies and should feed into Local Authority early help measures as required. Evidence will be kept of all early help interventions.

In the first instance, staff should discuss early help requirements with the DSL. They will then take the lead but staff may be required to support other agencies and professionals in an early help assessment. Chapter 1 of *Working Together to Safeguard Children (2018)* provides detailed guidance on the early help process.

4. SAFEGUARDING PRACTICES

Pastoral and Safeguarding Education

At Garden House, we promote the welfare of children through our Assembly programmes and the wider PSHE and RSE curriculums. We aim to provide pupils with a wide view of what may happen not only in schools but also beyond. Pupils are taught how to keep themselves safe and build resilience. They are given information to avoid situations and persons which could lead them into harm.

Online Safety / Internet Safety

The school does not allow pupils to bring internet enabled devices to school. However, the school realises its responsibility to promote e-safety and prevent cyberbullying and radicalisation. Any incidents of cyberbullying will be dealt with in accordance with the school's anti-bullying policy. The school employs a series of filters to ensure that pupils are kept safe online and especially that extremist sites are in no way accessible. We adhere to the UKCIS guidelines regarding online safety. Certain sites are blocked by our filtering system and our IT Department can monitor pupils' use of the network. We have strong anti-virus and malware protection on our network and effective filtering of sites with untoward content which is provided by Smoothwall. All social networking sites and video sharing sites are blocked for the children by default. Automated systems are in place which monitor email traffic, filtering SPAM and malicious attachments.

Safe use of electronic equipment and the internet is promoted through the ICT and PSHE curriculums. There are also regular discussions in classrooms and assemblies regarding Internet Safety. The DSL has overall responsibility for this. Children are taught strategies to adjust their behaviours in order to reduce risks and build resilience. Children are taught to understand the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

For more details on Internet Safety, please see our policy: *Pupils' use of ICT, Mobile Phone and other Electronic Devices (for the whole school, including EYFS)*

5. ALLEGATIONS OF ABUSE BY A TEACHER OR MEMBER OF STAFF

Allegations of abuse by a teacher or member of staff are taken extremely seriously. In order not to jeopardise any Police investigation it is important that any such allegations are **immediately** referred to the Tri Borough Local Authority Designated Officer (**LADO**) before any investigation takes place and within one working day. The school will not undertake any investigation of their own in this situation until advice has been sought from the LADO. In borderline cases these discussions can be held informally and without naming the individual. In a case of serious harm, or if a criminal offence is suspected, the police should be informed from the outset. The LADO should also be contacted for referrals when an allegation has been made against an adult who works with children. Such allegations are handled by the relevant Head, the Proprietor and Co-Principals.

Contact details for the Tri Borough LADO are on page 2 and in Appendix 1.

For full details of the procedure that follows a referral see DfE Guidance; *KCSIE 2020.*

These procedures should be used in respect of all cases in which it is alleged that a member of staff (or volunteer) has:

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

If any member of staff or other adult in the School receives an allegation against a member of staff or a volunteer, or if they themselves have concerns about the behaviour of a member of staff or a volunteer, this should be reported to the relevant Head or the DSL straight away. The DSL will inform the relevant Head or, in her / his absence, the Proprietorial Body Board-Level Lead. If the DSL or the relevant Head is the subject of the allegation, the report should be made to the Proprietorial Body Board-Level Lead without her / him being informed.

If one or more of the Proprietors/Partners are the subject of the allegation the report should be made immediately to the LADO.

This relates to staff or volunteers who are currently working at the School regardless of where the alleged abuse took place. Allegations against a teacher who is no longer teaching will be referred to the police.

The purpose of an initial discussion is for the LADO to provide advice to the relevant Head and / or the Proprietorial Body Board-Level Lead, to consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed.

The relevant Head and / or Proprietorial Body Board-Level Lead, should inform the accused person about the allegation as soon as possible after consulting the LADO, unless a strategy meeting is needed (see next paragraph). She / he should provide them with as much information as possible at the time.

If the allegation is not demonstrably false or unfounded, and there is cause to suspect a child is suffering or is likely to suffer significant harm, or police or social services need to be involved, a strategy meeting should be convened. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take account of the fact that teachers are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.

The relevant Head will not inform the accused person about the allegation until agencies have been consulted, and have agreed what information can be disclosed to the person. The relevant Head will give due weight to the views of the LADO and will, in discussion with the Proprietorial Body Board-Level Lead, consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place.

Where it is clear that an investigation by the police or local authority children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO should discuss the next steps with the relevant Head and Proprietorial Body Board-Level Lead. In those circumstances the options open to the School depend on the nature and circumstances of the allegation and the evidence and information available, and will range from taking no further action to summary dismissal or a decision not to use the person's services in future.

Suspension should not be the default position – an individual should only be suspended if there is no reasonable alternative. In some such cases, further enquiries will be needed to enable a decision about how to proceed. If so, the relevant Head or Proprietorial Body Board-Level Lead should discuss with the LADO how and by whom the investigation will be undertaken. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving the reasons for the suspension. The person should be informed at that point who their named contact is within the organisation and provided with their contact details.

Supporting the member of staff

Employers have a duty of care to their employees. The School will act to minimise the stress inherent in the allegations and disciplinary process. Support for the individual is key to fulfilling this duty. A member of staff will be informed of a concern or allegation as soon as possible and given an explanation of the likely course of action, unless there is an objection by social services or the police. They will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be given access to welfare counselling or medical advice provided by the School.

The School will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate. Particular care will be taken when an employee is suspended to ensure that they are kept informed of both the progress of their case and current work related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Resignations and 'Compromise Agreements'

The fact that a person tenders his or her resignation, or ceases to provide their services, will not prevent an allegation being followed up in accordance with these procedures. It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but a conclusion will be reached and recorded wherever possible. So called 'compromise agreements', by which a person agrees to resign, if the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, will not be used in these cases. In any event, such an agreement will not prevent a thorough police investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the **DBS** (see below) where circumstances require.

Record keeping

For all other allegations that are not found to be malicious, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file. A copy must also be provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.

It will provide clarification in cases where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. Employment Practices Code and supplementary guidance provides some practical advice on employment retention.

Referral to DBS/TRA

The School is committed to promptly report to DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is they have caused harm or posed a risk of harm to a child. Failure to make such a report constitutes an offence. In the instance of having to dismiss a teacher (or the teacher would have been dismissed had she/he not resigned), the school will also consider whether making a referral to the Teaching Regulation Agency (TRA) is appropriate. Further details can be found in: *Teacher misconduct: the prohibition of teachers (October 2015)* and further guidance is published on the TRA website.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer engaging / refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching; contract working; a course of initial teacher training, or volunteering. Compromise agreements cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The Proprietor and Co-Principals recognise that they have a legal duty to respond to requests from the DBS for information that they hold already, but they do not have to find it from other sources. They will disclose to inspectors all instances of action in relation to safeguarding concerns.

Supply Staff

We do not currently employ supply staff but know that if we choose to do so and there are any allegations made against them, we must in no circumstances simply cease to use them but instead must take the lead on investigations whilst also keeping the supply agency fully informed.

6. UNFOUNDED ALLEGATIONS

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to a child or to an individual facing the allegation or concern. In which case the decision and a justification for it should be recorded by both the relevant Head and the LADO, and agreement reached as to what information should be put in writing to the individual concerned and by whom. The relevant Head should then consider with the LADO what action should follow in respect of the individual and those who made the initial allegation.

Details of allegations that are found to have been malicious will be removed from personnel records. Cases in which an allegation was proven to be unsubstantiated, unfounded or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. should also not be included in any reference.

If an allegation is determined to be unfounded or malicious, the LADO may refer the matter to the relevant local authority children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else. In the event that an allegation is shown to have been deliberately invented or malicious, the relevant Head and the Proprietorial Body Board-Level Lead will consider whether any disciplinary action is appropriate against the person who made it, and the police may be asked to consider whether any action might be appropriate against the person responsible, even if he or she was not a pupil.

7. ALLEGATIONS OF ABUSE BY A PUPIL OR PUPILS ON ANOTHER PUPIL (PEER ON PEER / CHILD ON CHILD ABUSE)

Abuse is not just an adult crime. Children can pose a threat either physically or sexually to other children (peer-on-peer/child-on child abuse) and we recognise that gendered abuse can also occur.

Staff are aware of the many different forms that this type of abuse can take, including: bullying, online bullying, sexual violence, sexual harassment, physical abuse, up-skirting, sexting (youth-produced sexual imagery), initiation/hazing type violence and rituals. None of these are acceptable and will all be treated seriously.

It is essential that any allegation of abuse made by a pupil against another pupil/pupils in the School is dealt with fairly, quickly, and consistently, in a way that provides effective protection for all of the children involved. Any allegation should immediately be reported to the DSL, or in their absence, the relevant Deputy DSL.

The DSL will:

- Investigate if the incident is abuse, or an isolated instance of bullying or 'experimentation', in which case the incident will be handled in the normal framework for discipline. (See Behaviour and Discipline Policy)
- Determine the frequency, nature and severity of the incident
- Ascertain if the victim was coerced by physical force, fear or by a pupil or pupils significantly older than himself / herself or with power or authority over him / her
- Ascertain whether the incident involved a potentially criminal act

A distinction needs to be drawn between behaviour best dealt with by anti-bullying policies and more complex behaviour. Abuse should never be tolerated or passed off as 'banter', 'having a laugh' or 'part of growing up'. A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.' In such cases, the DSL will seek advice from the Tri Borough LSCB. Procedures will then be followed as for any other allegation of abuse.

During and subsequent to the investigation, all the children concerned will need considerable support and, whether perpetrator or victim, will be treated as being "at risk". They will continue to be monitored closely and supported after any investigation has closed. Whilst advice as to the nature of this will be discussed with the LSCB and other agencies, the School will also give consideration to pastoral and other arrangements in the School, and make any necessary adjustments.

We would not normally send the alleged victim home, pending such an investigation, without consultation with the LSCB, the Police or other agencies.

Suspension of the pupil, against whom an allegation has been made, needs careful consideration, and the Head will seek advice from the LSCB before deciding on the course of action to be taken.

Pupils alleged to have sexually abused another should be subject to risk assessment for their continuing education on site, in consultation with the LSCB.

Every effort is made at Garden House to ensure that there are procedures in place to minimise the risk of peer-on-peer abuse. These include: ensuring that children are never left unsupervised by staff and, where possible, staff are always in ear-shot of conversations; a thorough PSHE curriculum providing education on these issues; pairing older children with younger ones across the school to act as mentors; and ensuring that the 'kindness code' underpins everything we do and say.

Sexting

Sexting involves someone sharing sexual, naked or semi-naked images or videos of themselves or others, or sending sexually explicit messages. A number of children own their own mobile phone and, whilst these are not permitted in school, the school is mindful of the potential risks outside school and acknowledges its responsibility to educate the children as to how to use these devices responsibly, especially for life beyond and after their time at Garden House (see *Policy on Pupils' Use of ICT, Mobile Phones and other Electronic Devices For the whole school including EYFS – Online Safety* for more details.)

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. It is an offence to possess, distribute, show and make indecent images of children. A child is classified as anyone under the age of 18. As of January 2016, even though a young person may have broken the law, the police may choose to take no further action if they deem it not in the public interest. It is however important that such instances are not simply passed off as harmless 'banter' (see *Sexting in schools and colleges: responding to incidents and safeguarding young people', UKCCIS, January 2017*).

8. TRAINING

Each time Part One of KCSIE is updated by the DfE, existing staff are updated. This is particularly important when new duties are introduced. Part One of KCSIE will be read by all staff and in addition, Annex A will also be read by school leaders and staff who work directly with children.

The DSL will keep full training records for the School and will ensure that:

a) All members of the Designated Safeguarding Team will be trained in safeguarding and child protection at least every 2 years to the appropriate level (formerly 'Level 3'). This will include local inter-agency working protocols and training in the LSCB's approach to *Prevent* duties and will be provided either by the local social services department or an LSCB approved external agency.

b) All staff who may come into contact with children including non-teaching staff are trained in safeguarding child protection regularly to the appropriate level (formerly 'Level 1'). The Designated Safeguarding Team, with up to date inter-agency training, will sometimes provide this training for staff. After the initial training, regular updates will be provided to staff (at least annually) and formal training place will take place at least every 3 years. This training will allow staff to develop their understanding of the signs and indicators of abuse so they can respond to any child welfare concerns in accordance with the School's safeguarding procedures. Online courses may also be used.

As per the School's Staff Induction Policy, training is given to all newly appointed staff, temporary staff and volunteers and will include:

i. the School's Safeguarding and Child Protection policy;

ii. the staff code of conduct/behaviour policy including whistleblowing procedures and the acceptable use of ICT, mobile phones and other electronic devices policy;

iii. the identity of the DSL and the Deputies;

iv. a copy of Part 1 of KCSIE (September 2020) is available for all staff to read and Annex A is also available for school leaders and staff who work directly with children;

v. The pupil behaviour policy

vi. The school's safeguarding response to children who go missing from education

vii. Policy on Pupils' Use of ICT, Mobile Phones and other Electronic Devices – Including EYFS (Online Safety Policy)

In addition, part of their induction will include discussion of the policy with one of the designated persons with up-to-date inter agency training. Newly appointed staff commencing employment within term time will receive training from the DSL, or other agency, approved by the Local Authority.

All members of staff are trained and receive regular updates in e-safety.

9. SAFER RECRUITMENT

Safer recruitment practices are always followed through our rigorous recruitment processes and procedures for staff, striking a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. The selection and recruitment of staff includes verification of identity, qualifications and a satisfactory enhanced DBS check for their suitability for work. All staff that regularly come into contact with pupils, including support staff such as cleaners and caterers, will be required to have a DBS check on appointment and give consent to the School for the DBS to be checked periodically (at present, every 3 years). These checks will also be carried out on existing staff with a break in service of more than three months. At least two members of Senior Management staff will also complete Safer Recruitment Training, which will be renewed as necessary.

Management Checks

S128 checks are carried out on the following people: Proprietor and Co-Principals, Heads and Senior Leaders. If someone has been prohibited from the management of schools, this will appear on their DBS certificate.

See Recruitment Policy for further details

10. CONFIDENTIALITY

We recognise that all matters relating to safeguarding are confidential, subject to overriding legal obligations to disclose information to ensure the safety and well-being of a child. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The school employs a Data Protection Officer and complies with the General Data Protection Regulation (**GDPR**), May 2018, but acknowledges that there are occasions where safeguarding and child protection obligations will supersede the requirements of GDPR.

The Head or DSL will disclose any information about a pupil to other members of staff on a need to know basis only consistent with legal requirements and in accordance with relevant DfE guidance. The Head or DSL, LSCB and Police will agree who needs to know about the matter, exactly what information can be shared, how to manage speculation, and how to manage any press interest.

All staff are made aware that they have a professional responsibility to share information with the DSL and Deputy DSLs in order to safeguard children and, likewise, staff are made aware that the School has a responsibility to share these concerns with other agencies if they feel the situation is escalating or further support is needed.

All staff are made aware that they cannot promise a child that they can keep any secrets as it might compromise the child's safety or wellbeing.

We will always inform parents / carers of an allegation affecting their child as soon as possible if they already do not know of it. However, where a Strategy Meeting is required, the DSL or Head will consult with the LSCB and other relevant agencies such as the Police beforehand to agree what information can be disclosed to parents so as not to put the child at greater risk of harm, or impede a criminal investigation. Parents/carers will normally be kept informed about the progress of the case and told the outcome where there is no criminal prosecution, including the outcome of any disciplinary process, in confidence.

11. WHISTLEBLOWING

What is whistleblowing?

Employment legislation provides protection for members of staff who raise legitimate concerns about specified matters called "protected disclosures", otherwise known as "whistleblowing". This includes concerns about criminal activity, miscarriages of justice, health and safety risks (including safeguarding concerns), damage to the environment, or concealment of any of these matters, in relation to the School's activities.

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of safeguarding, which may include the attitude or actions of colleagues.

See Whistleblowing Policy.

12. MANAGEMENT OF SAFEGUARDING

a) Responsibilities

The responsibilities of the Proprietor and Co-Principals are:

- To ensure that there is a designated 'board-level lead' in relation to the responsibility for the safeguarding arrangements. Although the safeguarding duties remain the responsibility of the proprietorial body, the board-level lead should hold a Level 3 Safeguarding training certificate and have the required knowledge, skills and expertise to take leadership responsibility for the organisation's safeguarding arrangements.
- To ensure that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- To create an environment where staff feel supported in their safeguarding role and able to raise concerns.
- To operate Safer Recruitment procedures (please see separate Recruitment Policy for full details) in checking the suitability of staff and volunteers to work with children

including DBS checks and compliance with the independent school standard regulations.

- To ensure that sufficient resources are available for the proper training and support of the Heads, designated staff (Level 3, every 2 years), and all other staff (Level 1, every 3 years) in matters relating to the safeguarding of children.

To ensure that proper procedures for the safeguarding of children are in place and that they are reviewed annually along with the efficiency with which the related duties have been discharged.

The responsibilities of the Heads are:

- To preserve and foster the safe, caring, and open environment at Garden House.
- To support and encourage the designated staff and other members of staff in all matters relating to the safeguarding of children.
- To be familiar with the School's safeguarding procedures and monitor the effectiveness of them.
- To ensure all children, parents, and staff are familiar with, and support the aims of, the Garden House Kindness Code.
- To emphasise the role of good communication between all members of staff in matters relating to the safeguarding of children.
- To make part time and voluntary staff aware of the arrangements and procedures relating to the safeguarding of children at Garden House.
- To ensure that any deficiencies or weaknesses in Child Protection are remedied without delay.
- To ensure that all staff are aware of and adhere to our Code of Conduct.
- To ensure specific attention is given to situations where children are engaged in close one to one teaching, particularly in specialist music and sport provision.

The School has a trained team of Designated Safeguarding Staff, comprising of the DSL and four Deputy DSLs. Together they are responsible for:

- Referring a child to the LSCB whenever an allegation or disclosure of abuse has been made or if there are concerns about possible abuse, and acting as a focal point for staff to discuss concerns. All referrals will be carried out in accordance with local Social Care procedures within 24 hours of a disclosure.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely in accordance with the Data Protection Act 1998 and are kept separate from pupil records, and copied on separately from the main pupil file to the child's next school or college until the young person reaches 25 years of age.
- Ensuring that an indication of an additional file as detailed above is marked on the pupil's record.
- Liaising with other agencies and professionals and ensuring that contact with the relevant welfare agency will be made immediately upon the disclosure or suspicion of

abuse. The referral shall be made in writing or with written confirmation of a telephone referral.

- Ensuring that they provide reports for, and attend case conferences, core groups, or other multi-agency planning meetings, and otherwise co-operate with the LSCB and other agencies to support inter-agency working.
- Ensuring that any pupil currently subject to a child protection plan who is absent without explanation for two days is referred to the LSCB. Children who are not currently subject to a child protection plan should be referred after 10 consecutive days of unexplained absence.

Teaching staff, including Teaching Assistants, should:

- Be an open and caring ear for the children; a person to whom they can talk freely about any matters that may be worrying or harming them.
- Be familiar with the School's Safeguarding Policy and procedures.
- Attend training on matters relating to child protection including, in particular, recognising possible signs of abuse.
- Always report any concerns to the Designated Child Protection Staff (either the DSL or one of the Deputy DSLs).
- Follow the School's guidance on interacting with the children. See Appendix 3 – Restraint Policy and also the Staff Code of Conduct.
- Make the children aware of safeguarding including online, helping them to adjust their behaviour in order to minimise risk.

b) Supporting children

We recognise that a child who is abused or witness's violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.

We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

The School will support all pupils by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as in our relationships, whilst attempting to counteract aggression and bullying.
- Promoting a caring, safe and positive environment within the School.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children to make sure information is shared.
- Notifying the LCSB as soon as there is a cause for significant concern.
- Providing continued support to school leavers identified as potentially at risk of abuse, by ensuring that appropriate information is forwarded under confidential cover to the

pupil's new school and ensuring relevant medical records are forwarded as a matter of priority.

- Working with the Local Authority (or the Police as appropriate) where a child may have suffered significant harm, or there may be a criminal prosecution, to consider what support the child or children involved may need. This may be achieved via the "Team Around the Child" process.

c) Supporting Staff

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate. Staff are also encouraged to call Education Support's free confidential helpline on: 0800 562 561 if they require someone to talk to.

Where a member of staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. The Head will appoint a named representative to keep the individual informed of the progress of the case and consider what other support is appropriate. The investigation will be managed promptly.

d) Equality and Bullying

The Garden House School Equal Opportunities Policy sets out the School's commitment to ensure that action will be taken to prevent, and respond to, incidents of inappropriate discrimination, harassment and victimisation, in particular because of differences which arise out of gender or gender reassignment, pregnancy or maternity, special educational need or disability, race, religion or belief, cultural or linguistic background, or sexual orientation. The School acknowledges that repeated incidents or a single serious incident may lead to consideration under safeguarding procedures.

The School's policy on bullying is set out in The Behaviour Policy. The policy acknowledges that there may be times when a bullying concern may become a safeguarding concern and should be treated as such by the School. Bullying is always unacceptable and will not be tolerated at the School; it becomes a safeguarding concern where there is reasonable cause to believe that a child is suffering, or is likely to suffer, significant harm.

All cases of bullying will be reported to the relevant Head and the DSL. Records of bullying and racist incidents are kept with the Safeguarding Files held by the DSL.

e) Health & Safety

Our Health & Safety policy, set out in a separate document, details the measures being taken by the School to promote the health and safety of all children and staff within the School's environs. Other aspects, such as the procedures for internet use and School trips are set out in other School policies.

13. PHYSICAL INTERVENTION

The *Garden House School Restraint Policy* is set out in Appendix 3 of this policy, is available in the Staff Handbook, is available on the School network, and has regard to HM Government's Guidance: *'Use of reasonable force'*, July 2013. The policy acknowledges that Staff have a legal power to use reasonable force i.e. to use no more force than is needed in the circumstances to control or restrain pupils. Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. Physical intervention must be necessary and proportionate to the level of risk and will normally be used as a last resort. Where physical intervention has been necessary, the incident should be written up on the school's 'Restraint Record Form' and discussed with the DSL. The DSL will file and store these securely.

The School recognises that some physical contact is appropriate in the context of working with children and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

Staff should always avoid touching or restraining a pupil in a way that could be interpreted as sexually inappropriate conduct. Should this occur, this event should be recorded and signed by a witness, if there was one. The DSL must be informed immediately.

We understand that physical intervention of a nature which causes injury or distress to a child may need to be considered under child protection or disciplinary procedures.

We understand that force may never be used as a punishment.

All complaints about the use of force should be thoroughly, speedily and appropriately investigated. The School will follow its disciplinary procedures when managing a complaint about the use of force by staff, seeking advice from relevant agencies where appropriate.

14. PREVENTION

We recognise that the School plays a significant part in the prevention of harm to its pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The School community will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children know there is an adult in the School whom they can approach if they are worried or in difficulty. Children are made aware that there is a School Counsellor available to them.
- Incorporate into the curriculum, including Life and Culture, information and opportunities which equip children with the awareness and skills they need to stay safe from harm, both in reality and online, and to know to whom they should turn for help. Children attend sessions to educate them as to how to be safe and responsible users of the internet, in both Computing and Life and Culture lessons and also from external speakers at key events such as Safer Internet Day. In addition to this, the school teaches the children how to keep safe in a wide range of external settings including, for instance, USII attending workshops with Transport for London regarding safety on the London Underground and on London Buses.

The Proprietor and Co-Principals, Heads, DSL and Deputy DSL's will strive to ensure that staff have the skills, knowledge and understanding necessary to keep children safe.

All staff, including those working in the EYFS, know that the use of personal mobile phones and cameras is not permitted in the workplace.

15. MONITORING AND EVALUATION

Our Safeguarding policy and procedures will be monitored and evaluated by:

- Regular contact between the DSL, Deputy DSLs and Heads.
- Discussions with pupils and staff.
- Scrutiny of attendance data.
- Scrutiny of risk assessments.
- Monitoring of records of bullying and racist behaviour.
- Review of parental concerns.

16. REVIEW:

i) Children who have been suspected of abuse are kept on a register by the DSL. Their welfare is reviewed regularly.

ii) In order to maintain the effectiveness of the policy, the Heads, the Proprietor and Co-Principals will ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay;

iii) The Proprietor and Co-Principals will undertake a review of the School's child protection policies at least annually, including an update and review of procedures and their implementation and of the efficiency with which the related duties have been discharged. They ensure that the School contributes to interagency working in line with Working Together (2018) through effective implementation of the child protection policy and procedures, and good cooperation with local agencies.

17. JOB DESCRIPTIONS

There is a formal job description for the DSL and the Deputy DSLs; this is set out in Appendix 5 to this policy.

Approved by:	Proprietor/Co-Principals/Heads/DSL	**Date:** 10th September 2020
Last reviewed on:	10th September 2020	
Next review due by:	July 2021	

To be reviewed at least annually and immediately on any changes to statutory guidance. (By September 2021)

K. O'Sullivan (D.S.L.)

(Board Level Head)

Appendix 1 Contacts

Garden House School Safeguarding Staff

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Kate O'Sullivan	kosullivan@gardenhouseschool.co.uk 07730 063149
Deputy DSL (Turks Row)	Natalie Richmond Elvy	nrichmondelvy@gardenhouseschool.co.uk 07973 397593
Deputy DSL (EYFS)	Julia Adlard	jadlard@gardenhouseschool.co.uk 07881 823008
Head of Boys' School	Dan Jameson	djameson@gardenhouseschool.co.uk 07515 491 896
Head of Girls' School	Emma Studd	estudd@gardenhouseschool.co.uk 07774 139855
Local authority LSCB (social services)	Kensington and Chelsea Duty Line	socialservices@rbkc.gov.uk Tel: 020 7361 3013 (Out of hours – 020 7361 3013)
Local Authority Designated Officer (LADO)	Duty Child Protection Advisor	KCLADO.Enquiries@rbkc.gov.uk Telephone: 020 7361 3013
Garden House Board Level Lead	Mrs Sophie Strafford	strafford@gardenhouseschool.co.uk 020 7730 1652

Our designated team are aware of the necessity to safeguard the children at all three of our premises: 49 Holbein Mews, Sedding Street and Turk's Row.

Main School address:

Garden House School

Turk's Row

London

SW3 4TW

Boys' School Office: 020 7730 6652

Girls' School Office: 020 7730 1652

Proprietor and Co-Principals:	Mrs J K Oddy
	Mrs Sophie Stafford
	Mr Christian Warland
Head of Boys' School:	Mr Dan Jameson
Head of Girls' School:	Mrs Emma Studd
Head of EYFS:	Mrs Julia Adlard

Child protection specialists available in Kensington and Chelsea

(If the named individual is not available, please ask for the person covering the post)

Family and Children's Services

Kensington and Chelsea work in Partnership with Westminster, Hammersmith and Fulham to form the Tri Borough Local Children's Safeguarding Board (LSCB).

https://www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/contacts-safeguarding-kensington-and-chelsea

LSCB – Kensington and Chelsea Duty Line – Tel: 020 7361 3013 (Out of hours – 020 7361 3013) (for referral and advice on concerns about children)
Email: socialservices@rbkc.gov.uk

Hammersmith and Fulham – Tel: 020 8753 6610

Westminster – Tel: 020 7641 4000

Local Authority Designated Officer (LADO) – contact the Duty Line on 020 7361 3013 or email kclado@rbkc.gov.uk (for consultation, referral and management of allegations against staff). If a duty Child Protection Adviser cannot be reached, the LADO can be contacted directly.

Sarah Stalker (CSE Lead)
Family Support and Child Protection Adviser (Mon/Tues/Wed only)
Telephone: 020 7598 4640
Mobile: 07971 322 482
Email: sarah.stalker@rbkc.gov.uk

Prabha Vashee
Family Support and Child Protection Adviser
Mobile: 07890 380 253
Email: pvashee@westminster.gov.uk

Sharon Aggor
Family Support and Child Protection Adviser
Mobile: 07929 822 2840
Email: sharon.aggor@rbkc.gov.uk

Sarah Mangold
Interim Service Manager for Safeguarding, Bi-Borough
Mobile: 07984 016 841
Email: sarah.mangold@rbkc.gov.uk

Safeguarding and Child Protection Training, Consultation and Advice for Schools and Education:
Di Donaldson
Safeguarding Lead for Schools and Education
Mobile: 07890 397 061
Email: di.donaldson@rbkc.gov.uk

Tri-borough FGM:
Rochelle-Ann Naidoo
Tri-borough Senior Practitioner
Telephone: 020 7641 1610
Email: rnaidoo@westminster.gov.uk

Bi-borough PREVENT
Contact the local team on:
Telephone: 020 8753 5727
Email: prevent@lbhf.gov.uk

Tri-borough Multi-Agency Safeguarding Hub (MASH)
Karen Duncan
Tri-borough MASH Business Support Officer
Telephone: 020 7641 3991
Email: kduncan1@westminster.gov.uk

Bi-Borough Admissions and Access to Education (Children Missing Education, Child Employment and Elective Home Education enquiries)
Wendy Anthony
Bi-Borough Head of Admissions and Access to Education
Telephone: 020 7745 6440
Email: wendy.anthony@rbkc.gov.uk

In an emergency call the police on 999.

Contact details for other Prevent agency involvement include:

- *101 – The non-emergency police number*
- *DfE helpline/email for non-emergency advice for staff and governors: 020 7340 7264 or counter.extremism@eduction.gov.uk*

Appendix 2

Type of abuse and neglect (definitions taken from pages 8-10 of Keeping Children Safe in Education, September 2020)

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

Abuse: 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. 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. Children may be abused by an adult or adults or by another child or children.

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.

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 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 from participating in normal social interaction. It may 9 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.

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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 (see paragraph 29).

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, for example, 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.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Peer on peer/child on child abuse:

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

• bullying (including cyberbullying);

• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

• sexual violence, such as rape, assault by penetration and sexual assault;

• sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;

• upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

• sexting (also known as youth produced sexual imagery); and

• initiation/hazing type violence and rituals.

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Further help can be sought from Operation Encompass and the National Domestic Abuse Helpline

Honour Based Abuse (including FGM and Forced Marriage)

So-called 'honour-based' abuse (**HBA**) encompasses 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, sexting (also known as youth produced sexual imagery) and initiation/hazing type violence and rituals. Staff should be clear as to the school's policy and procedures with regards to peer-on-peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School staff can access government guidance as required on the issues listed below via GOV.UK and other government websites (links available in Annex A of Keeping Children Safe in Education, September 2020, pages 94-96 – online version)*:

- Abuse
- Bullying (including cyberbullying)
- Child criminal exploitation (county lines)
- Children missing from education (CME)
- Children with family members in prison
- Child Exploitation, including child sexual exploitation (CSE)
- Drugs
- So-called 'Honour-based' Abuse, including Female genital mutilation (FGM)
- Health and wellbeing
- Homelessness
- Online, including sexting
- Private Fostering
- Radicalisation (Prevent Duty)
- Upskirting
- Violence, including sexual violence

*Please note that all staff are required to read Part One of Keeping Children Safe in Education, September 2020 **AND** Annex A of the same document

RECOGNISING CHILD ABUSE – SIGNS AND SYMPTOMS

Recognising child abuse is not easy, and it is not your responsibility to decide whether or not child abuse has taken place or if a child is at significant risk. You do, however, have a responsibility to act if you have a concern about a child's welfare or safety.

The following information is not designed to turn you into an expert but it will help you to be more alert to the signs of possible abuse. The examples below are not supposed to form an exhaustive list.

1) Physical abuse

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which can almost only have been caused non-accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury or there are differing explanations. A delay in seeking

medical treatment for a child when it is obviously necessary is also a cuse for concern. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical child abuse include:

- bruising in children who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks or fingertips

Although bruising is the most common injury in physical abuse, fatal non-accidental head injuries and non-accidental fractures can occur without bruising. A doctor should see any child who has unexplained signs of pain or illness promptly.

Other physical signs of abuse may include:

- cigarette burns
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example wearing long sleeves in hot weather.

2) Emotional abuse

Emotional abuse can be difficult to measure, and often children who appear well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Children who live in households where there is domestic violence can often suffer emotional abuse. Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse may include:

- failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents" care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- self-harm
- fear of parents being approached.

3) Sexual abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers.

Usually, in cases of sexual abuse it is the child's behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- pain or itching in the genital areas
- bruising
- stomach pains
- discomfort when walking or sitting down

Changes in behaviour that can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away
- sexual knowledge which is beyond their age or developmental level
- sexual drawings or language
- bedwetting
- eating problems
- saying they have secrets they cannot tell anyone about

4) Neglect

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children. The physical signs of neglect may include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions.

Changes in behaviour which can also indicate neglect may include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

The above list is not meant to be definitive but should be used as a guide to assist you. It is important to remember that many children and young people will exhibit some of these indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring.

There may well be other reasons for changes in behaviour, such as a death or the birth of a new baby in the family, relationship problems between parents/carers, undiagnosed medical conditions etc.

5) FGM

A girl may confide that she is to have a special procedure or to attend a special occasion to become a woman.

Parents may state that they or a relative will take the child out of the country for a prolonged period.

A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.

6) CSE

Some of the following can be indicators of CSE:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

7) CCE

Some of the following can be indicators of CCE:

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

8) Going missing (CME)

A child going missing from education is a potential indicator of abuse or neglect. Office staff and class teachers should report to the relevant Head and DSL should any child be absent without any explanation.

9) Radicalisation

Symptoms of radicalisation may include absence of positive influences and strains associated with cultural transitions of identity, lifestyle and friendship. Young people at risk include those with limited social circles who befriend others on social media.

The Channel Vulnerability Assessment Framework may be useful:

This annex provides a description of the vulnerability assessment framework used by Channel to guide decisions about whether an individual needs support to address their vulnerability to being drawn into terrorism as a consequence of radicalisation and the kind of support t that they need.

It should not be assumed that the characteristics set out below necessarily indicate that a person is either committed to terrorism or may become a terrorist. The assessment framework involves three dimensions: engagement, intent and capability, which are considered separately.

a) Engagement with a group, cause or ideology

Engagement factors are sometimes referred to as "psychological hooks". They include needs, susceptibilities, motivations and contextual influences and together map the individual pathway into terrorism. They can include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

b). Intent to cause harm

Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- Over-identification with a group or ideology
- Them and Us' thinking
- Dehumanisation of the enemy
- Attitudes that justify offending
- Harmful means to an end
- Harmful objectives

c). Capability to cause harm

Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Factors can include:

- Individual knowledge, skills and competencies
- Access to networks, funding or equipment
- Criminal Capability

d) County Lines

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism103 should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Appendix 3

Garden House School Restraint Policy

- Staff must only use restraint in instances where a child's irresponsible behaviour could potentially either cause harm to themselves or another person, or in a situation where there is risk of accidental injury, e.g. whilst by the roadside, on or near stairs etc.
- Staff must only ever use physical intervention as a last resort, and at all times it must be the minimal force necessary to prevent injury.
- All incidents of restraint should be recorded in writing and reported to the relevant Head and should also be reported to a Designated Safeguarding member of staff on a restraint report form. (*See: GHStaff/Templates/Safeguarding reporting forms and documents/Safeguarding Restraint record form*)

Records of restraint are kept in staff personal files.

Appendix 4:

Working with Children one-to-one

Working with children in one to one situations requires additional safeguards to be in place. Adults working in one to one settings are more vulnerable to unfounded or malicious allegations being made against them. One to one situations also have the potential to make the child more vulnerable to harm by those who seek to exploit their position of trust. It is important that every effort is made to ensure the safety and security of children and the adults who work with them.

Teachers also need to recognise that they may also pick up on concerns about a child or a child may disclose that they are being abused.

Principles (from Safer Working Practice guidance 2019)

• The welfare of the child is paramount

• It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with children.

• Adults who work with children are responsible for their own actions and behaviour and should avoid any contact which would lead any reasonable person to question their motivation and their intentions.

• Adults should work and be seen to work, in an open and transparent way.

• The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious and /or sexual identity.

Working arrangements

• A teacher must carefully consider the needs and circumstances of the child when in one to one situations

• It is advisable to leave the door of the classroom open when working in a one to one situation. In cases where privacy is required, it is essential that the teacher and child are visible through a window at all times.

• If lone working is an integral part of the role, appropriate risk assessments should be undertaken and conditions agreed with the line manager.

Confidentiality

• Teachers have a duty to report any concerns regarding a child's welfare

• Teachers must be aware of the contents of the Safeguarding Children Policy and the name of the designated teacher

• If a child discloses any information about abuse, the teacher must not ask leading questions or promise confidentiality

• All concerns must be recorded, dated and signed

Appendix 5:

5.1 Job Description for the Designated Safeguarding Lead

The Proprietor and Co-Principals ensure that the School designates an appropriate senior member of staff to take lead responsibility for child protection, including implementing the Prevent duty (Designated Safeguarding Lead, DSL). This person should have the status and authority within the School to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. There should be regular review of the DSL's practice to ensure they improve over time.

The broad areas of responsibility for the Designated Safeguarding Lead include managing the following areas for all of EYFS, KS1 & KS2 pupils:

1. **Managing referrals**

a. Refer all cases of suspected abuse to the local authority children's social care and:

- The Local Authority Designated Officer (**LADO**) for child protection concerns (all cases which concern a staff member); and/or
- Disclosure and Barring Service (**DBS**) for cases where a person is dismissed or resigns due to them posing a risk of harm to a child or causing harm to a child; and/or
- Police (cases where a crime may have been committed).

b. Liaise with the Heads to inform her / him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

c. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

d. When a child moves to a new school, proactively share any information with them to ensure that support is put in place. Also ensure that any child protection files are securely transferred.

2. **Training**

The Designated Safeguarding Lead will receive appropriate training carried out every two years in order to:

a. Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

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. Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.

d. Ensure all staff are trained in child protection and receive any new updates, in line with advice from the LSCB. In addition, ensure staff safeguarding professional development includes online safety and training that gives them knowledge and confidence to identify children at risk of being drawn into terrorism (prevent), to challenge extremist ideas and to know how to refer children and young people for further help.

e. Ensure that all new staff, including temporary staff and volunteers, are provided with induction training and documents which include:

   i. the School's Safeguarding and Child Protection policy;

   ii. the staff code of conduct/behaviour policy including whistleblowing procedures and the acceptable use of ICT, mobile phones and other electronic devices policy;

   iii. the identity of the DSL and the Deputies;

   iv. a copy of Part 1 of KCSIE (September 2020) is available for all staff to read and Annex A is also available for school leaders and staff who work directly with children;

   v. The pupil behaviour policy

   vi. The school's safeguarding response to children who go missing from education

   vii. Policy on Pupils' Use of ICT, Mobile Phones and other Electronic Devices – Including EYFS (Online Safety Policy)

f. Be alert to the specific needs of children in need, those with special educational needs and young carers;

g. Be able to keep detailed, accurate, secure written records of concerns and referrals; ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;

h. Obtain access to resources and attend any relevant or refresher training courses;

i. 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.

3. **Raising Awareness**

The Designated Safeguarding Lead will ensure the School's policies are known and used appropriately:

a. Ensure the School's child protection / safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Proprietor and Co-Principals regarding this.

b. 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.

c. Ensure that online safety is being promoted and adhered to by staff and students throughout the school.

d. Link with the Tri-Borough Safeguarding Children Board to make sure staff are aware of training.

5.2 The broad areas of responsibility for the Deputy Designated Safeguarding Lead are:

- Attend Safeguarding Meetings – (these occur at least once every half term)
- Be a source of knowledge and point of contact for staff regarding all safeguarding issues
- Hold a Level 3 Safeguarding Certificate (renewed every two years)
- Participate in whole school staff training, as appropriate

In the absence of the DSL to deputise in the following areas:

1. **Managing referrals**

a. Refer all cases of suspected abuse to the local authority children's social care and:

- The Local Authority Designated Officer (**LADO**) for child protection concerns (all cases which concern a staff member); and/or
- Disclosure and Barring Service (**DBS**) for cases where a person is dismissed or resigns due to them posing a risk of harm to a child or causing harm to a child; and/or
- Police (cases where a crime may have been committed).

b. Liaise with the Heads to inform her / him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

c. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

d. When a child moves to a new school, proactively share any information with them to ensure that support is put in place. Also ensure that any child protection files are securely transferred.

2. **Training**

e. Ensure that **all** new staff, including temporary staff and volunteers, are provided with induction training that includes:

i. the School's Safeguarding and Child Protection policy;

ii. the staff code of conduct/behaviour policy including whistleblowing procedures and the acceptable use of ICT, mobile phones and other electronic devices policy;

iii. the identity of the DSL and the Deputies;

iv. a copy of Part 1 of KCSIE (September 2020) is available for all staff to read and Annex A is also available for school leaders and staff who work directly with children;

v. The pupil behaviour policy

vi. The school's safeguarding response to children who go missing from education

vii. Online Safety *(Policy on Pupils' Use of ICT, Mobile Phones and other Electronic Devices – Including EYFS – Online Safety)*

Appendix 6 – Child protection and safeguarding

COVID-19 addendum

Response when Garden House School is closed

Approved by:	Proprietor/Co-Principals/Heads/DSL	**Date:** 10th September 2020
Last reviewed on:	10th September 2020	
Next review due by:	July 2021 (ongoing due to Covid-19)	

K O'Sullivan (D.S.L.)

(Board Level Head)

Contents

Important contacts
1. Scope and definitions
2. Core safeguarding principles
3. Reporting concerns
4. DSL (and deputy) arrangements
5. Working with other agencies
6. Monitoring attendance
7. Peer-on-peer abuse
8. Concerns about a staff member or volunteer
9. Support for children who aren't 'vulnerable' but where we have concerns
10. Safeguarding for children not attending school
11. Online safety
12. Mental health
13. Staff recruitment, training and induction
14. Children attending other settings
15. Monitoring arrangements
16. Links with other policies

Important contacts

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Kate O'Sullivan	kosullivan@gardenhouseschool.co.uk 07730 063149
Deputy DSL (Turks Row)	Natalie Richmond Elvy	nrichmondelvy@gardenhouseschool.co.uk 07973 397593
Deputy DSL (EYFS)	Julia Adlard	jadlard@gardenhouseschool.co.uk 07881 823008
Head of Boys' School	Dan Jameson	djameson@gardenhouseschool.co.uk 07515 491 896
Head of Girls' School	Emma Studd	estudd@gardenhouseschool.co.uk 07774 139855
Local authority LSCB (social services)	Kensington and Chelsea Duty Line	socialservices@rbkc.gov.uk Tel: 020 7361 3013 (Out of hours – 020 7361 3013)

ROLE	NAME	CONTACT DETAILS
Local Authority Designated Officer (LADO)	Duty Child Protection Advisor	KCLADO.Enquiries@rbkc.gov.uk Telephone: 020 7361 3013
Garden House Board Level Lead	Mrs Sophie Strafford	strafford@gardenhouseschool.co.uk 020 7730 1652

1. Scope and definitions

This addendum applies during the period of school closure due to COVID-19, and reflects updated advice from our local safeguarding partners and local authority (**LA**) – the RBKC LSCB.

It sets out changes to our normal child protection policy in light of the Department for Education's guidance *Coronavirus: safeguarding in schools, colleges and other providers*, and *Safeguarding and remote education during Coronavirus (COVID-19)*. This document should be read in conjunction with that policy.

Unless covered here, our normal safeguarding policy continues to apply.

The Department for Education's (**DfE's**) definition of 'vulnerable children' includes those who:

- Have a social worker, including children:
  - With a child protection plan
  - Assessed as being in need
  - Looked after by the local authority
- Have an education, health and care (**EHC**) plan

2. Core safeguarding principles

We will still have regard to the statutory safeguarding guidance, *Keeping Children Safe in Education 2020*.

Although we are operating in a different way to normal, we are still following these important safeguarding principles:

- The best interests of children must come first
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- A designated safeguarding lead (**DSL**) or deputy should be available at all times (see section 4 for details of our arrangements)
- It's essential that unsuitable people don't enter the school workforce or gain access to children
- Children should continue to be protected when they are online

3. Reporting concerns

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this.

If a member of staff has a concern about a child they should continue to contact the DSL or a Deputy DSL as soon as possible, using the contact details on page 2 of this appendix.

As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

4. DSL (and Deputy DSL) arrangements

The DSL and/or a Deputy DSL and/or one of the Heads will be contactable at all times.

We will ensure that the DSL (and Deputies), wherever their location, know who the most vulnerable children in our school are.

The DSL, Deputy DSLs and Heads will:

- Identify the most vulnerable children in school
- Update and manage access to child protection files, where necessary
- Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessments

5. Working with other agencies

We will continue to work with children's social care for looked-after and previously looked-after children.

We will continue to update this addendum where necessary, to reflect any updated guidance from:

- The local authority about children with education, health and care (**EHC**) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need

6. Monitoring attendance

As most children will be attending school over zoom during this period of school closure, we will still be completing our usual morning attendance registers and following our usual procedures to follow up on non-attendance.

If a child does not attend a lesson on zoom, we will:

- Follow up on their absence with their parents or carers, by phone and/or email.
- Notify their social worker, where they have one

For those who are attending school in person, we are using the Department for Education's daily online attendance form to keep an accurate record of who is attending school.

https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings

We will make arrangements with parents and carers to make sure we have up-to-date emergency contact details, and additional contact details where possible.

7. Peer-on-peer / child-on-child abuse

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse.

Staff are aware of the many different forms that this type of abuse can take, including: bullying, online bullying, sexual violence, sexual harassment, physical abuse, up-skirting, sexting (youth-produced sexual imagery), initiation/hazing type violence and rituals.

Staff should continue to act on any concerns they have immediately. Concerns should continue to be passed onto the DSL (or Deputy DSL) and/or the relevant Head.

8. Concerns about a staff member or volunteer

We will continue to follow the principles set out in part 4 of Keeping Children Safe in Education.

Staff should continue to act on any concerns they have immediately.

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (**DBS**).

We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this for any teacher who has been dismissed (or would have been dismissed had he/she not resigned). We will do this using the email address *Misconduct.Teacher@education.gov.uk* for the duration of the COVID-19 period, in line with government guidance.

We do not currently employ supply staff but know that if we choose to do so and there are any concerns about their professional conduct, we must in no circumstances simply cease to use them but instead must take the lead on investigations whilst also keeping the supply agency fully informed.

9. Support for children who aren't 'vulnerable' but where we have concerns

We have the option to offer places in school to children who don't meet the Department for Education's definition of 'vulnerable', but who we have safeguarding concerns about. We will work with parents/carers to do this.

If these children will not be attending school, we will put a contact plan in place, as explained in section 10.1 below.

10. Safeguarding for children not attending school

10.1 Contact plans

We have contact plans for children with a social worker and children who we have safeguarding concerns about, for circumstances where:

- They won't be attending school (for example where the school, parent/carer and social worker, if relevant, have decided together that this wouldn't be in the child's best interests); or
- They would usually attend but have to self-isolate

These plans set out:

- How often the school will make contact

- Which staff member(s) will make contact
- How they will make contact

We have agreed these plans with children's social care where relevant, and will review them regularly (at least once a month).

If we can't make contact, we will contact children's social care or the police.

10.2 Safeguarding all children

Staff and volunteers are aware that this difficult time potentially puts all children at greater risk.

Staff and volunteers will continue to be alert to any signs of abuse, or effects on pupils' mental health that are also safeguarding concerns, and act on concerns immediately. In particular, children are likely to be spending more time online (see section 11 below).

11. Online safety

11.1 In school

We will continue to have appropriate filtering and monitoring systems in place in school.

11.2 Outside school

Where staff are interacting with children online, they will continue to follow our existing staff code of conduct.

Staff must only contact children through school-approved remote learning platforms (Zoom, Google Classroom and SeeSaw) and must not engage in 1:1 live video conferencing with any child, unless a parent or carer is also present. For group Zoom meetings (form times/lessons) the usual standards of appropriate language and dress must be adhered to. Staff should broadcast themselves in front of a neutral background and, failing this, should use an appropriate Zoom 'virtual background'. All communications must remain professional and within usual school hours. Staff must always only use their school email address for communicating with pupils and parents and never give out their personal mobile number.

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 3 of this addendum.

We will make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

All Zoom sessions will be recorded and stored for 6 months, in line with our Privacy Notice, at which point they will be deleted, unless any issues have been raised.

11.3 Working with parents and carers

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online

Parents are and will be reminded of this whenever classes are taught remotely.

12. Mental health

Where possible, we will continue to offer our current support for pupil mental health for all pupils. Class teachers will continue to offer pastoral support to all children through form times (on Zoom) and when providing verbal feedback to children.

When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health, including pressure on parents who may be working from home.

13. Staff recruitment, training and induction

13.1 Recruiting new staff and volunteers

We continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in our school are safe to work with children.

We will continue to follow our safer recruitment procedures, and part 3 of Keeping Children Safe in Education.

In urgent cases, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at our school.

We will continue to do our usual checks on new volunteers, and do risk assessments to decide whether volunteers who aren't in regulated activity should have an enhanced DBS check, in accordance with paragraphs 167-172 of Keeping Children Safe in Education.

13.2 Safeguarding induction and training

We will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

New staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of our safeguarding policy (and this addendum)
- Keeping Children Safe in Education part 1 (and Annex A)

13.3 Keeping records of who is on site

We will keep a record of which staff and volunteers are on site each day, and that appropriate checks have been carried out for them.

We will continue to keep our single central record up to date.

14. Children attending other settings

Where children are temporarily required to attend another setting, we will make sure the receiving school is provided with any relevant welfare and child protection information.

Wherever possible, our DSL (or deputy) and/or special educational needs and disabilities co-ordinators (SENDCOs / Heads of Learning Enrichment and Development) will share, as applicable:

- The reason(s) why the child is considered vulnerable and any arrangements in place to support them

- The child's EHC plan, child in need plan, child protection plan or personal education plan
- Details of the child's social worker

Where the DSL, deputy or SENDCO can't share this information, the Head will do this.

We will share this information before the child arrives as far as is possible, and otherwise as soon as possible afterwards.

15. Monitoring arrangements

This policy will be reviewed as guidance from the LA or DfE is updated, and as a minimum every month by the DSL and Deputy DSLs. At every review, it will be approved by the Heads the Proprietor and Co-Principals.

16. Links with other policies

This policy is an appendix of the Safeguarding Policy and links to the following other policies:

- Staff Code of Conduct (including email and internet/social media guidance)
- Behaviour Policy (including anti-bullying)
- Policy on Pupils' Use of ICT, Mobile Phones and other Electronic Devices - for the whole school including EYFS (Online Safety)
- Recruitment Policy

Appendix 7 – Child protection and safeguarding

COVID-19 addendum

Response when Garden House School is open

Approved by:	Proprietor/Co-Principals/Heads/DSL	**Date:** 10th September 2020
Last reviewed on:	10th September 2020	
Next review due by:	July 2021 (ongoing due to Covid-19)	

K. O'Sullivan (D.S.L.)

(Board Level Head)

Important contacts

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Kate O'Sullivan	kosullivan@gardenhouseschool.co.uk 07730 063149
Deputy DSL (Turks Row)	Natalie Richmond Elvy	nrichmondelvy@gardenhouseschool.co.uk 07973 397593
Deputy DSL (EYFS)	Julia Adlard	jadlard@gardenhouseschool.co.uk 07881 823008
Head of Boys' School	Dan Jameson	djameson@gardenhouseschool.co.uk 07515 491 896
Head of Girls' School	Emma Studd	estudd@gardenhouseschool.co.uk 07774 139855
Local authority LSCB (social services)	Kensington and Chelsea Duty Line	socialservices@rbkc.gov.uk Tel: 020 7361 3013 (Out of hours – 020 7361 3013)
Local Authority Designated Officer (LADO)	Duty Child Protection Advisor	KCLADO.Enquiries@rbkc.gov.uk Telephone: 020 7361 3013
Garden House Board Level Lead	Mrs Sophie Strafford	strafford@gardenhouseschool.co.uk 020 7730 1652

1. Scope and definitions

This addendum applies during the period of school being open to pupils but making allowances for COVID-19, and reflects updated advice from our local safeguarding partners and local authority (**LA**) – the RBKC LSCB.

It sets out changes to our normal child protection policy in light of the Department for Education's guidance *Coronavirus: safeguarding in schools, colleges and other providers*, and should be read in conjunction with that policy.

Unless covered here, our normal safeguarding policy continues to apply.

The Department for Education's (**DfE's**) definition of 'vulnerable children' includes those who:

- Have a social worker, including children:
  - With a child protection plan
  - Assessed as being in need
  - Looked after by the local authority

- Have an education, health and care (**EHC**) plan

2. **Core safeguarding principles**

We will still continue to operate in light of the statutory safeguarding guidance, *Keeping Children Safe in Education 2020*.

Although we are operating in a different way to normal, we are still following these important safeguarding principles:

- The best interests of children must come first
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- A designated safeguarding lead (DSL) or deputy should be available at all times (see section 4 for details of our arrangements)
- It's essential that people deemed to be unsuitable don't enter the school workforce or gain access to children
- Children should continue to be protected when they are online
- Parents are not allowed into the school building unless by prior arrangement

3. **Reporting concerns**

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this.

If a member of staff has a concern about a child they should continue to fill in one of our Garden House Referral forms and contact the DSL or a Deputy DSL as soon as possible, using the contact details above.

As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

4. **DSL (and Deputy DSL) arrangements**

The DSL and/or a Deputy DSL and/or one of the Heads will be contactable at all times. Should the DSL be absent due to Covid-19, a Deputy DSL (see list above) will step up and fulfil the role.

We will ensure that the DSL (and Deputies), know who the most vulnerable children in our school are.

The DSL, Deputy DSLs and Heads will:

- Identify the most vulnerable children in school
- Update and manage access to child protection files
- Liaise with parents, as appropriate
- Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessments

5. **Working with other agencies**

We will continue to work with children's social care if we have any looked-after or previously looked-after children.

We will continue to update this addendum where necessary, to reflect any updated guidance from:

- The local authority about children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need

6. **Monitoring attendance**

All children will be attending school from September and therefore will be completing our usual attendance registers and following our usual procedures to follow up on all non-attendance.

N.B. Should the situation revert to one where some, or most children will not be attending school during a period of full or partial school closure, we will not be completing our usual attendance registers or following our usual procedures to follow up on non-attendance.

The exception to this is where any child we expect to attend school during the closure doesn't attend, or stops attending. In these cases we will:

- *Follow up on their absence with their parents or carers, by phone and/or email.*
- *Notify their social worker, where they have one*

We will use the Department for Education's daily online attendance form to keep an accurate record of who is attending school.

https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings

We will make arrangements with parents and carers to make sure we have up-to-date emergency contact details, and additional contact details where possible.

7. **Peer-on-peer/ child-on-child abuse**

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer/child-on-child abuse.

Staff are aware of the many different forms that this type of abuse can take, including: bullying, online bullying, sexual violence, sexual harassment, physical abuse, up-skirting, sexting (youth-produced sexual imagery), initiation/hazing type violence and rituals.

Staff should continue to act on any concerns they have immediately. Concerns should continue to be passed onto the DSL (or Deputy DSL) and the relevant Head.

8. **Concerns about a staff member or volunteer**

We will continue to follow the principles set out in part 4 of Keeping Children Safe in Education.

Staff should continue to act on any concerns they have immediately and contact the DSL/Head/LADO

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this using the email address Misconduct.Teacher@education.gov.uk for the duration of the COVID-19 period, in line with government guidance.

We do not currently employ supply staff but know that if we have to resort to this due to staff illness during this time and there are any concerns about their professional conduct, we must in no circumstances simply cease to use them but instead we must take the lead on investigations whilst also keeping the supply agency fully informed.

9. **Safeguarding for children not attending school**

In the rare instance that a pupil is unable to attend school because they are complying with clinical or public health advice, school will continue to provide an online learning for them through the 'see-saw' platform. The school will continue to maintain contact with that child and ensure they have access to staff, as required. See section 10.2 below for more details regarding keeping them safe online.

9.1 **Contact plans**

We currently have no children with contact plans at school.

There may be a future need to have contact plans for children with a social worker and children who we have safeguarding concerns about, for circumstances where:

- They won't be attending school (for example where the school, parent/carer and social worker, if relevant, have decided together that this wouldn't be in the child's best interests); or
- They would usually attend but have to self-isolate

These plans would set out:

- How often the school will make contact
- Which staff member(s) will make contact
- How they will make contact

We would have agreed these plans with children's social care where relevant, and would review them regularly (at least once a month).

Should we not be able to make contact, we will contact children's social care or the police.

9.2 Safeguarding all children

Staff and volunteers are aware that as many children have not attended school for the whole of the summer term, they potentially have been at greater risk.

Staff and volunteers will continue to be alert to any signs of abuse, or effects on pupils' mental health that are also safeguarding concerns, and act on concerns immediately. In particular, children are likely to be spending more time online (see section 11 below).

10. **Online safety**

10.1 **In school**

We will continue to have appropriate filtering and monitoring systems in place in school.

10.2 **Outside school**

Where staff are interacting with a pupil who is unable to attend school because they are complying with clinical or public health advice they will continue to follow our existing staff code of conduct.

Staff must only contact children through school-approved remote learning platforms (Zoom, Google Classroom and SeeSaw) and must not engage in 1:1 live video conferencing with any child, unless a parent or carer is also present. Staff must always only use their school email address for communicating with pupils and parents and never give out their personal mobile number. For Zoom meetings (form times/lessons) the usual standards of appropriate language and dress must be adhered to. Staff should broadcast themselves in front of a neutral background and, failing this, should use an appropriate Zoom 'virtual background'. All communications must remain professional and within usual school hours.

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 3 of this addendum.

We will make sure children who are having online educational provision from home know how to report any concerns they have back to our school, and signpost them to other sources of support too.

All Zoom sessions will be recorded and stored for 6 months, in line with our Privacy Notice, at which point they will be deleted, unless any issues have been raised.

10.3 Working with parents and carers

We will make sure parents and carers:

- Are kept informed and up to date with how the school is providing a safe learning environment for their children
- Have access via email, telephone or pre-booked appointments to class teachers, the DSL and the Senior Management Team should they wish to discuss any concerns.

11. Mental health

Where possible, we will continue to offer our current support for pupil mental health for all pupils. The in-school child psychotherapist, will offer sessions on a Tuesday. The DSL and both of the voluntary school counsellors are undertaking an online children's mental health course in order to facilitate the support of children too. In creating these roles, it is hoped that children will have greater access to Early Help at this uncertain time. Class teachers will continue to offer pastoral support to all children throughout the school day.

When returning to school in September, all staff will be aware of the pressure that many of our pupils have been under for the last term of remote learning and support them appropriately. Any pupils we knew about who were anxious about their return have been contacted by their class teacher and invited to a short zoom meeting for the pupil and their parents to chat about any concerns. A classroom tour has also been offered so that they can feel more confident when they return in person.

12. Staff recruitment, training and induction

12.1 Recruiting new staff and volunteers

We continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in our school are safe to work with children.

We will continue to follow our safer recruitment procedures, and part 3 of Keeping Children Safe in Education.

In urgent cases, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at our school.

We will continue to do our usual checks on new volunteers, and do risk assessments to decide whether volunteers who aren't in regulated activity should have an enhanced DBS check, in accordance with paragraphs 167-172 of Keeping Children Safe in Education.

12.2 Safeguarding induction and training

We will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

New staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of our safeguarding policy (and this addendum)
- Keeping Children Safe in Education part 1 and Annex A
- Access to an online Level 1 Safeguarding course (educare)

12.3 Keeping records of who's on site

We will continue to keep a record of which staff are on site each day, and that appropriate checks have been carried out for them. We aim to keep visitors to the site at an absolute minimum and by prior appointment only.

We will continue to keep our single central record up to date.

13. Children attending other settings

Where children are temporarily required to attend another setting, we will make sure the receiving school is provided with any relevant welfare and child protection information.

Wherever possible, our DSL (or deputy) and/or special educational needs and disabilities co-ordinators (SENDCOs / Heads of Learning Enrichment and Development) will share, as applicable:

- The reason(s) why the child is considered vulnerable and any arrangements in place to support them
- The child's EHC plan, child in need plan, child protection plan or personal education plan
- Details of the child's social worker

If the DSL, deputy or SENDCO can't share this information, the Head will do this.

We will share this information before the child arrives as far as is possible, and otherwise as soon as possible afterwards.

14. **Monitoring arrangements**

This policy will be reviewed as guidance from the LA or DfE is updated, and as a minimum every month by the DSL and Deputy DSLs. At every review, it will be approved by the Heads and Proprietor and Co-Principals.

15. **Links with other policies**

This policy is an appendix of the Safeguarding Policy and links to the following other policies:

- Staff Code of Conduct (including email and internet/social media guidance)
- Behaviour Policy (including anti-bullying)
- Policy on Pupils' Use of ICT, Mobile Phones and other Electronic Devices - for the whole school including EYFS (Online Safety)
- Recruitment Policy