

**Safeguarding & Child Protection Policy**

**Introduction**

Whitehall School fully recognises the responsibility it has under Section 157 (for Independent Schools, Academies and City Technology Colleges) of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children in the EYFS setting and the main school. This Policy refers to the EYFS including Whitehall School Nursery and the Main school from Year 1 to Year 6. It refers to the guidance, ‘Keeping Children Safe in Education (2019) (KCSIE) incorporating Disqualification under the Childcare Act 2006’ & ‘Working Together to Safeguard Children (2019) (WT)’.

At Whitehall School we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

The term ‘staff’ in this policy shall include all members of staff, paid or unpaid, temporary or permanent, full or part time.

Through their day-to-day contact with pupils and direct work with families, staff at Whitehall School have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to Social Care via the LADO at Cambridgeshire Direct Contact Centre. The school draws on the expertise of the staff in shaping the Safeguarding arrangements and policies.

At Whitehall School pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

**The LADO is: Janet Farr – 01223 727968**

**The Cambridgeshire LADO Unit: 01223 727967**

**Referral Number (from 1st December 2018):**

**Tel:  0345 045 5203**

**Email:**referralcentre.children@cambridgeshire.gov.uk

The Main Designated Safeguarding Lead (DSL) for the school is currently Chris Holmes, the Head Teacher with Deborah Parker, the School Manager as Deputy DSL. He will be responsible for all referrals. The Nursery Manager, is also DSL for the Early Years. In the absence of any named DP, the referral will be made by Ms Hutley, the Principal and Director responsible for Child Protection. She will maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and will monitor the effectiveness of policies and practice. As Proprietor, she is responsible for the Annual Safeguarding Review which is reported to the Board of Directors.

This policy also sets out how the Directors discharge their responsibilities relating to safeguarding and promoting the welfare of pupils at Whitehall School.

This policy is in compliance with the Independent School Standards Regulations and is in accordance with Local Safeguarding Partnership procedures and locally agreed inter-agency procedures.

Whitehall School acknowledges that LSCBs are to be replaced in 2018 by three new ‘local safeguarding partners’. These will be the local authority, a local clinical commissioning group and a chief of police for a local police force. The statutory guidance explains their duties and how they will work in collaboration with others to improve safeguarding practice locally. Safeguarding partners have power to designate ‘relevant agencies’ who will then be required to co-operate and act in accordance with published local arrangements.

It is made available for parents on the school website and from the School Office upon request.

**There are four main elements to our policy**

1. Prevention through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos

2. Procedures for identifying and reporting cases – or suspected cases – of abuse. The definitions of the four categories of abuse are attached in Appendix A.

3. Supporting vulnerable children who have been abused or witnessed violence towards others.

4. Preventing unsuitable people working with children

Our policy applies to all staff, paid and unpaid, permanent and temporary, full or part time working in the school, and also to volunteers and Directors. Teaching Assistants, Midday Supervisors and the School Administrator as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the school and its Directors.

1. **Prevention**

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children. The school will therefore:

* Establish and maintain an environment where children feel safe in both the real and virtual world, are encouraged to talk and are listened to.
* Ensure that children know that there are adults in the school who they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate
* Include in the curriculum and PSHE lessons, activities and opportunities which equip children with the skills they need to stay safe from abuse both in the real and the virtual world and information about who to turn to for help. This will include helping children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. These practices will be age-appropriate and delivered through planned components of the curriculum. Children should understand the risks posed by adults and young people who use internet and social media to bully, groom, abuse or radicalise other people.
* Include in the curriculum, material which will help children develop realistic attitudes to the responsibilities of adult life.

Whitehall School is committed to ensuring up to date training on all areas of Safeguarding children. The key Staff training elements are:

Induction Training – this is mandatory and includes;

* the Safeguarding & Child Protection policy;
* the Behaviour policy;
* the staff behaviour policy (sometimes called a code of conduct);
* the safeguarding response to children who go missing from education; and
* the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (see KCSIE)
* A copy of Part 1 of KCSIE, updated version (2019)
* A copy of KCSIE Annex A
* Online Safety

DSLs – attend training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.

All other staff – will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

1. **Procedures**

We will follow the procedures set out in the Cambridgeshire Local Safeguarding Partnership ‘Core Inter-Agency Procedures’, a copy of which can be found on their website.

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Whitehall School. The key role of the Designated Safeguarding Lead and Deputy & Early Years DP will have their role included in their job description, which is to:

* manage referrals from school staff or any others from outside the school;
* work with external agencies and professionals on matter of safety and safeguarding;
* undertake training;
* raise awareness of safeguarding and child protection amongst the staff and parents; and
* ensure that child protection information is transferred to the pupil’s new school

*Whitehall School will:*

* Have at least 2 designated senior member of staff (DSL) who has undertaken, as a minimum, the two-day training for designated personnel run by The Education Child Protection Service. The DSL will have a copy of the Designated Person Information Booklet which contains all relevant guidance and advice to support and carry out their role effectively. This is currently Mr Holmes, the Head Teacher with Deborah Parker, the School Manager and the Nursery Manager and Head of Early Years, also trained DPs. In the absence of the DSL and Deputy, the Manager of the Nursery will be consulted or in the case that she is the subject of an allegation, any report of abuse should be made to Miss Rebecca Hutley, the director responsible for child protection from the Board of Directors.
* Ensure that this child protection training and also inter-agency working is updated every two years in accordance with government guidance.
* Recognise the importance of the role of the designated person and ensure that they have the time, training and support necessary to undertake their duties which include, providing advice and support to staff, taking part in inter-agency meetings and contributing to the assessment of children in need.
* Ensure that all staff including temporary staff and any volunteers receive training in Child Protection, in line with the Local Safeguarding Partnership guidelines. This training can be given by the local social services department or an external welfare agency acceptable to the local safeguarding children board. Within the school, those who are designated persons with up to date inter-agency training may also provide the training for other staff. Ensure that all staff including temporary staff and volunteers newly appointed to positions within the school receive Child Protection training as part of their induction programme, and not only receive the training but measures are taken to understand, which will include:
	+ The School’s Safeguarding & Child Protection policy
	+ The staff code of conduct including Whistleblowing, acceptable use of IT
	+ The School’s Behaviour Policy
	+ The School’s practice on Children Missing in Education

The identity of the Designated person(s)

* + A copy of Part 1 of KCSIE, updated version (2019)
	+ A copy of KCSIE Annex A
	+ Online Safety
* Ensure that all staff are aware of the process for making referrals and for statutory assessments under the Children Act 1989 that may follow a referral and the role that they may be expected to play in such assessments.
* Child Protection training to staff from the point of induction should be updated regularly at least annually, so that all staff are confident about:
	+ The school’s legislative responsibility
	+ Their personal responsibility
	+ The school’s policies and procedures
	+ The need to be alert to the signs and indicators of possible abuse, including possible child sexual exploitation and female genital mutilation
	+ The need to record concerns
	+ How to support and respond to a child who tells of abuse
* All staff receive an updated Safeguarding Training including the Prevent Training by the DSL annually at the September Inset Days and are given a copy of the updated version of Part 1 of KCSIE and Annex A and time to read it. The Prevent Strategy requires that all staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism.
* The DSL has had the new Prevent Training to assess the risk of children being drawn into terrorism, including being drawn into support for the extremist ideas that are part of terrorist ideology.
* Ensure that every member of staff and volunteers and the Board of Directors know:
1. the name of the DSL and their role
2. that they have an individual responsibility for referring child protection concerns
3. how to identity the signs and indicators of possible abuse and neglect
4. how to pass on and record concerns about a pupil
5. that “Core Inter-Agency Procedures” can be found on their website
6. that there are procedures in place to protect staff if they report allegations of abuse by another member of the school community
7. that they have responsibility to provide a safe environment in which children can learn
* Ensure that every member of staff, volunteers and the Directors are aware that in the absence of any named DP, any referrals should be made to the Director with responsibility for Child Protection issues, Ms Rebecca Hutley. She will either contact the DSL as a matter of urgency or seek advice from the Education Child Protection Service Advice Line.
* Ensure that members of staff and volunteers are aware of the need to be alert to signs of abuse and know how to respond to a pupil who may report abuse. The school refers staff to the following resources; ‘What to do if you are worried a child is being abused – advice for practitioners’ and the NSPCC website.
* Ensure all paid and unpaid staff recognise their duty and feel able to raise concerns about poor and unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies.
* Have a relevant Staff of Teachers Code of Conduct Policy which is included in all new staff induction, see Whitehall School Teachers Code of Conduct Policy.
* Ensure that all members of staff understand that although the DSL or the Principal should be the responsible staff for making referrals, these can in fact be made by any member of staff, if necessary and do not need parental consent.
* Ensure that this policy is made public via the school website.
* Ensure that parents are informed of the responsibility placed on the school and staff in relation to child protection by setting out these duties on the school website.
* Work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at initial case conferences, core groups, child in need meetings and safeguarding review conferences
* Ensure that the DSL takes advice from a child protection specialist when managing complex cases. The designated person has access to the advice line run by the Education Child Protection Service and Social Care for ‘what if’ conversations. The Emergency Duty Team (out of hours) is also available. See Useful Contacts in Appendix B.
* Appoint a nominated Director for safeguarding and child protection who has undertaken appropriate training. This is Ms Rebecca Hutley.
* Ensure that all staff and volunteers recognise their duty and feel able to raise concerns about poor or unsafe practice and that such concerns are addressed sensitively and effectively in a timely manner
* Ensure that parents are informed of the responsibility placed on the school and staff with regard to child protection via the Parent Handbook
* Provide for parents, if requested, a copy of the school’s Safeguarding and Child Protection Policy and have a copy of the policy on the School website.
* Ensure that any deficiencies or weaknesses in Child Protection arrangements are remedied without delay.
* Ensure that staff understand Whitehall School’s confidentiality and information sharing policy, which is based on the guidance document ‘Information sharing: advice for practitioners providing safeguarding services’ (DfE, 2015).

*The school’s DSL will:*

* Support staff who make referrals to local authority children’s social care;
* Support staff who make referrals to the Channel programme;
* Refer cases where a crime may have been committed to the Police as required.
* Refer cases to the Channel programme where there is a radicalisation concern as required;
* Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
* Understand and support the school with regards to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation
* Liaise with the Principal to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
* As required, liaise with the “case manager” (as per Part four of KCSIE) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member)
* Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
* Act as a source of support and advice to staff
* Take responsibility for On-line safety
* When a child moves school, in addition to handing over the child protection file safely, share information to enable the new school to have support in place when a child arrives and to ensure that key staff such as the SENDCo are aware of any needs of the child

*All staff should:*

* Be aware of the signs of possible abuse. See Appendix A. Staff should be aware of concerns such as children running away or going missing and Female Genital Mutilation & Child Sexual Exploitation where relevant. In the case of FGM, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out.
* 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 safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.
* Know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children’s social care. Staff should never promise a child that they will not tell anyone about an allegation as this may ultimately not be in the best interests of the child.
* understand the need to avoid asking leading questions if talking to children about allegations

Whitehall school has set out a clear reporting procedure for adults to report concerns they have about children:

When adults in the school have a concern about a child or young person they should:

Complete a concern form in writing promptly or within 10 minutes of their concern.

Concern Forms can be found in the School Office.

The DSL should be informed that a concern has been raised in person in the School Office and the concern form handed to her directly. All verbal conversations should be promptly recorded in writing. Where the DSL is not available in person in the school office, he should be sent an email and a text message sent to her mobile phone. In the absence of the DSL, Chris Holmes the same procedure should be taken with the Deputy DP, Deborah Parker. She should be sent an email and a meeting arranged promptly in the School Office where the concern form has been handed in.

If the DSLs are not available, staff should speak to a member of the SLT and/or take advice from local children’s social care (KCSIE (2019)

*The Early Years Department will:*

* inform Ofsted of any allegations against people working at the school, or of any other abuse alleged to have taken place on the premises, within 14 days, or as soon as possible.

*Regarding liaison with other agencies, Whitehall School will:*

* Work to develop effective links with relevant services to promote the safety and welfare of all pupils
* Co-operate as required with key agencies in their enquiries in line with Working Together to Safeguard Children 2018, in their enquires regarding child protection matters including attendance and providing written reports at child protection conferences and core groups
* Notify the local Social Care team immediately if it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently)
* Notify the local Social Care team immediately if there is an unexplained absence of a pupil who is subject to a Child Protection Plan
* Notify the local Social Care team immediately if there is any change in circumstance to a pupil who is subject to a Child Protection Plan

*Regarding record keeping, Whitehall School will:*

* Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even when there is no need to refer the matter to Social Care immediately
* Ensure all records are kept securely, separate from the main pupil file, and in a locked location
* Ensure all relevant child protection records are sent to the receiving school or establishment when a pupil moves schools in accordance with the Education Child Protection Record Keeping Guidance

*Regarding confidentiality and information sharing, Whitehall School will:*

* Ensure that Child Protection information will be stored and handled in line with the Data Protection Act 1998 principles & GDPR regulations 2016. The Data Protection Act does not prevent school from sharing information with relevant agencies, where that information may help to protect a child.
* Child Protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parents to see child protection requests, they will refer the request to the Designated Person or Principal.
* Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager of the Social Care team as required. The document ‘Information sharing: Guidance for practitioners and managers’ is available from www.education.gov.uk
* Ensure that the Principal or designated personnel will only disclose any information about a pupil to other members of staff on a ‘need to know’ basis.
* Make all staff aware that they have a professional responsibility to share information with other agencies in order to safeguard children
* Ensure staff are clear with children that they cannot promise confidentiality
* All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.
* Based on KCSIE 2019 guidelines, all records of allegations of sexual abuse will be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

*When communicating with parents/carers, Whitehall School will:*

* Ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to child protection by setting out its duties on the school website.
* Undertake appropriate discussion with parents/carers prior to the involvement of another agency unless the circumstances preclude this action. See ‘Core Inter-Agency Procedures’ for further information.
* Ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to Child Protection via the Parent Hand book.

**What staff should do if they have a concern about a child**

**It must be made clear the difference here between a concern and if a child is deemed to be in ‘immediate danger’. If a child is in immediate danger or is at risk of harm a referral should be made to children’s social care or the police immediately.**

When a member of staff may have a concern about a child they need to decide what action to take. Where possible this would be a conversation with the DSL, although any member of staff can make a referral to children’s social care. Parental consent is not necessary for a referral to social care. If anyone other than the DSL makes the referral they should inform the DSL as soon as possible or the Director responsible for Child Protection, Ms Hutley. The Local Authority should make a decision within one day of a referral being made, what course of action they are taking and let the referrer know the outcome. If, after a referral the child’s situation does not seem to be improving the DSL should press for a re-consideration.

If early help is appropriate the DSL should support the staff member in liaising with other agencies. If early help is appropriate, the case should be kept under constant review and consideration given to a referral if the child’s situation is not improving.

**Procedures for dealing with an allegation of abuse against a member of staff**

* Staff and volunteers, because of their daily contact with children in a variety of situations, are vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils, parents, or persons with parental responsibility. Whitehall School will deal with allegations in a timely and sensitive manner, bearing in mind the rights of both pupil and staff member.
* In accordance with *Dealing with allegations of abuse against teachers and other staff* (2011) and Part 4 of KCSIE, changes state that procedures need to be applied with common sense and judgement (whereas before schools had to follow the required procedures closely); allegations found to be malicious should be removed from personnel records (whereas before all allegations had to be retained); records must be kept of all other allegations but any that are not substantiated, are unfounded or malicious should not be referred to in employer references (whereas before details of all allegations had to be passed on in references).
* The school will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries – both in the real and virtual world – in their relationships with pupils and parents/carers. The school will ensure that staff and volunteers are aware that sexual relationships with pupils under 18 are unlawful and could result in legal proceedings against them under the Sexual Offences Act 2003 (Abuse of Trust).
* The school will ensure that staff and volunteers are aware of the need for communication between pupils and adults, by whatever method, to be transparent, that they take place within clear and explicit boundaries and are open to scrutiny.
* Guidance will be offered to staff and volunteers, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on).
* An allegation of abuse made against any member of staff, a volunteer within the school, a designated person or one of the Board of Directors will be reported straight away to the Principal or the DSL, in which case the Principal must be kept updated. It is advised that a designated person should be contacted (unless he or she is the object of the allegation), since the designated person may have received higher level safeguarding training. If the Principal is absent, the allegation should be passed to the Board of Directors through the DSL. In cases where the Principal is the subject of an allegation, the person receiving the allegation should immediately inform the Board of Directors through the DSL without notifying the Principal first. In cases of serious harm, the police should be involved from the outset. As the Principal is also a Proprietor and the Board are family members, allegations should be reported directly to the LADO. The LADO(s) should be informed within one working day of all allegations that come to an employer’s attention or that are made directly to the police.
* Any referral of an allegation of abuse against a member of staff or volunteer will take place without delay. At Whitehall School we recognise the possibility that adults working in the school may harm children. Any concerns about the conduct of other adults in the school should be taken to the Principal without delay (or where that is not possible, to the Designated Safeguarding Lead); any concerns about the Principal should go to the Board of Directors who can be contacted by phone: 01223 461001.
* In the event of allegations of abuse being made against the Principal who may also be a proprietor of Whitehall School, an independent school, allegations should be reported directly to the designated officer(s) at the local authority. Staff may consider discussing any concerns with the school’s DSL and make a referral by them.
* When deciding whether to make a referral, following an allegation or suspicion of abuse, the Principal and or DSL will not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the LADO. This may be done tentatively and without giving names in the first instance. What appears minor 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 the allegations of abuse (*What to do if you’re worried a child is being abused*, 10.2 and 10.3). The Principal should be told or kept informed if the DSL makes a referral. Where the Principal is not available, the allegation should be reported to the Chair of Governors. Where the concern may be about the Principal, the individual receiving the concern may make a referral directly to the LADO. The LADO should be informed within one working day of all allegations that come to an employer’s attention or that are made directly to the police.
* Immediate contact will be made with the LADO to discuss the allegation 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 the individual and the parents of the child agreed. We will give due weight to the views of the LADO and to this policy when making a decision about suspension of staff.
* We will make every effort to maintain confidentiality and guard against unwanted publicity.
* Whitehall School will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
* If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made to the school’s procedures or practice to help prevent similar events in the future.
* Whitehall School is required to submit a report to the DBS, as soon as possible, on conclusion of an investigation where a person has been removed from regulated activity. This includes any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. 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. Failure to make a report constitutes an offence.
* **The DBS can be contacted on: 0870 9090811**
* **Their address for referrals is: DBS, PO Box 110, Liverpool. L69 3JD**
* Any member of staff who has received an allegation, founded or unfounded will be reported to the TRA (Teacher Registration Agency), within 28 days, where the teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: ‘unacceptable professional conduct’, ‘conduct that may bring the profession into disrepute’ or a ‘conviction, at any time, for a relevant offence’. Where a referral has been made to the DBS, it is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold however, for DBC referral, separate consideration should be given to a TRA referral.

**What staff should do if they have concerns about the safeguarding practices within the school**

All staff and volunteers should feel able to raise concerns about poor or unsafe practices and potential failures in the school’s safeguarding regime and that such concerns will be taken seriously by the SMT.

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

* a criminal offence has been committed, is being committed or is likely to be committed
* an legal obligation has been breached
* there has been a miscarriage of justice
* the health or safety of any individual has been endangered
* the environment has been damaged
* information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

Please see the separate Whistleblowing Policy for full information on the procedure in this case.

**Responsibility of Directors/Proprietors**

The Directors fully recognise their responsibilities with regard to child protection, safeguarding and the promotion of child welfare.

*They will:*

* Appoint a Director for safeguarding and child protection who will monitor the school’s compliance with statutory requirements and practice and champion child protection issues. This will be Ms Rebecca Hutley. The nominated Director will undertake an annual review of the school’s safeguarding policies and procedures in discussion with the Child Protection Officer to ensure the efficiency with which related duties have been discharged. The Director with Child Protection responsibility will report her findings to the Full Board of Directors annually. *Safeguarding is a collective responsibility for the whole Board of Directors.*
* Ensure that an annual report from the Principal is made to the Board of Directors to ensure effective oversight of safeguarding policy and practice at Whitehall School.
* Annually review Child Protection policies and procedures and how well they have been carried out. Ensure that all meetings with the DSL and Board have sufficient detailed minutes to show how the review has ensured effective implementation of the Safeguarding Policy and procedures and effective communication and good cooperation with local agencies.
* Ensure that any deficiencies or weaknesses in Child Protection arrangements are remedied without delay.
* Consider how children may be taught about safeguarding, including online, through the curriculum and PSHE. Particular attention should be paid to the school practices to help children adjust their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet.
* Ensure that the staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This includes ensuring that staff have up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers, and information available to the designated person.
* Ensure that the data protection compliance cannot be allowed to stand in the way of safeguarding children
1. **Supporting Vulnerable Children**

Whitehall School recognises that abuse or witnessing violence may have an adverse impact on children that may last into adulthood without appropriate intervention and support. Such children may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. The school may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at school a child’s behaviour may be challenging and defiant or they may become withdrawn. We recognise that some vulnerable children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

There is a difference between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. As described above, the former will be reported to Children’s Social Care immediately and the latter will lead to inter-agency assessment using local processes, including the use of the ‘Common Assessment Framework (CAF)’ and ‘Team around the Child (TAC)’ approaches.

Where children are identified as being at risk of radicalisation, we will consider the level of risk to identify the most appropriate referral. There is no need for consultation with parents or pupils for a referral based on concerns about radicalisation where there are reasonable grounds to believe that the child is at risk of significant harm.

As part of the PSHE curriculum, staff will teach children personal safety skills commensurate with their ability and needs. Children will be taught personal safety skills such as telling and who to tell, good and bad touches and good and bad secrets. We want children to know how to raise concerns and have access to a range of adults with whom they can communicate.

Whitehall School takes serious consideration of the list of specific safeguarding issues of KCSIE and acknowledges that abuse can take place wholly onine or technology may be used to facilitate online abuse.

*Whitehall School will support vulnerable children through:*

* The content of the curriculum to encourage self-esteem and self-motivation
* An ethos that actively promotes a positive, supportive and safe environment and gives pupils a sense of being valued
* Making specific safeguarding arrangements where children are engaged in close one-to-one teaching, particularly in music and sports.
* The school’s Behaviour & Discipline Policy will support vulnerable pupils in school. All staff will agree on a consistent approach which focuses on the behaviour of the child but does not damage the pupil’s sense of self-worth. The school will ensure that the pupil knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
* Liaison with other agencies which support pupils such as Social Care, Child and Adolescent Mental Health Services, the Education Psychology Service, Behaviour Support Services and the Education Welfare Service.
* A commitment to develop productive and supportive relationships with parents/carers
* Recognition that children living in a home environment where there is domestic abuse, drug or alcohol abuse or mental health issues are vulnerable and in need of support and protection; they may also be young carers
* Monitoring and supporting pupil’s welfare, keeping records and notifying Social Care in accordance with the Cambridgeshire Local Safeguarding Children Board ‘Core Inter-Agency Procedures’.
* Transferring information about a child, with a Child Protection Plan, to their new school immediately. The Child Protection Review Manager and the Lead Social Worker from Social Care will also be informed.
* Children who have suffered or are likely to suffer significant harm should be reported to Children’s Social Care immediately and those who are in need of additional support from one or more agencies should lead the school to inter-agency assessment using local processes, including use of the CAF and TAC approaches.
* When a child is missing from education, the school will follow the procedure as set out in Cambridgeshire’s Children Missing in Education guidance and inform the Education Welfare Officer and Social Care if a child is subject to a Child Protection Plan or there have been ongoing concerns.
* Where children are looked after by the local authority, the school will designate a person, usually the SENDCo who is responsible for ensuring that all staff have the skills, knowledge and understanding to keep these children safe. This designated person will have responsibility for the welfare and progress of the child with up to date assessment information being received from the Local Authority, the most recent care plan and contact arrangements with parents and delegated authority carers. This arrangement will take into account the guidance in ‘Promoting the Education of Looked after children’.

**Children with special educational needs (SEN) and disabilities**

These children can face additional safeguarding challenges.

Whitehall school will ensure that the child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

* assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
* children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

**Misuse of drugs and/or alcohol by parents/carers**

This is strongly associated with significant harm to children, especially when combined with other features such as domestic violence. When the school receives information about drug and alcohol abuse by a child’s parents/carers, child protection procedures will be followed, particularly if the following factors are present:

* Use of the family’s resources to finance the parent’s dependency, characterised by inadequate food, heat and clothing for the children
* Children exposed to unsuitable visitors e.g. customers or dealers
* The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
* Drug and alcohol use that leads to emotional unavailability, irrational behaviour and reduced parental vigilance
* Disturbed moods as a result of withdrawal symptoms or dependency
* Unsafe storage of drugs or injecting equipment and/or alcohol

**Intimate Care**

All children requiring intimate care will have an intimate care plan in place which is reviewed regularly. The Nursery has a Nappy Changing Policy which includes information about the staff regulations concerning Nappy Changing in the Nursery. All volunteers and staff who are involved in Intimate Care of Personal Care of children will have an enhanced DBS check with barred list included.

**Behaviour**

We recognise that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems will be particularly sensitive to indicators of abuse. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall plan of support, agreed with parents/carers.

**Domestic Abuse**

Where there is domestic abuse in a family, the child will always be affected. The longer the violence continues, the greater the risk of significant harm and enduring harm which they may carry with them into their adult life and relationships. Whitehall School will take appropriate action to ensure children are kept safe by referring to ‘Domestic Violence Guidance for Schools’, available from the Education Child Protection Service.

Head teachers and Principals are notified of Domestic Abuse incidents where the police have been called in and that involve children and young people on their roll and will take appropriate action to ensure children and young people are kept safe in accordance with the Domestic Violence Guidance for Schools.

**Peer – on – Peer Abuse**

Should an allegation of abuse, one pupil against another be made, any allegation will be reported to the relevant agency – LADO, Social Care of the Police within 24 hours. Procedures will follow the same route as for allegations against members of staff. We expect staff and volunteers to acknowledge that to allow or condone bullying, in the real or virtual world, constitutes a lack of duty of care which may lead to consideration under child protection procedures. Where there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm’ by another child/pupil, the case will be referred to local agencies. In the event of a disclosure of pupil on pupil abuse that all children involved, whether perpetrator or victim, are treated as being ‘at risk’.

In these cases, the victims of this abuse must be cared for and their safety and emotional state taken into consideration throughout the reporting process.

All staff should be alert to the risk of Peer on Peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers; they should never dismiss abusive behaviour as a normal part of growing up, or "banter", and should not develop high thresholds before taking action.

Whitehall School also acknowledges and staff are aware that children with SEND may be more vulnerable to peer on peer abuse.

This is most likely to include, but not 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, 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
* gender-based violence
* sexting (also known as youth produced sexual imagery); and
* initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Whitehall School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil

is of a serious nature, possibly including a criminal offence

raises risk factors for other pupils in the school

indicates that other pupils may have been affected by this student

indicates that young people outside the school may be affected by this student

At Whitehall School we will deal with peer – on – peer abuse by supporting and listening to both the victim and the perpetrator, recording the allegation and investigating its claims immediately. Staff should follow the referral process as set out in KCSIE 2018 and if in any doubt should contact the Designated Lead immediately.

**Sexting & Banter**

Pupil to pupil abuse includes ‘Sexting’ which is sending inappropriate photos to another child through text or social media, sexual assaults or comments between young people. Peer on Peer abuse should be taken as seriously as abuse by adults.

In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

**Female Genital Mutilation (FGM)**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

It is extremely harmful and has short and long term effects on physical and psychological health.

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries including the UK.

Risk factors for FGM include:

* low level of integration into UK society
* mother or a sister who has undergone FGM
* girls who are withdrawn from PSHE
* visiting female elder from the country of origin
* being taken on a long holiday to the country of origin
* talk about a ‘special’ procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an ‘at-risk’ country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

* difficulty walking, sitting or standing and may even look uncomfortable.
* spending longer than normal in the bathroom or toilet due to difficulties urinating.
* spending long periods of time away from a classroom during the day with bladder or menstrual problems.
* frequent urinary, menstrual or stomach problems.
* prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return
* reluctance to undergo normal medical examinations.
* confiding in a professional without being explicit about the problem due to embarrassment or fear.
* talking about pain or discomfort between her legs

The school takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children’s social care. The duty does not apply in relation to at risk or suspected cases.

The DSL will make appropriate and timely referrals to Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. The case will still be referred to Social Care even if it is against the pupil’s wishes.

**Child Sexual Exploitation (CSE)**

CSE involves exploitative situations, contexts and relationships where young people receive something, for example food, drugs, alcohol, gifts or in some cases simply affection as a result of engaging in sexual activities.

Sexual exploitation can take many forms from the seemingly ‘consensual’ relationship to serious organized crime involving gangs and groups.

Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyberbullying and grooming.

It is important to recognize that some young people who are being sexually exploited do not show any external signs of this abuse and may not recognise it as abuse.

Young people who go missing can be at increased risk of sexual exploitation and so procedures are in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

Schools will complete the LSCB CSE Risk Assessment Tool and refer to the multi-agency referral unit if there is a concern that a young person may be at risk.

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

**The new definition should be noted:**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

• Acquisition of money, clothes, mobile phones, etc. without plausible explanation;

• Gang-association and/or isolation from peers/social networks;

• Exclusion or unexplained absences from school, college or work;

• Leaving home/care without explanation and persistently going missing or returning late;

• Excessive receipt of texts/phone calls;

• Returning home under the influence of drugs/alcohol;

• Inappropriate sexualised behaviour for age/sexually transmitted infections;

• Evidence of/suspicions of physical or sexual assault;

• Relationships with controlling or significantly older individuals or groups;

• Multiple callers (unknown adults or peers);

• Frequenting areas known for sex work;

• Concerning use of internet or other social media;

• Increasing secretiveness around behaviours; and

• Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

• Having a prior experience of neglect, physical and/or sexual abuse;

• Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);

• Recent bereavement or loss;

• Social isolation or social difficulties;

• Absence of a safe environment to explore sexuality;

• Economic vulnerability;

• Homelessness or insecure accommodation status;

• Connections with other children and young people who are being sexually exploited;

• Family members or other connections involved in adult sex work;

• Having a physical or learning disability;

• Being in care (particularly those in residential care and those with interrupted care histories); and

• Sexual identity

**‘Honour based’ violence**

So-called ‘honour-based’ violence (HBV) encompasses 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.

All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead as a matter of urgency. 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 HBV, or having suffered HBV.

**Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Whitehall School pays attention to The Forced Marriage Unit which has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or: email: fmu@fco.gov.uk.

**Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of 18 transporting drugs and a referral to the National Referral Mechanism11 should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

• can affect any child or young person (male or female) under the age of 18 years;

• can affect any vulnerable adult over the age of 18 years;

• can still be exploitation even if the activity appears consensual;

• can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;

• can be perpetrated by individuals or groups, males or females, and young people or adults; and

• is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**Sexual Violence & Sexual Harassment**

Whitehall School is aware that the department of education has published detailed advice to support schools and colleges in ‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’.

What is meant by sexual violence and sexual harassment?

• Sexual violence and sexual harassment can be between two children, or a group of children.

• Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment.

• Children with SEND are likely to be more vulnerable.

• Sexual violence refers to rape, assault by penetration or sexual assault.

• Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (Note - this list is not exhaustive).

• Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent.

• When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered.

Whitehall School’s legal responsibilities:

• Whitehall School has regard for statutory guidance: Keeping Children Safe in Education (KCSIE) and Working Together (WT).

• Whitehall School has a behaviour policy and measures in place to prevent bullying and also adheres to the Human Rights Act and the Equality Act.

Responding to reports of sexual violence and sexual harassment:

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre- planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. Ultimately, any decisions are for the school to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required.

The immediate response to a report:

At Whitehall School, our initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

As per Part one of KCSIE (2019), all staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. Effective safeguarding practice includes:

* not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children’s social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
* recognising a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
* listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
* considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
* only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
* where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.
* if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Risk Assessment:

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

* the victim, especially their protection and support;
* the alleged perpetrator; and
* all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will ensure they are engaging with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

Action following a report of sexual violence and/or sexual harassment

Whitehall School will carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead is the most appropriate person to advise on the school’s initial response. Important considerations will include:

* the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
* the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
* the ages of the children involved;
* the developmental stages of the children involved;
* any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
* if the alleged incident is a one-off or a sustained pattern of abuse;
* are there ongoing risks to the victim, other children, adult students or school staff

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as ‘banter’, ‘part of growing

Early help:

Early help means providing support as soon as a problem emerges, at any point in a child’s life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referrals to Children’s Social Care:

Where a child has been harmed, is at risk of harm, or is in immediate danger, Whitehall School will make a referral to local children’s social care.

Reporting to the Police:

Any report to the police will generally be in parallel with a referral to children’s social well as potentially posing a risk of harm to other children. Harmful sexual behaviours

**The Prevent Duty**

Whitehall School is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA 2015”), in the exercise of its functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015.

The statutory “Revised Prevent duty guidance: for England and Wales” (for schools) summarises the requirements on schools in terms of four general themes:

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools to have distinct policies on implementing the Prevent duty. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

“Terrorism” for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act). 56

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school’s core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism:

Early indicators of radicalisation or extremism may include:

showing sympathy for extremist causes

glorifying violence, especially to other faiths or cultures

making remarks or comments about being at extremist events or rallies outside school

evidence of possessing illegal or extremist literature

advocating messages similar to illegal organisations or other extremist groups

out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

secretive behaviour

online searches or sharing extremist messages or social profiles

intolerance of difference, including faith, culture, gender, race or sexuality

graffiti, art work or writing that displays extremist themes

attempts to impose extremist views or practices on others

verbalising anti-Western or anti-British views

advocating violence towards others

Referral to the Channel Programme:

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.

**Children missing from Education**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

Whitehall School has at least 2 telephone numbers in each child’s emergency contact folder.

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school’s or college’s procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Whitehall School has an Admissions Register and attendance register. We will inform the local authority of any pupil who is going to be removed from the admission register where the pupil:

* has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
* has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
* has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
* are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period;

or,

* has been permanently excluded.

**Whitehall School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school’s permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.**

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2019) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
	1. leave school to be home educated
	2. move away from the school’s location
	3. remain medically unfit beyond compulsory school age
	4. are in custody for four months or more (and will not return to school afterwards); or
	5. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil’s new school and their expected start date.

**Online safety**

The opportunities offered by the Internet and other technologies must be balanced with the need for pupils and staff to keep themselves safe and deal sensibly with associated risks. See the ICT and Acceptable use of ICT Policy. The School’s ICT and PSHE curriculum will include Internet Safety.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

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

* content: being exposed to illegal, inappropriate or harmful material
* contact: being subjected to harmful online interaction with other users

• conduct: personal online behaviour that increases the likelihood of, or causes, harm

**Online Filters and monitoring**

At Whitehall School we have a clear acceptable use policy on the use of mobile technology in school and this is signed by all staff. We use Windows 10 child security on Laptops and F-secure on Ipads to limit children’s exposure to the above risks from the school IT system but also ensure an educational approach to keeping children safe on the internet as we are aware that outside of school they may have unrestricted access. Children are made aware of the dangers of the internet and encouraged to use it wisely and to speak to an adult if they are unsure of anything they find.

Children are not allowed to bring their own devices to school and if they do they are locked in the cupboard in the School Office until they go home.

**Online Safety: Staff training**

Information and support

www.thinkuknow.co.uk

www.disrespectnobody.co.uk

www.saferinternet.org.uk

www.internetmatters.org

www.pshe-association.org.uk

www.educateagainsthate.com

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

**Mobile Phones**

The school allows staff to bring in personal mobile telephones and devices which must be stored out of sight. Under no circumstances does the school allow a member of staff to contact a current pupil or parent/carer using their personal device or make or receive personal calls or texts within the Nursery, EYFS or main school. No staff members are to use their personal mobile phones to take photos of the children. No child must bring to school a mobile phone. Please see our separate mobile phone policy which recognises that personal mobile phones have the potential to be used inappropriately and so the school has developed a policy to outline the required protocol for all staff, students, volunteers and parents/carers.

**Private Fostering & Host Families**

In cases where a host family is found for a child by the school, this arrangement could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered

Whitehall School does not make private fostering agreements but if it were to make a private fostering arrangement, it could be the regulated activity provider for the purposes of the Safeguarding Vulnerable Groups Act 2006. A regulated activity provider will be committing an offence if they allow a person to carry out a regulated activity whilst barred and they know or have reason to believe that the person was barred. Where the school is the regulated activity provider, it will request a DBS enhanced check. However, where the parents make the arrangements themselves, this will be a private matter between the child’s parents and the host parents and in these circumstances the school will not be the regulated activity provider.

**Home Stays**

Whitehall School does not arrange Home Stays for children.

**Extended School, Before & After Activities (on or off site)**

As the school provides extended school facilities directly under the supervision of the school staff, the school’s arrangements for child protection as written in this policy, shall apply. Where services or activities are provided separately by another body, either on or off school site, the governing body will seek assurance that the body has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the school on these matters, where appropriate.

1. **Preventing unsuitable people from working with children**

Whitehall School will operate safer recruitment practices, ensuring DBS and reference checks are undertaken according to the government document ‘Safeguarding Children and Safer Recruitment in Education’ (2014) and KCSIE and the Local Authority’s Safer Employment Policy. Safer recruitment procedures at Whitehall School are fully compliant with the Independent Schools Inspectorate regulatory requirements as they are updated.

Assurance will always be obtained by Whitehall School that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school’s pupils on another site (for example in a separate institution).

Whitehall School’s Safer Recruitment Policy should be read in conjunction with this policy.

Whitehall School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). We will also notify Ofsted of the action taken in respect of the allegations. These notifications will be made as soon as reasonably practicable but at the latest within 14 days of the allegations being made.

**Related policies**

This Policy must be read in conjunction with the following policies:

* Anti-bullying
* Security & Supervision
* Intimate Care
* Equal Opportunities
* Acceptable use of Internet (see ICT Policy)
* Mobile Phone, Photo & Video Policy
* Educational Visits
* PSHE
* Extra-curricular Activities & Clubs
* SEN
* Teachers Code of Conduct Policy
* Safer Recruitment Policy
* Health & Safety Policy
* Behaviour Policy
* Complaints Procedure Policy
* Whistleblowing Policy

We expect staff and volunteers to protect children both within the school environment and away from school when undertaking extra-curricular activities, trips and visits. For after-school activities directly under the supervision of staff, the school’s arrangements for child protection as written in this policy shall apply. Where activities or services are provided separately by another body, the school will seek assurance that the body concerned has appropriate policies and procedures in place for child protection.

**Monitoring and Review**

The implementation of a suitable monitoring system is the responsibility of the Principal who is also a Proprietor. Whitehall School’s monitoring procedures aim to ensure full compliance with the policy at all stages. This policy will be reviewed annually, including an update of procedures and their implementation. This review should be carried out in consultation with the Proprietors who will ensure that the school contributes to inter-agency working through effective communication and good cooperation. Minutes of Board meetings should be detailed to show this work.

If there has been a substantiated allegation against a member of staff, the school should work with the LADO to determine whether there are any improvements to be made to the school or college’s procedures or practice to help prevent similar events in the future.

*Last Review: September 2019*

***Next review: September 2020***

**Appendix A**

**Identifying cases of abuse**

Types of Abuse and Neglect can be found in ‘Keeping Children Safe in Education (2018)’ (Annex A):

At Whitehall School, staff are 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. There are four types of abuse as seen below.

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 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 48).

**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.

**Appendix B**

**Useful contacts**

Education Child Protection Service Advice Line Tel: 01223 703800

Cambridgeshire Direct Contact Centre (Social Care) Tel: 0345 045 5203

Emergency Duty Team (out of hours) Tel: 01733 234724

Police Child Abuse Investigation Unit Tel: 01480 847743

The LADO is: Janet Farr Tel: 01223 727968

The Cambridgeshire LADO Unit: Tel: 01223 727967

The DBS: Tel: 0870 9090811

DBS, PO Box 110, Liverpool. L69 3JD

Local Police Force: 101

DfE Helpline: 0207 340 7264

Counter Extremism Email: counter-extremism@education.gsi.gov.uk

Information from Cambridgeshire Local Safeguarding Partnerships, including Core Inter-Agency Procedures, can be obtained from [www.cambslscb.org.uk](http://www.cambslscb.org.uk)