



Safeguarding and Child Protection Policy

STATUS: STATUTORY

Review Cycle: Annual

Governors Committee Responsible: FGB

Date of Last Review: 14 October 2025

Date of Next Review: Autumn 2026

Tiffin School's Safeguarding and Child Protection Policy is based upon
the model Kingston and Richmond AfC policy 2025



FAIRE SANS DIRE

Contents

1. Policy principles and aims	3
2. Terminology	4
3. Key personnel	5
Children's services	6
Achieving for Children (AfC) single point of access (SPA)	6
Local authority designated officer (LADO)	6
4. The Law and Statutory guidance	7
5. Roles and responsibilities	8
6. Safe recruitment, safe school and safe staff	14
Filtering and Monitoring	15
Generative Artificial Intelligence	16
Information security and access systems	16
Media recordings, audio, image and video (including digital files)	16
7. Safeguarding Training	17
8. Teaching and Learning	17
9. Children potentially at greater risk of harm	18
Children who have a social worker	19
Children Looked After and previously looked after	19
Children with special educational needs, disabilities and health issues	20
Children who are lesbian, gay, bisexual, transgender or gender questioning	20
10. Identified areas of particular risk for our school	20
11. Early help	21
12. What to do if staff are concerned about a child's welfare	22
13. What to do if a student discloses to a member of staff	23
14. Making a referral to the Single Point of Access (SPA)/Children's Services	24
15. Support for staff	25
16. Confidentiality	25
17. Notifying parents or carers	26
18. Record Keeping	26
19. Allegations against Staff (including low-level concerns) policy	26
Low level concerns	33
20. Whistleblowing	34
21. Physical intervention	35
Linked policies	35
Appendix 1: Types of abuse and specific safeguarding concerns	
a. recognising abuse	37
b. Physical abuse	37
c. Emotional abuse	37
d. Sexual abuse	37
e. Neglect	38
f. Indicators of abuse	38
Impact of abuse	39
g. Taking action	39

h. Mental health	39
i. Drugs and alcohol	40
j. Domestic abuse	41
k. Homelessness	41
l. Children with family members in prison	42
m. Contextual safeguarding and exploitation	42
n. Children absent from education	42
o. Children who run away or go missing from education, home or care	43
p. Child sexual exploitation (CSE)	43
q. Child criminal exploitation (CCE)	46
r. County lines	47
s. Serious youth violence	47
t. School-related weapons incidents	48
u. Child on child abuse	48
v. Bullying	49
w. Sexual violence and sexual harassment	49
x. Harmful sexual behaviours:	51
z. Upskirting	54
aa. Sharing nudes and semi-nudes	54
bb. Cybercrime	57
cc. Online safety	58
The 4Cs	58
dd. So-called 'honour based' abuse	59
ee. Female genital mutilation (FGM)	59
Teachers	60
Other members of staff	60
ff. Forced marriage	60
gg. Child trafficking and modern slavery	61
hh. Private fostering	62
ii. Preventing radicalisation and extremism	62
jj. Child abuse linked to faith or belief	64
kk. Suicide and self-harm	64
ll. Fabricated or induced illnesses	66
Concern reporting form	66
Appendix 3: Body map	70
Appendix 4: Links	74
Appendix 5: The Seven Rs	78
Appendix 6: LLC form	79

1. Policy principles and aims

This policy aims to demonstrate to students, parents and other partners, Tiffin School's commitment to safeguarding and child protection.

The welfare of our children is paramount. All children, regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities. We recognise that all adults in our school have a full and active part to play in protecting our students from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.

Our school is committed to providing an environment in which children and young people feel safe, secure, valued and respected and which promotes their social, physical and moral development. Children in our school feel confident to, and know how to approach adults if they are in difficulties.

This policy is used in conjunction with staff training and continued professional development to:

1. raise staff awareness of the need to safeguard children and their responsibilities in identifying and reporting possible cases of abuse
2. provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children
3. emphasise the need for good levels of communication between all members of staff and develop and promote effective working relationships with other agencies, especially Achieving for Children (AfC) and the police
4. develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse; ensure that the structured procedure is followed by school staff in cases of suspected abuse
5. Ensure our staff are all trained to recognise the signs of abuse and understand their responsibilities and how they should respond when they identify a concern
6. Ensure we keep track of children known or thought to be at risk of harm

We take seriously our responsibility to ensure that we have appropriate procedures in place for responding to situations in which we believe that a child has been abused or is at risk of abuse. Our procedures also cover circumstances in which a member of staff is accused of, or suspected of, abuse. We will take steps to ensure that any groups or individuals who hire and/or use our building or grounds inside or outside of school hours, follow the local child protection guidelines and are aware of their safeguarding duties.

We will ensure that all staff read and understand:

- Tiffin School's safeguarding and child protection policy
- Tiffin School's Online Safety policy
- Keeping Children Safe in Education [Part One] and school leaders and staff that work directly with children will also read Annex A and B
- Tiffin School's Staff Code of Conduct
- Tiffin's Behaviour Policy

We will ensure that all staff are aware of:

- The safeguarding response to children who go missing from education

- The role of the Designated Safeguarding Lead and their Deputies
- The identity of Tiffin School's Designated Safeguarding Lead and Deputies
- The additional vulnerabilities of children who are looked after/previously looked after, children with Special Educational Needs and Disabilities, children who are young carers and LGBTQ+ children
- The Attendance Policy

Copies of the above documents will be provided to all staff as part of the induction process.

Tiffin will publish our Safeguarding and Child Protection policy on our website and hard copies will be available on request from the school office.

The roles of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead(s) will be explicit in their job descriptions and we will ensure that they have the time and resources to fulfil their duties.

As a result of local learning, including around the website 'Everyone's Invited' in March 2021, the School has a culture of prevention and education in order to raise responsible, caring adults. The School encourages respectful behaviour and language to be used to all; a restorative approach to incidents of concern; and a wish to make reasonable adjustments to encourage students to remain in education, despite any difficulties. There is no tolerance of discriminatory language or abuse towards staff or students.

2. Terminology

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

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

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

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity, excluding governors.

Child includes everyone under the age of 18.

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

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

The local safeguarding children partnership has three safeguarding partners:

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

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

3. Key personnel

<p style="text-align: center;">Designated Safeguarding Lead (DSL)</p> <p style="text-align: center;">Helen O’Sullivan Deputy Headteacher hosullivan@tiffin.kingston.sch.uk</p>	<p style="text-align: center;">Designated Deputy Safeguarding Leads</p> <p style="text-align: center;">Alice Stone Safeguarding Manager astone@tiffin.kingston.sch.uk</p> <p style="text-align: center;">Robin Shaw Deputy Designated Safeguarding Lead rshaw@tiffin.kingston.sch.uk</p> <p style="text-align: center;">Lucy Hughes Deputy Head of 6th Form lhughes@tiffin.kingston.sch.uk</p>
<p style="text-align: center;">Chair of Governors</p> <p style="text-align: center;">Phil Phillips</p>	<p style="text-align: center;">Safeguarding Link Governors</p> <p style="text-align: center;">Anna Jones & Hoi-Yee Roper</p>
<p style="text-align: center;">Designated Teacher for Children Looked After and for Young Carers</p> <p style="text-align: center;">Helen O’Sullivan Deputy Headteacher hosullivan@tiffin.kingston.sch.uk</p>	<p style="text-align: center;">Special educational needs and disabilities coordinator (SENDCo)</p> <p style="text-align: center;">Rachel Dyer (SENCo) rdyer@tiffin.kingston.sch.uk</p> <p style="text-align: center;">Harry Bradley (Deputy SENCo Key Stage 3) hbradley@tiffin.kingston.sch.uk</p> <p style="text-align: center;">Matilda Underwood (Deputy SENCo Therapy) munderwood@tiffin.kingston.sch.uk</p>

Children's services

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

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

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

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

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

If a child needs support in other boroughs, this government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](#)

Local authority designated officer (LADO)

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

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: [LADO referral form](#)'

Local Authority (contacts according to the home address)

Kingston and Richmond

Children's specialist services can be contacted via the Single Point of Access (SPA) Team: 0208 8547 5008 from 8am to 6pm, and other times via the out of hours duty social worker. SPA can be contacted on the [Single Point of Access \(SPA\)](#) website.

OUT OF HOURS: 020-8770 5000

Kingston LADO Service: 07774 332675 lado@achievingforchildren.org.uk
<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/resources-for-children-parents-and-carers/allegations-against-an-adult-working-or-volunteering-with-children/>

Ealing LADO:

<https://www.ealingfamiliesdirectory.org.uk/kb5/ealing/directory/advice.page?id=hE9cspkwc&escb=true>

Merton LADO:

<https://www.mertonscp.org.uk/working-with-children/managing-allegations-against-adults-who-work-with-children-lado/>

Surrey LADO

<https://surreyscp.org.uk/professionals/dealing-with-allegations-against-people-working-with-children/>

Hounslow Safeguarding and LADO: https://www.hounslow.gov.uk/info/20075/child_protection

Schools Link Police Officer Kingston and Richmond Police

rebecca.soole@met.police.uk

101 (999 if immediate risk of harm)

4. The Law and Statutory guidance

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

[Keeping Children Safe in Education 2025](#) from now on referred to as KCSIE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

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

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

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

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

[The Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention)

that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

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

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

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

5. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities

The Governing Board

The non-statutory Academy trust governance guide sets out the roles, responsibilities and legal duties for governing boards and boards of trustees. The Governing Board of Tiffin School understands and fulfils its responsibilities, namely to ensure that:

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding children partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- The school submits the safeguarding self-audit to the local safeguarding children partnership annually.
- Safeguarding is a standing item on the agenda for every meeting of the full Board.
- They liaise with the Headteacher and/or designated teachers over safeguarding matters. This is a strategic role rather than operational. Governors will not be involved in concerns regarding individual children
- There is a Safeguarding and Child Protection policy that reflects the whole school approach to peer-on-peer abuse in conjunction with the Student Behaviour Policy.

- There is a Staff Code of Conduct that complements this policy and the two should be read in conjunction with each other
- Safeguarding and child protection, managing allegations policy and procedures, including the Staff Behaviour Policy (Code of Conduct), are consistent with KRSCP (Kingston and Richmond Safeguarding Children Partnership) and statutory requirements. They are reviewed when needed and annually as a minimum. The Safeguarding and Child Protection policy is publicly available on the school website
- All staff, confirm that they have read, understood and agree to work within Tiffin School's Safeguarding and Child Protection policy and Staff Code of Conduct
- All staff confirm that they have read and understood Keeping Children Safe in Education (2025) part 1 and Annex A and B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance
- All Governors confirm that they have read and understood Keeping Children Safe in Education parts one and two. Governors involved in recruitment will also read part 3 KCSIE. Safeguarding governors, and the Chair of governors will read all of KCSIE.
- The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and ensures that there is at least one person on every recruitment panel who has completed safer recruitment training within the last three years
- Tiffin School has procedures for dealing with allegations of abuse against staff (including the headteacher), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned
- The Governing Board has at least one nominated governor, called the safeguarding link governor, responsible for safeguarding who has undertaken appropriate Local Authority recommended training for Governors for the role. The chair of governors is responsible in the event of an allegation of abuse made against the headteacher
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect affecting students with special educational needs and disabilities (SEND).
- Child protection files are maintained as set out in Annex C of KCSiE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- An annual audit of Tiffin School's safeguarding policies, procedures and practices is undertaken with the Headteacher and designated safeguarding lead (DSL) and that this is reported to the Board and submitted to KRSCP
- Tiffin School is aware of relevant legislation and local guidance, which has been agreed through the local safeguarding children partnership arrangements
- There are clear lines of accountability for safeguarding within the school's leadership
- A member of the senior leadership team has been appointed as the designated safeguarding lead and they will take lead responsibility for safeguarding and child protection; the role is explicit in the role holder's job description
- DSLs and their deputy(ies) undertake multi-agency (Level 3) safeguarding training which is updated every two years

- All members of SLT complete Level 2 Safeguarding training every 2 years
- There is a designated teacher to promote the educational achievement of children looked after who are on the school roll
- All members of the Governing Board receive safeguarding training at induction which is regularly updated (3 yearly). The safeguarding Governors attend appropriate training that guides governors in their strategic responsibilities to provide appropriate challenge and support for any action and to progress areas of weakness or development in the School's safeguarding arrangement
- At least one member of the Governing Board has completed safer recruitment training to be repeated every five years
- All staff receive regular safeguarding information, updates and training.
- Staff read the appropriate part of KCSIE
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through Personal, Social, Health and Economic education (PSHE) and through relationships education or Relationships and Sex Education (RSE)
- Appropriate safeguarding responses are in place for children absent from education and who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future
- Appropriate online filtering and monitoring systems are in place and their effectiveness is regularly reviewed.
- Enhanced Disclosure and Barring Service (DBS) checks (without barred list checks, unless the Governor is also a volunteer at the school) are in place for all Governors
- There are effective safeguarding arrangements for when the site is being hired/let
- All governors have read the relevant parts of KCSIE and this policy

The Safeguarding link governors are Anna Jones and Hoi-Yee Roper

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

The Headteacher

The Headteacher will ensure that:

- The Safeguarding and Child Protection Policy and related policies and procedures are implemented and followed by all staff

- Staff receive regular safeguarding training
- Parents/carers are aware of where they can find this policy
- Sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) to carry out their roles effectively
- Visitors are appropriately supervised or escorted, where necessary
- Systems are in place for children to express their views and give feedback, which operate with the best interests of the child at heart
- They become the “case manager” when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing/managing allegations against staff procedures
- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online. The PSHE curriculum is reviewed regularly to ensure that it remains relevant and current
- Behaviour expectations around the whole school site will be consistent with the safeguarding and relationship lessons taught in the classroom
- They liaise with the Local Authority Designated Officer (LADO) within 24 hours before taking any action, and then on an ongoing basis, where an allegation is made against a member of staff or a volunteer.
- They undertake multi-agency (Level 3) safeguarding training with updates every two years

The Designated Safeguarding Lead (DSL) - Mrs H O’Sullivan (Deputy Headteacher)

- Is a member of the senior leadership team and holds lead responsibility for safeguarding and child protection in Tiffin School. This responsibility will not be delegated. Tiffin has deputy DSLs to support the DSL in their role.
- The DSL and DDSLs will have the responsibilities of the DSL and DDSL listed in their job descriptions

The DSL will:

- Read and follow KCSIE
- Be available during school hours for staff to discuss safeguarding concerns and acts as a source of support and expertise for the whole school community in regards to our safeguarding duties
- Encourage a culture of listening to children and taking account of their wishes and feelings
- Undertake multi-agency (Level 3) safeguarding training with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually

- Undertakes Prevent awareness training
- Refer a child if there are concerns about possible abuse to AfC's Single Point of Access (SPA) and/or the local authority where the child resides and act as a focal point for staff to discuss concerns
- Keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child, even if there is no need to make an immediate referral
- Ensure that all such records are kept confidential, stored securely and are separate from the student's general file
- Ensure that an indication of the existence of the additional safeguarding and child protection file is marked on the student general file
- Ensure that a copy of the safeguarding and child protection file is retained until such time that the new school acknowledges receipt of the original file. The copy will then be shredded
- Liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children
- Have a working knowledge of KRSCP and AfC procedures; and will ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments and provide a report, where required, which has been shared with the parents and child (depending on age and understanding)
- Notify Children's Social Care if a child subject to a child protection plan is absent from school without explanation
- Ensure that all staff, including those who join mid year, confirm via an electronic form that they have read, understood and agree to work within Tiffin School's Safeguarding and Child Protection Policy, Staff Behaviour Policy (Code of Conduct) and Keeping Children Safe in Education Part 1 and Annex A and B and ensure that the policies are used appropriately
- Organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences
- Undertake, with the Headteacher and Governing Board, an annual audit of Tiffin School's safeguarding policies, procedures and practices and ensure that this is submitted to Kingston and Richmond Safeguarding Children Partnership
- Uphold a close relationship with the Kingston and Richmond Safeguarding Children Partnership (KRSCP), such as through attendance KRSCP termly Designated Safeguarding Lead forums
- Have an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation
- Help to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff
- Ensure that the name of the Designated Safeguarding Lead and Deputies are clearly advertised in the school and on the website, with a statement explaining the school's role in referring and monitoring cases of suspected abuse

- Ensure that they, or a Deputy, are available during term time school hours for staff to discuss any safeguarding concerns
- Ensure that there are adequate and appropriate cover arrangements for any out of hours or out of term activities i.e. training in when to call the LA/Single Point of Access, police etc.
- Liaise with the Headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#). The DSL is responsible for ensuring all staff are aware of this requirement.

This list is not exhaustive: please see Annex C of Keeping Children Safe in Education 2024

A Deputy Designated Safeguarding Lead

- Is trained to the same standard as the Designated Safeguarding Lead and, in support of the DSL, carries out those functions above necessary to ensure the ongoing safety and protection of students.
- In the event of the long-term absence of the DSL the Deputy will assume all of the functions above.
- Mr R Shaw is the DDSL with responsibility for Key stage 3&4
- Miss L Hughes is the DDSL with responsibility for Key stage 5
- Miss A Stone is the Safeguarding Manager across KS3-5
- Mr A Marley is a DDSL supporting KS3 and KS4
- Mr H Hameed is a DDSL supporting KS5

IT provider

- Maintains the filtering and monitoring systems
- Provides filtering and monitoring reports
- Completes actions following concerns or checks to the system

All school staff and volunteers

- Understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action.
- Undertake safeguarding and health and safety training appropriate to their role and are familiar with the suite of safeguarding policies including the Safeguarding and Child Protection Policy and Staff Code of Conduct.
- Confirm that they have received annual safeguarding training and read the relevant parts of KCSIE
- Will follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when unsure.
- Consider, at all times, what is in the best interests of the child.
- Know how to respond to a student who discloses abuse.
- Will refer any safeguarding or child protection concerns to the Designated Safeguarding Lead or if necessary where the child is at immediate risk, to the police or Single Point of Access (SPA), or if a child lives out of borough, to the relevant local authority.

- Staff will know how to use “Incident” recording/reporting on CPOMS or alternatively, how to contact the DSL or DDSLs to report a concern. This is ensured at induction and after the annual safeguarding staff training.
- Volunteers will know the DSL’s to email/contact, as they will not have a CPOMS account.
- Will provide a safe environment in which children can learn.
- Will make sure children who identify as lesbian, gay, bisexual or transgender have a safe person in that member of staff to share their concerns
- In line with the staff code of conduct:
 - Staff must not be under the influence of alcohol or any other substance which may impair their ability to perform their duties, whilst in school or having responsibility for the care of students on a school authorised activity. As the primary concern on any school trip is the students, the following rules regarding alcohol must be followed.
 - There must be no alcohol consumed on day trips.
 - On residential trips, depending on the gender composition of the students on the trip, at least one male member of staff and one female member of staff each day must abstain from drinking alcohol and be on duty; others must be ready to act in an emergency and be aware of their duty period on any rota.
 - If driving students, e.g. in a minibus, staff must refrain from drinking alcohol in the 12 hour period before driving. Whether driving in the UK or abroad, all local laws related to driving and alcohol or drugs must be followed.
 - If none of the above apply, those who wish to drink alcohol should keep within the legal limit for driving in England at all times.
 - Staff must not use or be under the influence of illegal drugs. Anyone found in possession of illegal substances whilst at work may be dismissed. Where concern is raised that a member of staff is using illegal drugs outside of work, the school may refer to the LADO.

6. Safe recruitment, safe school and safe staff

We will ensure that:

- at least one member of every recruitment panel has completed safer recruitment training within the last three years
- safer recruitment practices are adhered to including appropriate DBS checks, reference checks and any additional checks relevant to the role undertaken.
- all staff are aware of the need for maintaining appropriate and professional boundaries in their relationship with staff, students and parents and adhere to Tiffin School’s Staff Code of Conduct
- our lettings policy will seek to ensure the suitability of adults working with children on School sites at any time and that arrangements have appropriate child protection and safeguarding policies regardless of whether or not the children attending are on the school roll
- adequate risk assessments are in place including for off-site activities, after school clubs, residential trips.
- any disciplinary proceedings against staff related to child protection matters are concluded in full in accordance with Government guidance Keeping Children Safe in Education and Kingston and Richmond Safeguarding Children Partnership, LADO and HR policy, procedures and guidance
- staff are fully aware of how to and have the confidence to report misconduct
- all staff receive information about Tiffin School’s safeguarding arrangements including use of CPOMS, staff code of conduct, safeguarding and child protection policy, the role and names of the designated safeguarding lead and their deputy(ies), and Keeping Children Safe in Education on induction

- all staff receive safeguarding and child protection training at induction which is regularly updated. In addition, they receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually
- all members of staff are trained in and receive regular updates in online safety and reporting concerns
- all staff and governors have regular safeguarding awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse
- the Safeguarding and Child Protection Policy is made available via our School website and all parents and carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding and Child Protection Policy
- Tiffin School provides a co-ordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans
- the names of the Designated Safeguarding Lead and Deputy(ies), are clearly advertised in the School with a statement explaining the Tiffin School's role in referring and monitoring cases of suspected abuse
- all staff will be given a copy of Keeping Children Safe in Education and will confirm they have read and understood Part 1 and Annex A and B. Similarly the Governing Board will be given a copy and confirm they have read at least parts 1 & 2

Extended school and off-site arrangements

- Where extended school activities are provided by and managed by the School, our own safeguarding and child protection policy and procedures apply.
- If other organisations provide services or activities on our site, we will ensure that they have appropriate procedures in place, including safer recruitment procedures.
- When our students attend off-site activities, we will ensure that effective child protection arrangements are in place.
- When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform on our own staff.
- We follow the [statutory guidance for alternative provision](#) and [Achieving for Children's alternative provision policy](#). The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk, and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement where safeguarding concerns arise and reserve the right to terminate the arrangement if concerns are not adequately addressed.
- Where a parent/carer has expressed their intention to remove a child from our School with a view to educating at home, we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant where a child has SEND, is vulnerable, and/or has a social worker.
- Where our students stay with host families abroad (for example, as part of a language exchange) the School will complete the available local safeguarding checks, and be compliant with the laws and regulations in force in the host jurisdiction. Parents will be informed of the extent of these checks to enable them to make a decision about whether their child should participate.

Filtering and Monitoring

To limit children's exposure to risk from Tiffin's IT systems, we have strong and effective filtering and monitoring systems on the school's network and devices, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will make sure that

- a. specific staff have assigned roles and responsibilities to manage systems
- b. staff know about the systems in place and how to escalate concerns
- c. there are annual reviews of the systems, or more frequently if there is a significant change or issue
- d. Our governors discuss the systems with the DSL, IT staff and service providers, to gain assurance and to find out what more can be done to keep children safe
- e. the systems are effective for the age range of children and consider children potentially at greater risk of harm
- f. when we block online content, it does not impact on teaching and learning
- g. filtering works across all devices including mobile phones and smart technology

Generative Artificial Intelligence

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

Information security and access systems

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

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

The vast majority of people who take or view images or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect students, we will:

- seek their consent and parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- ensure that students are appropriately dressed
- encourage students to tell us if they are worried about any photographs that are taken of them
- ensure that students do not take photographs or video images of other students without their express permission and the permission of a member of staff

Staff are permitted to make media recordings to support educational aims but must follow our Staff Code of Conduct policy in respect of sharing, distribution and publication.

The Code of Conduct reads that Staff must:

- Only publish images of students where they and their parent/carer have given consent to do so.
- Only take images where the student is happy for them to do so.
- Only retain images when there is a clear and agreed purpose for doing so.
- Store images in an appropriate secure place in the school or setting.
- Be able to justify images of students in their possession.
- Not take images of students for personal use.
- Not take images of children which could be considered as indecent or sexual.

7. Safeguarding Training

- All Staff members and volunteers will receive appropriate safeguarding and child protection training, including online safety, at inductions and is regularly updated. This includes training on how to recognise signs of abuse, neglect and exploitation and how to respond to any concerns. In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Staff also receive regular online safety training.
- All DDSL staff receive biennial Safeguarding training from the borough/AfC.
- All staff joining the school and all volunteers will receive Safeguarding training from the DSL or DDSL or via online provision, and be shown the School's Safeguarding and Child Protection Policies and procedures, including CPOMS logins.
- All staff will complete an audit that they have received a Safeguarding induction from the DDSL and that they have read, understood and agree to work within Tiffin School's Safeguarding and Child Protection Policy, Staff Code of Conduct and Keeping Children Safe in Education (Part 1 and Annex A and B) and ensure that the policies are used appropriately.
- The nominated safeguarding Governors undergo safeguarding training prior to or as soon as appointment to their role and at regular intervals thereafter. All Governors receive safeguarding training as part of their induction and the local expectation is that it is refreshed every three years.
- Tiffin School ensures that its DSL and DDSLs attend Designated Safeguarding Lead training and conferences to keep abreast of child protection learning and developments, at least biannually. They will attend
 - a. the level 3 multi-agency local safeguarding children partnership training within 12 weeks of starting the role and refresh every two years
 - b. Prevent Awareness and safer recruitment training and ensure they have a good understanding of harmful sexual behaviour
- Tiffin School demonstrates their engagement with the KRSCP by ensuring that its DSL and/or Deputies attend the KRSCP Designated Safeguarding Lead termly forums. The DSL and DDSLs keep abreast of child protection learning and developments through appropriate training, as well as complete Multi Agency Level 3 safeguarding training every 2 years.
- We ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contracted staff, such as catering staff, are aware of our Safeguarding and Child Protection Policy and procedure, and have received appropriate safeguarding training.

8. Teaching and Learning

Safeguarding children is at the heart of the school's pastoral programs and is delivered through curriculum subjects, 21CL (PSHE, RSE, Citizenship), assemblies, and tutor time. Tiffin school also engages with the support of external agencies in delivering a safeguarding message to our students, including the police, NHS Youth Health Link Workers, School Nurse.

Safeguarding areas covered include:

- personal safety
- who to talk to
- stranger danger
- road safety
- fire safety
- road safety
- online safety
- sexting and sharing indecent images
- bullying (including cyber bullying)
- positive relationships
- Child Sexual Exploitation and Child Criminal Exploitation
- so-called 'honour based' violence
- Female Genital Mutilation
- radicalisation and extremism
- self-esteem
- drugs and alcohol
- knife crime
- mental health

9. Children potentially at greater risk of harm

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; an individual child's personality, behaviour, disability, mental and physical health needs; and family circumstances.

Children who are lesbian, gay, bi or trans (LGBTQ+), or are perceived to be, can be targeted by other children. These children have their vulnerability compounded when there is a lack of a trusted adult they can speak to. Therefore Tiffin staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff, for example through the staff and student led LGBTQ+ Society.

To ensure that all of our students receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- asylum seekers

- looked after by the local authority or otherwise living away from home
- vulnerable to being bullied, or engaging in bullying behaviours
- living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- already perceived as a 'problem'
- at risk of child sexual exploitation (CSE)
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being radicalised into extremism
- LGBTQ+

This list provides examples of vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Children who have a social worker

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

The local authorities will share the fact that a child has a social worker with the School, and the DSL will ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This information will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

The role of the Virtual School has been extended to provide advice and support to children who are subject to a child in need plan or a child protection plan.

Children Looked After, Previously Looked After and Kinship

The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Tiffin School will ensure that staff have the necessary skills and knowledge to keep children looked after and previously looked after safe. Appropriate staff will have the information they need in relation to a Child Looked After's legal status (for example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated) and the level of authority delegated by the caring authority to the carer.

The designated teacher for Children Looked After is the DSL, Helen O’Sullivan. The designated Governor for Children Looked After is the Safeguarding Governor, Anna Jones.

The designated teacher will:

- promote a culture of high expectations and aspirations for how children looked after and previously looked after learn
- make sure the young person has a voice in setting learning targets
- be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning
- make sure that the children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home
- have lead responsibility for the development and implementation of all Children Looked After’s personal education plans (PEPs) within the School

[Role and responsibilities of the designated teacher](#)

The designated teacher has attended appropriate training and ensures that the school has the up-to-date details of the allocated social worker/personal adviser (care leavers) and the virtual school headteacher in the local authority that looks after the child. Details of the AfC Virtual School can be found at: [AfC Virtual School](#)

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

Children with special educational needs, disabilities and health issues

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

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

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

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

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

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

10. Identified areas of particular risk for our school

Tiffin School is a town centre site. This comes with a number of potential risks that are addressed through the pastoral program, assemblies, staff duties and clear streams of communication. Risks include

- Child on child abuse
- Mugging and violent crime/knife crime
- Dangers of public transport - road and rail safety
- Accessing Sport at off site playing fields
- County Lines, Drug taking and drug dealing
- Online risks
- Grooming
- Radicalisation
- FGM
- County Lines and serious violence
- Child Criminal Exploitation
- Child Sexual Exploitation

The School addresses these risks through

- the student pastoral program and through 21CL/PSHE program
- Assembly programme
- Staff CPD on signs of abuse and taking actions
- Staff presence on gate duty before and after school daily.
- School buses transport to Sport off site
- Education on safe travel and what to do via 21CL/PSHE and assemblies and tutorials.
- Communication with parents via parentmail and information evening regarding risks and safe travel.
- External speakers - police, drug agencies, NHS etc.
- On-line safety training for staff, students and parents from AfC and DSLs.
- Keeping safe on line lessons in the pastoral program and PSHE

11. Early help

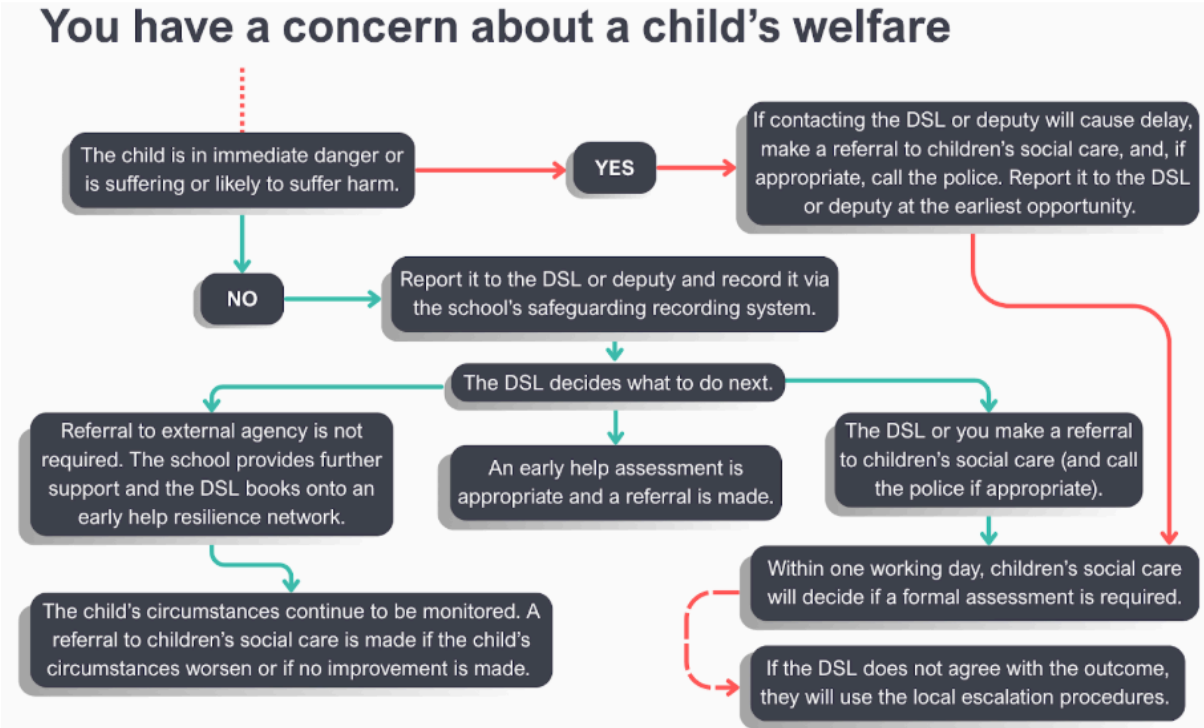
Early help is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse. We are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

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

12. What to do if staff are concerned about a child’s welfare



If staff have any concerns about a child's welfare, they should act on them immediately. Any concerns regarding indicators of abuse or neglect or signs that a child may be experiencing a safeguarding issue should be recorded on CPOMS under the "Safeguarding" category to inform the DSL or Deputy DSL. For physical signs of abuse, a body map can also be used (CPOMS version or appendix 3). Concerns can also be discussed in person with the DSL but the details of the concern should be recorded in detailed and accurate writing via CPOMS. Alongside school procedures, staff can consult *What to do if you're worried a child is being abused* government guidance

There will be occasions when staff may suspect that a student may be at risk, but have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.

Tiffin School recognises that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding. In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns to the DDSL/DSL. Following an initial conversation with the student, if the member of staff remains concerned they should discuss their concerns with the DSL and put them in writing via CPOMS. If a child is in immediate danger, the DSL or DDSL will make a referral to the police and/or children's services. In the absence of the DSL team, anyone can make a referral. Call the police on 999 or SPA through details on page 6 . If you make the referral, you will update the DSL or a deputy as soon as is practically possible.

If after referring to the DSL, a member of staff is not content with the response, they should refer it to the Headteacher, or they can refer directly to the SPA.

If the student does begin to reveal that they are being harmed, staff should follow the advice below regarding a student making a disclosure.

13. What to do if a student discloses to a member of staff

Remember the seven Rs: receive; reassure; respond; report; record; remember; review (see appendix 5 for more details).

We recognise that it takes a lot of courage for a child to disclose they are being abused. Staff must be aware that children

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

A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one. For some extra help: NSPCC Responding to a child's disclosure of abuse

During their conversation with the student staff will:

- listen to what the child has to say, allow them to speak freely and believe in what they are saying
- be careful not to express your own views or feelings
- remain calm and not overact or act shocked or disgusted – the student may stop talking if they feel they are upsetting the listener
- reassure the child that it is not their fault and that they have done the right thing in telling someone
- not be afraid of silences – staff must remember how difficult it is for the student and allow them time to talk
- take what the child is disclosing seriously
- ask open questions and avoid asking leading questions
- avoid jumping to conclusions, speculation or make accusations
- do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as: “Tell me”, “Describe” and “Explain”. Otherwise, you may invalidate your evidence (and the child’s) in any later court proceedings
- if there are injuries or marks on the child, do not examine the child intimately or take pictures
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused
- avoid admonishing the child for not disclosing sooner. Saying things such as ‘I do wish you had told me about it when it started’ may be the staff member’s way of being supportive, but may be interpreted by the child to mean they have done something wrong
- tell the child what will happen next, tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help

If a student talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on. Staff are not allowed to keep secrets. Staff will consider the impact on any siblings as well and the support they will need.

Recording the disclosure

The member of staff should write up their conversation as soon as possible on CPOMS, in the child’s own words. Staff should make this a matter of priority and it should also detail where the disclosure was made and who else was present. For physical signs of abuse, a body map can also be used (CPOMS or appendix 3). The record should be categorised as “Safeguarding” on CPOMS and written reports handed to the DSL. Do not share the disclosure with anyone else unless children’s services, the police or another relevant agency involved in the safeguarding process tells you to. Get support for yourself if you need it.

14. Making a referral to the Single Point of Access (SPA)/Children’s Services

Concerns about a student or a disclosure should be discussed with the DSL who will help decide whether a referral to the Single Point of Access is appropriate. Whenever the DSL or deputy are unsure whether the threshold for a referral has been met, they will consult with the Single Point of Access. If a referral is needed then the DSL should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn’t been made they can and should consider making a referral themselves.

The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the student.

If after a referral the student's situation does not appear to be improving the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the student's situation improves. If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral the student's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The Resolving professional differences - Kingston and Richmond Safeguarding Children Partnership procedure will be used, where necessary.

If a student is in immediate danger or is at risk of harm a referral should be made to SPA and/or the police immediately. Anybody can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If a child who has experienced sexual assault asks the School not to make a referral

If the child/young person does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care. Rape, assault by penetration and sexual assaults are crimes; where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged instigator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the person affected by the behaviour's wishes against their duty to protect them and other children.

15. Support for 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 DSLs and to seek further support as appropriate.

16. Confidentiality

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

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

The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in

schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: “The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”

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

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

17. Notifying parents or carers

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

18. Record Keeping

Students’ safeguarding and child protection records will be stored securely and access to them will be appropriately limited. Safeguarding records are held on CPOMs and access is limited to the DSLs, Headteacher and AHTs/Heads of Keystage.

When students leave Tiffin School, the School will ensure that their child protection file is transferred to the new school or college as soon as possible. This will be transferred separately from their main student file, ensuring secure transit and a confirmation of receipt will be requested and retained. Where appropriate, the DSL will share information in advance of the student transferring so support can be put in place.

If Tiffin School is the last school that the student attends, their child protection file will be securely stored by the School until their 26th birthday is reached when it will be securely disposed of.

19. Allegations against Staff (including low-level concerns) policy

Tiffin School has a whole school approach to safeguarding and we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Despite all efforts to recruit safely there may be occasions when allegations of abuse against children are reported to have been committed by staff, practitioners and/or volunteers, who work with students in our school.

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

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and the 'Guidance for safer working practice for adults who work with children and young people in education settings' Guidance for safer working practice for those working with children and young people in education settings February 2022

Guidance about conduct and safe practice, will be given at induction. This will include:

- Safe use of mobile phones by staff
- Tiffin School's Staff Code of Conduct.
- All school staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for interviews or work with individual students or parents to be conducted in view of other adults.

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

The Headteacher on all such occasions will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours and before taking any further action.

If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult the LADO as above, without notifying the headteacher first.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

If the school receives an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by police or Children's Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:

- the vulnerability of children away from home

- the higher standards of conduct demanded by law and regulation of those caring for other people's children
- the position of trust enjoyed by such people

Tiffin School will follow the London child protection procedures for managing allegations against staff
London child protection procedures: allegations and procedures set out in KCSIE

Suspension of the accused until the case is resolved

Suspension of the member of staff, against whom an allegation has been made, needs careful consideration and will not be the default position, and the Headteacher will seek the advice of the LADO and an HR consultant in making this decision. It will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. Based on the assessment of risk, all options to avoid suspension will be considered, such as

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

In the event of an allegation against the Headteacher, the decision to suspend will be made by the chair of governors in consultation with the LADO and HR.

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

If an allegation pertains to an adult not employed directly by the School, for example, cleaning staff, peripatetic teachers, sports coaches etc. the school will work directly with the employing agency and the LADO as described above.

The School will ensure that all external agencies used are provided with details of the School's process for managing information.

We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

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

There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. If a teacher is dismissed due to serious misconduct, or might have been dismissed had they not left first, consideration will be given as to whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

Definitions for outcomes of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

1. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
2. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care

6. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
7. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
8. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
9. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
10. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
11. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
12. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
13. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
14. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it
- Confidentiality and information sharing
- The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:
 - Who needs to know about the allegation and what information can be shared
 - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
 - What, if any, information can be reasonably given to the wider community to reduce speculation
 - How to manage press interest if, and when, it arises

Record-keeping

- The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
- The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
 - A clear and comprehensive summary of the allegation
 - Details of how the allegation was followed up and resolved
 - Notes of any action taken, decisions reached and the outcome
 - A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Low level concerns

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

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating students (which might include shouting at them)
- using inappropriate sexualised, intimidating or offensive language.

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

Sharing Low-Level Concerns

The culture of our School is such that staff are encouraged to pass on low level concerns to the Headteacher. These concerns will be recorded and dealt with appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Ensuring they are dealt with effectively will also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing on the low-level concerns form (Appendix 6). In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely by HR and comply with the Data Protection Act 2018 and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

20. Whistleblowing

Tiffin School has a whistleblowing policy which is available as a separate document. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

Our School works hard to encourage a culture of mutual respect and learning. We welcome comments and feedback and provide staff, students and parents with a safe mechanism to raise any concerns.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

In the first instance this should be raised with the Headteacher, the DDSL/DSL or the chair of governors. If it becomes necessary to consult outside the School, they should speak to the LADO for further guidance and support.

Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as making contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk).

Whistle-blowing issues regarding the Headteacher should be raised with the chair of the Governing Board.

21. Physical intervention

Tiffin School promotes a positive environment for all staff students, volunteers and visitors. We have a Physical Intervention Policy and Staff Code of Conduct, which is available as a separate document. We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Staff who are likely to need to use physical intervention will be appropriately trained. All incidents involving physical intervention will be recorded and signed by a witness.

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

We recognise that touch 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.

[Positive environments where children can flourish](#)

[Use of reasonable force in schools](#)

Appendix 1: Types of abuse and specific safeguarding concerns

a. Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

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

There are four categories of abuse.

b. Physical abuse

Physical abuse is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

c. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, such as in situations of domestic abuse. It may involve serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

d. Sexual abuse

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Our School is aware of the impact of the 'Everyone's Invited' website and the prevalence of harmful sexual behaviour. We encourage all students to speak out either in person or to report concerns using our anonymous reporting system.

e. Neglect

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

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

Neglect can occur in affluent families. [Engaging Neglectful Parents from Affluent Backgrounds Neglect Toolkit](https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/guidance-policies-and-procedures/threshold/)
<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/guidance-policies-and-procedures/threshold/>

f. Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits/be hungry/take food from others
- have difficulty in making or sustaining friendships
- appear fearful/anxious
- be reckless with regard to their own or others' safety
- self-harm
- low self-esteem
- frequently miss school or arrive late

- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become uninterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development
- acquire gifts such as money or a mobile phone from new ‘friends’ or adults recently acquainted with the child’s family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

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

Impact of abuse

The sustained abuse or neglect of children physically, emotionally or sexually can have long term effects on the child’s health, development and wellbeing. It is important to consider the impact on any siblings as well. It can impact significantly on a child’s self-esteem, self-image and on their perception of self and of others. The more *Adverse Childhood Experiences (ACEs) a child has, the more likely they are to suffer long term. The effects can extend into adult life and lead to difficulties in forming and sustaining positive and close relationships. In some situations, it can affect parenting ability.

[*ACEs video](#)

g. Taking action

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of ‘it could happen here’.

Key points for staff to remember when taking action are:

- in an emergency, take the action necessary to help the child, for example call 999
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete an incident report on CPOMS and/or contact the DSL/DDSL directly and seek support for yourself if you are distressed or need to debrief

h. Mental health

Tiffin has a Mental Health policy. Mental health issues affect at least 1 in 10 children and young people. They include depression, anxiety, low self-esteem, disordered eating, panic attacks, sleep problems and many other conditions and behaviours. They are often a direct response to what is happening in their lives.

Tiffin recognises that mental health issues can, in some cases, be an indicator that a child has suffered

or is at risk of suffering abuse, neglect or exploitation and is aware that only appropriately-trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health issue, or be at risk of developing one.

Possible warning signs include:

- Persistent sadness — two or more weeks
- Withdrawing from or avoiding social interactions
- Hurting oneself or talking about hurting oneself
- Talking about death or suicide
- Outbursts or extreme irritability
- Out-of-control behaviour that can be harmful
- Drastic changes in mood, behaviour or personality
- Changes in eating habits
- Loss of weight
- Difficulty sleeping
- Frequent headaches or stomach aches
- Difficulty concentrating
- Changes in academic performance
- Avoiding or missing school

Tiffin aims to promote positive mental health for all staff and students.

The DDSL Alice Stone is also the Mental Health and Wellbeing lead in the school.

Tiffin will ensure that staff, students and parents are made aware of the support available in school and in the local community. To do so, we take into account the government's [Promoting and supporting mental health and wellbeing in schools and colleges](#) guidance.

If a member of staff has a mental health concern about a child that is also a safeguarding concern, they will speak to the DSL or a deputy DDSL immediately, unless the child is in immediate danger, in which case they will call the police first.

Although staff may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy DDSL will make a referral to the Child and Adolescent Mental Health Service's (CAMHS) single point of access for Kingston and Richmond [here](#).

Useful links: [Mental health and behaviour in schools guidance](#) [NSPCC](#) [Mind](#) [Kooth](#)

i. Drugs and alcohol

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

act in line with our first aid procedures, behaviour policy and, where applicable, the [When to call the police](#) guidance.

Useful information:

[Local partnership guidance](#)

j. Domestic abuse

The [Domestic Abuse Act 2021](#) recognises the impact of domestic abuse on children, as victims in their own right if they see, hear or experience the effects of abuse.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- economic
- emotional
- controlling or coercive behaviour

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs.

Tiffin recognises that exposure to domestic abuse 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. Tiffin acknowledges that domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Tiffin School has signed up to the police initiative Operation Encompass that helps the school to provide silent support to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child's circumstances and can enable silent support to be given to the child according to their needs.

[Operation Encompass](#)

k. Homelessness

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

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

- household debt, including new poverty induced by the pandemic
- rent arrears
- domestic abuse and antisocial behaviour
- the family being asked to leave a property

If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

l. Children with family members in prison

Tiffin recognises that children who have a family member in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The School will work with agencies and

resources such as [NICCO](#) (National Information Centre on Children of Offenders) to help mitigate negative consequences for those children.

m. Contextual safeguarding and exploitation

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

The focus of contextual safeguarding and exploitation (CS&E) is implementing child safeguarding practices into community spaces to ensure that children are protected from the harm they experience outside of the family home. This focus moves beyond just assessing parenting capacity to safeguard a child at home, to assessing the impact of peer groups and community spaces (schools and neighbourhoods) on a child's safety and wellbeing outside the home.

It looks to identify the influences outside the family that can impact the parent-child relationship and the safety of a child in the community. It then adapts the child protection systems, safeguarding partnerships, and creates new professional networks with those who have an influence in the location so that the identified child, their family and the community are safe.

Tiffin will maintain records of concerns about extrafamilial harm in the same way as other concerns are recorded and in accordance with our safeguarding procedures.

Concerns relating to significant harm and extrafamilial harm will be referred by the DSL to the Single Point of Access Team; if considered appropriate, a multi-agency strategy meeting will be held to determine threshold for significant harm, as well as for the Multi Agency Pre-MACE Panel.

[Achieving for Children's Risk Outside the Home page](#)

[Contextual safeguarding](#)

[KRSCP guidance to MARVE](#)

[KRSCP threshold](#)

[Missing Protocol](#)

n. Children absent from education

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

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

Our Attendance Policy is set out in a separate document and is reviewed regularly by the Governing Board. The school follows the government's Working together to improve school attendance statutory guidance.

Useful links:

[Local partnership guidance](#)

[Children Missing Education statutory government guidance](#)

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

Tiffin recognises that children who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

The statutory guidance [Children Who Run Away or go Missing from Home or Care](#) requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with AfC or other relevant local authority, the School will facilitate return home interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place.

p. Child sexual exploitation (CSE)

Tiffin follows the London Child Protection Procedures for safeguarding children from sexual exploitation. [Safeguarding Children from Sexual Exploitation](#)

In February 2017, the government updated the working definition of child sexual exploitation [Child sexual exploitation definition and guide](#)

“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.”

Child sexual exploitation is a form of child sexual abuse affecting boys and girls. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation may occur without the child being aware of events, or understanding that these constitute abuse.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18, including 16 and 17 year olds who can legally consent to have sex
- can still be abused even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child's or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, or access to economic or other resources

Consent

Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation), consent cannot legally be given whatever the age of the child.

Key factors in child sexual exploitation

Child sexual exploitation involves some form of exchange (sexual activity in return for something) between the victim and/or perpetrator or facilitator. Where there is no such exchange, for example, where the gain for the perpetrator is sexual gratification (or the exercise of power or control), this is described as sexual abuse (and not exploitation).

The exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). The receipt of something by a child/young person does not make them any less of a victim.

It is also important to note that the prevention of something negative can also fulfil the definition of exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Links to other kinds of crime

- Child trafficking
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution

- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

Potential vulnerabilities

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 or 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)
- Sexual identity

Possible indicators of child sexual exploitation

- Acquisition of money, clothes, mobile phones etc, without plausible explanation
- Gang association and/or isolation from peers and social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home or care without explanation and persistently going missing or returning late
- Excessive receipt of texts or phone calls
- Returning home under the influence of drugs or alcohol
- Inappropriate sexualised behaviour for age or sexually transmitted infections
- Evidence of or suspicion 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
- Self-harm or significant changes in emotional wellbeing
- Online exploitation

All young people are at risk from online exploitation and can be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the transfer of images can be quickly and easily shared with others, which makes it difficult to contain the potential for further abuse.

Further information on signs of a child's involvement in sexual exploitation is available on [The Children's Society's website](#) and Home Office's [Child sexual exploitation: definition and guide for practitioners](#).

Children may be instigators of abuse

It must be recognised that children may also be instigators of abuse, sometimes at the same time as being abused themselves.

q. Child criminal exploitation (CCE)

Child criminal exploitation can happen to girls as well as boys and 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
- coerced into moving drugs or money across the country (county lines)
- forced to shoplift or pickpocket
- forced to threaten other young people
- manipulated into committing vehicle crime

Some of the following can be indicators of CCE:

- unexplained gifts or new possessions
- association with other young people involved in exploitation
- changes in emotional wellbeing
- misuse of drugs and alcohol
- regular missing episodes or frequently coming home late
- missing school or education

r. 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 forms 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, student 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.

Key to identifying potential involvement in county lines are missing episodes.

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
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. While 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.

For more information see: [Criminal exploitation of children and vulnerable adults: county lines](#)

s. Serious youth violence

Staff at Tiffin are made aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

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

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

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

https://www.londonsafeguardingchildrenprocedures.co.uk/gang_activity.html

t. School-related weapons incidents

Tiffin School follows the [AfC School Related Weapons or Potential Weapons Incidents Protocol](#). Tiffin School has a duty and a responsibility to protect and safeguard our students and staff. Tiffin School will inform SPA and the police of any incident involving a weapon or potential weapon.

Teachers have a number of legal powers, which include the power to search students without consent for a number of 'prohibited items'. These include knives and weapons; alcohol; illegal drugs and stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, cause personal injury or damage to property; and any item banned by the school rules that has been identified in these rules as an item that may be searched for [Searching, screening and confiscation](#)

Tiffin recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. Tiffin will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

u. Child on child abuse

Tiffin School has a Behaviour Policy which sets out our whole school approach to abuse.

Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. All staff are able to recognise the indicators and signs of abuse and know how to identify it and respond to reports. This can include (but is not limited to):

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse within intimate partner relationships
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

In areas where gangs are prevalent, older students may attempt to recruit younger students using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Tiffin does not tolerate any form of abuse and will not allow any such behaviour to be passed off as 'banter', 'just having a laugh' or 'part of growing up'. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is likely to be considered a safeguarding allegation against a student.

What to do:

- When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the designated safeguarding lead should be informed.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

- The DSL should contact children’s services to discuss the case. It is possible that children’s services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a children’s services referral where appropriate.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both students’ files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged student being impacted by the behaviour).
- It may be appropriate to exclude the student being complained about for a period of time according to Tiffin School’s behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school’s usual disciplinary procedures.
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. Early help may be sought from AfC’s Resilience Network meetings.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

v. Bullying

Tiffin School has an anti-bullying policy which is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms, e.g. online, racist, homophobic, gender, SEND-related bullying. We keep a record of known bullying incidents, which is shared with and analysed by the Governing Board. All staff are aware that children with SEND and/or differences or perceived differences are more susceptible to being bullied or being victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the headteacher and DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PSHE education. We have a duty to record and regularly report to the local authority incidents of recorded racism within the school.

w. Sexual violence and sexual harassment

Tiffin School follows the KCSIE advice about sexual violence and sexual harassment between children in schools and colleges, [keeping children safe in education](#).

Sexual violence and sexual harassment can occur between two students of any sex. They can also occur through a group of students sexually assaulting or sexually harassing a single student or group of students.

It is more likely that girls will be the individuals impacted by sexual violence and more likely that sexual harassment will be instigated/behaviour displayed by boys.

Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. Tiffin School will ensure that **all** individuals impacted by sexual violence are taken seriously and offered appropriate support.

Sexual violence and sexual harassment is not acceptable at Tiffin School. Behaviours such as making sexual remarks (even if they are meant as compliments), grabbing bottoms, breasts and genitalia is not 'banter' or 'having a laugh' and will never be tolerated.

Tiffin School recognises that the following students can be especially vulnerable to sexual violence and sexual harassment:

- Children with Special Educational Needs and Disabilities (SEND)
- students who are Lesbian, Gay, Bi, or Trans, Questioning (LGBTQ) or who are perceived to be LGBTQ by their peers. Staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Sexual violence:

Sexual violence refers to sexual offences under the Sexual Offences Act 2003:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent: Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment:

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- sexual 'jokes' or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (see Youth produced sexual imagery (Sexting)); unwanted sexual comments on social media; sexualised online bullying; exploitation; coercion and threats. Online sexual harassment may be stand-alone or part of a wider pattern of sexual harassment and/or sexual violence.



x. Harmful sexual behaviours:

Children’s sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Harmful sexual behaviours refers to problematic, abusive and violent sexual behaviours which are developmentally inappropriate and may cause developmental damage. For more information see [NSPCC Harmful Sexual Behaviours](#)

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. A useful tool is: [Beyond Referrals Toolkit](#)

Harmful sexual behaviours will be considered in a child protection context.

Tiffin School recognises that students displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

Tiffin School has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of school life.

The PSHE and RSE curriculum, called 21 Century Life at Tiffin, covers the following issues according to the age and stage of development of the students:

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

- that sexual violence and sexual harassment is always wrong
- addressing cultures of sexual harassment
- consent

Useful information:

[Local partnership guidance](#)

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

[NSPCC Harmful Sexual Behaviours](#)

[Stop it Now](#)

y. Responding to allegations of sexual harassment and sexual violence

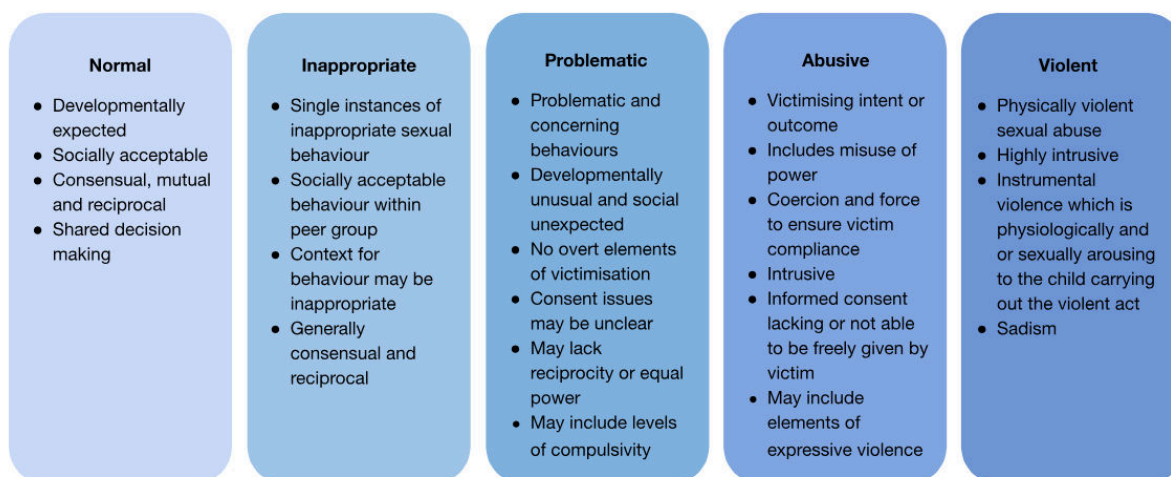
Students at Tiffin School know how to report concerns, which they can do in person to staff or the DSL's, via the anonymous reporting google forms or through the Therapeutic Practitioner and the School's Health Link Practitioner. All reports are treated seriously, including those that occur online or out of school.

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

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

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

Hackett tool



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

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

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

Tiffin School will ensure that appropriate measures are put in place to safeguard and support the individuals impacted by the behaviour, the alleged instigator and the school community.

Useful links: [Stop it Now](#) [Beyond Referrals](#)

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the student and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual according to our Behaviour Policy.

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

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

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

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

[Children as Victims and Witnesses](#) advice.

z. Upskirting

Tiffin will ensure that all staff and students are aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'upskirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to persons wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders."

Incidents of upskirting in the school will not be tolerated. Tiffin School will make decisions on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

aa. Sharing nudes and semi-nudes

Tiffin will act in accordance with guidance endorsed by DfE [Sharing nudes and semi-nudes: how to respond to an incident](#)

All incidents of sharing nudes and semi-nudes will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people who share nudes and semi-nudes of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. Tiffin School will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of sharing nudes and semi-nudes should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to sharing nudes and semi-nudes is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about a sharing nudes and semi-nudes issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (it should be confiscated). This is consistent with DfE advice "[Searching, screening and confiscation: advice for schools](#)" (DfE July 2022)

Staff will not look at, share or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

Responding to any incident that comes to attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.

- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents and carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to SPA and/or the police immediately.

The police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported sharing nudes and semi-nudes incident is experimental or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation, sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sharing nudes and semi-nudes will be referred to AfC's Single Point of Access for advice about whether or not a response by the police and/or children's social care is required.

This will facilitate consideration of whether:

- there are any offences that warrant a police investigation
- child protection procedures need to be invoked
- parents and carers require support in order to safeguard their children
- a referral to the Multi-Agency Risk and Vulnerability (MARVE) Panel is required
- any of the instigators and/or those directly/indirectly impacted by the behaviour require additional support, this may require the initiation of an early help assessment and the offer of early help services.

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the individual impacted)
- evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves
- pressure applied to a number of students (e.g. all female students in a class or year group) to create and share indecent images of themselves
- pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)

- what is known about the imagery suggests the content depicts sexual acts that are unusual for the young person's developmental stage or are violent
- sharing of indecent images places a young person at immediate risk of harm, for example the young person is presenting as suicidal or self-harming.

The DSL will make a judgement about whether or not a situation in which nudes and semi-nudes have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident or whether the school is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will consult with the police and the SPA to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

Viewing the imagery

Adults should not view nudes and semi-nudes unless there is a good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a student.

If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery then the DSL will:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Headteacher
- ensure viewing is undertaken by the DSL or deputy DSL with delegated authority from the Headteacher
- ensure viewing takes place with another member of staff present in the room, ideally the Headteacher, another DSL or a member of the Senior Leadership Team. The other staff member does not need to view the images
- wherever possible ensure viewing takes place on school premises, ideally in the Headteacher's or DSL's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the student's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Deletion of images

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

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

bb. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a student in this area, the DSL (or a deputy) will consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety. Additional advice can be found at: [National Cyber Security Centre](#)
[When to call the police](#)

cc. Online safety

Tiffin School has a policy and whole school approach to online safety, which protects and educates students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Online safety is reflected as required in all relevant policies and is considered when planning the curriculum in all subjects.

Children and young people commonly use electronic equipment including mobile phones, smart watches, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, TikTok, Twitter, MSN, Tumblr, Snapchat, Instagram and gaming platforms.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Students may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access those sites in school. Many students own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community. The school mobile phone policy insists that all KS3&4 mobile phones and smart watches are switched off on the school site. 6th form students are only permitted to use mobile phones in designated 6th form areas. The school follows the non-statutory mobile phones in schools guidance. Chromebooks should not be used outside of lessons and the LRC. Tiffin School's online safety policy explains how we try to keep students safe in school and protect and educate students in the safe use of technology. Tiffin follows the DfE guidance regarding teaching online safety in schools [Teaching online safety in schools](#)

Online bullying and sharing nudes and semi-nudes by students will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sharing nudes and semi-nudes' below).

The 4Cs

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

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

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

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

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

dd. So-called 'honour based' abuse

So-called 'honour based' abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Crimes include female genital mutilation (FGM), forced marriage and harmful practices such as breast ironing.

Honour based abuse might be committed against young people in our school who

- become involved with a boyfriend or girlfriend from a different culture or religion

- want to avoid an arranged marriage
- want to avoid a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour in or justification for abusing the human rights of others. Staff at Tiffin School will record and report any concerns about a child who might be at risk of HBA to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral to the police and/or the SPA as with any other child protection concern and may also contact the forced marriage unit for advice as necessary.

ee. Female genital mutilation (FGM)

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

Signs that FGM might happen:

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

Signs FGM might have taken place:

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

Useful information:

[Female Genital Mutilation Statutory Guidance](#)

[Local partnership guidance](#)

[National FGM Centre](#)

Teachers

while all staff should speak to the DSL (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must directly report this to the police. This is not the case if it is suspected but not known or if a student is at risk of FGM. Teachers will face disciplinary sanctions for failing to do so. The teacher should tell the DSL or a deputy who will support the teacher in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

Other members of staff

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

ff. Forced marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not being allowed to return to England.

Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

For further information see: [Guidance forced marriage](#)

School staff will never attempt to intervene directly as a school or through a third party. Contact will be made with the Single Point of Access or the Forced Marriage Unit (020 7008 0151) for advice and support.

[Asian Women's Resource Centre](#)

gg. Child trafficking and modern slavery

Human trafficking, is defined in the UN Protocol on trafficking, adopted in 2000, as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern slavery as it is often referred to, is a crime and a safeguarding issue affecting millions across the world and in the United Kingdom.

Staff at Tiffin School are alert to the existence of modern slavery and child trafficking and concerns will be recorded and reported to SPA as appropriate.

Types of Modern Slavery

Examples of industries and services where slavery exist in the UK today, the victims of which include children and young people are (with examples)

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

- additionally, victims can be forced into criminal activities such as cannabis production, theft or begging.

Modern slavery is an issue that transcends age, gender and ethnicities. It can include victims that have been brought to the UK from overseas or vulnerable people in the UK being forced illegally to work against their will. Children and young people have an increased vulnerability to slavery.

Poverty, limited opportunities at home, lack of education, unstable social and political conditions and war are some of the situations that contribute to trafficking of victims and slavery.

Slavery can be linked to a number of safeguarding issues, including child sexual exploitation, but normally includes at least one of the following specific situations.

- Child trafficking: young people being moved internationally or domestically so that they can be exploited.
- Forced labour: victims are forced to work through physical or mental threat, against their will, often for very long hours for little or no pay, in conditions that can affect their physical and mental health. They are often subjected to verbal or physical threats of violence against them as individuals or their families.
- Debt bondage: victims forced to work to pay off debts that they will never be able to. Debts can be passed down to children. Extreme examples include where a victim may be owned or controlled by an 'employer' or sold as a commodity.

Possible signs and indicators that someone is a victim of modern slavery that anyone working with children and young people should be aware of include:

- physical appearance: poor physical condition, malnourishment, untreated injuries and looking neglected
- isolation: victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. They may not interact and be unfamiliar in their local community
- poor living conditions: victims may be living in dirty, cramped or overcrowded accommodation, with multiple children living and working at the same address or premises
- personal belongings: few possessions, wearing the same clothes each day and no identification documents
- restricted freedom: victims have little opportunity to move freely and may be kept from having access to their passport
- unusual travel times: victims may be dropped off or collected from work on a regular basis either very early or late at night
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to approach people and have lack of trust or concern about making a report should they be deportation or fear of violence on their family

If a member of Tiffin School staff suspects that a student may be a victim they will, in the first instance, report their concerns to the DSL and record their concerns on CPOMS.

The DSL will seek advice and support from SPA who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM).

Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

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

hh. Private fostering

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Tiffin School recognises that most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases. Therefore all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When Tiffin School becomes aware of a private fostering arrangement for a student that has not been notified to Children's Social Care, we will encourage parents and private foster carers to notify Children's Social Care themselves in the first instance, but also alert them to our mandatory duty as a school to inform the local authority of children in such arrangements.

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

ii. Preventing radicalisation and extremism

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

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

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

Terrorism is an action that:

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

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

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

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Children are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.

- We perform a risk assessment assessing how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

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

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

Useful links:

[Local partnership guidance](#)

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

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

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

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

The Prevent lead in Kingston is:

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

[Kingston Prevent referral pathway](#)

jj. Child abuse linked to faith or belief

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

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

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

Useful links:

[Metropolitan Police advice](#)

[Short Youtube introduction video](#)

[National FGM Centre](#)

kk. Suicide and self-harm

Suicide: an act of deliberate self-harm which results in death.

Self-harm: self-poisoning or self-injury, irrespective of the apparent purpose of the act.

Suicide and self-harm links: self-harm is generally a way of coping with overwhelming emotional distress. Many young people self-harm where there is no suicidal intent. However, research shows that young people who self-harm can be at a higher risk of suicide.

Self-harm is a coping mechanism that enables a person to express difficult emotions. Young people who hurt themselves often feel that physical pain is easier to deal with than the emotional pain they are experiencing, because it is tangible. But the behaviour only provides temporary relief and fails to deal with the underlying issues that a young person is facing. For some people, self-harm may last for a short time. For others, it can become a long-term problem. Some people self-harm, stop for a while, and return to it months, even years, later, in times of distress.

Risk factors that indicate a child or young person may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as bereavement; bullying; online bullying; mental health problems including eating disorders; family problems such as domestic violence; or any form of abuse or conflict between the child and parents.

The most common forms of self-harm are

- cutting
- biting self
- burning, scalding, branding
- picking at skin, reopening old wounds
- breaking bones, punching

- hair pulling
- head banging
- ingesting objects or toxic substances
- overdosing with a medicine

Self-harm is usually a secretive behaviour but signs may include:

- wearing long sleeves at inappropriate times
- spending more time in the bathroom
- unexplained cuts or bruises, burns or other injuries
- unexplained smell of Dettol, TCP, etc.
- low mood - seems to be depressed or unhappy, low self-esteem, feelings of worthlessness
- any mood changes - anger, sadness
- changes in eating or sleeping patterns
- losing friendships, spending more time by themselves and becoming more private or defensive
- withdrawal from activities that used to be enjoyed
- abuse of alcohol and/or drugs

Tiffin recognises that any student who self-harms or expresses thoughts about self-harm and/or suicide must be taken seriously and appropriate help and intervention will be offered at the earliest point. Any member of staff who is made aware that a student has self-harmed, or is contemplating self-harm or suicide, will record and report the matter to the DSL as soon as possible as with any other safeguarding concern.

A safety plan will be developed for any student at risk of suicide.

[Papyrus](#)

II. Fabricated or induced illnesses

Staff at Tiffin School are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FI) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

There are many ways that the parent/carer may fabricate (make up or lie about) or induce illness in a child:

- lying about their child's symptoms
- deliberately contaminating or manipulating clinical tests to fake evidence of illness. For example, by adding blood or glucose to urine samples, placing their blood on the child's clothing to suggest unusual bleeding, or heating thermometers to suggest the presence of a fever
- poisoning their child with unsuitable and non-prescribed medicine
- infecting their child's wounds or injecting the child with dirt or poo
- inducing unconsciousness by suffocating their child
- not treating or mistreating genuine conditions so they get worse

- withholding food, resulting in the child failing to develop physically and mentally at the expected rate.

The very presence of an illness can act as a stimulus to the abnormal behaviour and also provide the parent with opportunities for inducing symptoms.

Fabricated or induced illness is most commonly identified in younger children. Although some of these children die, there are many that do not die as a result of having their illness fabricated or induced, but who suffer significant long term physical or psychological health consequences.

Fabrication of illness may not necessarily result in a child experiencing physical harm, but there may be concerns about the child suffering emotional harm. They may suffer emotional harm and/or disturbed family relationships as a result of an abnormal relationship with their parent.

Staff at Tiffin School will record and report any concerns about a child who might be experiencing fabricated or induced illness to the DSL via CPOMS, as with any other safeguarding concern. The DSL will consider the need to make a referral or consult with the Single Point of Access as with any other child protection concern.

The Royal College of Paediatrics and Child Health (RCPCH) has issued updated guidance:

<https://childprotection.rcpch.ac.uk/resources/perplexing-presentations-and-fii/>

Appendix 2: Concern reporting form in the absence of CPOMS

Only use this form if CPOMS is unavailable. The form is available from the school reception.

Concern reporting form

Please complete this form as soon as possible if you have any concerns about a student

student's name			
student's DOB		Day/Date/Time	
Name of member of staff noting concern			

Details of concern

(Please describe as fully as possible and use the student's own words where applicable. Include names of witnesses, if relevant, and any immediate action taken.)

Body map attached: Yes No

Signature:

Date:

Please ensure that the completed form is given to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead

Actions taken			
Date	Person taking action	Action	Signature

If the parent or carer has **NOT** been informed, please state the reason for this decision:

Signature:

Date:

Appropriate feedback must be given to the person completing the Record of Concern Form

Feedback given to:

Feedback given by:

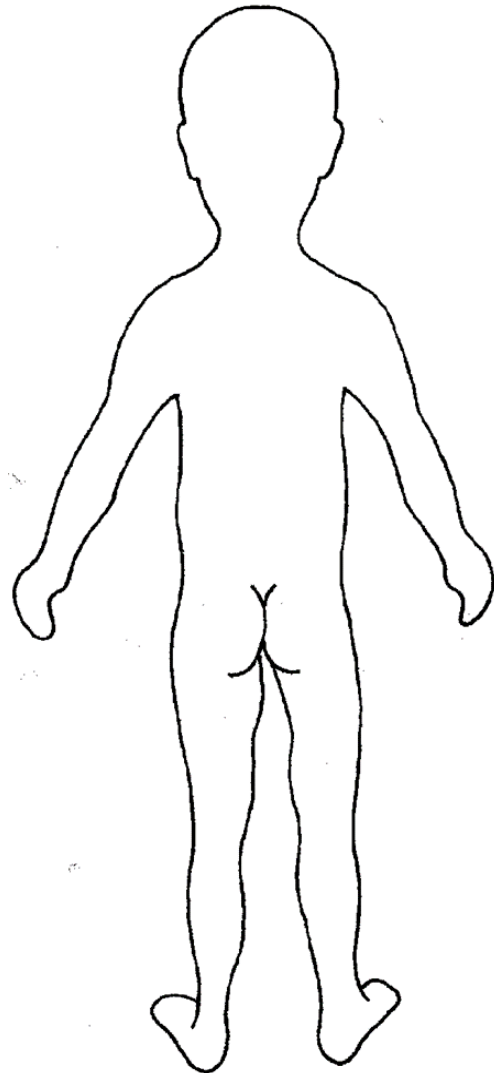
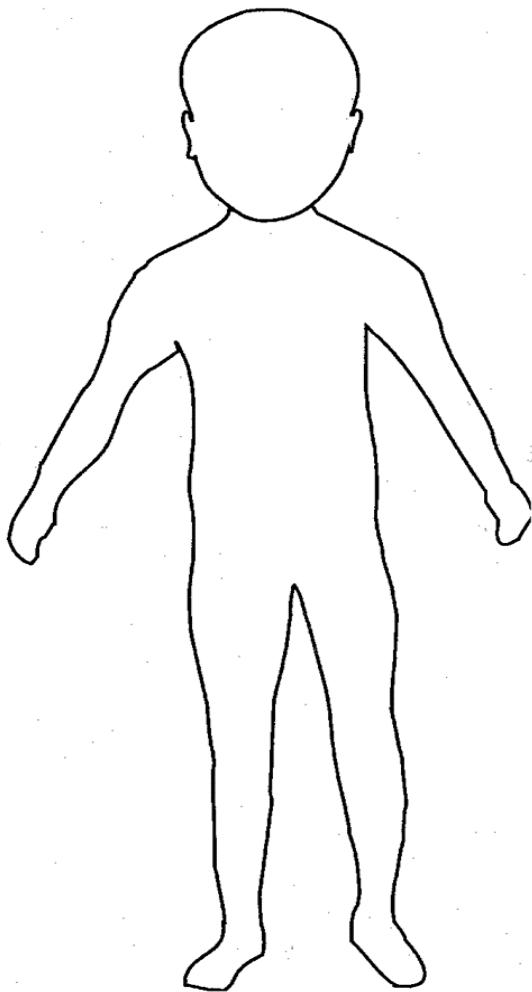
Signature:

Date:

Appendix 3: Body map

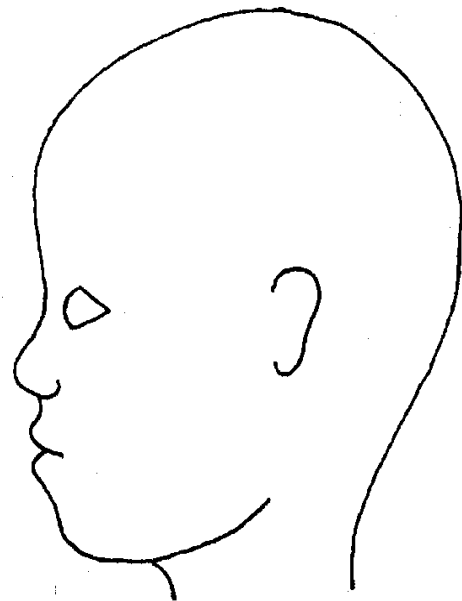
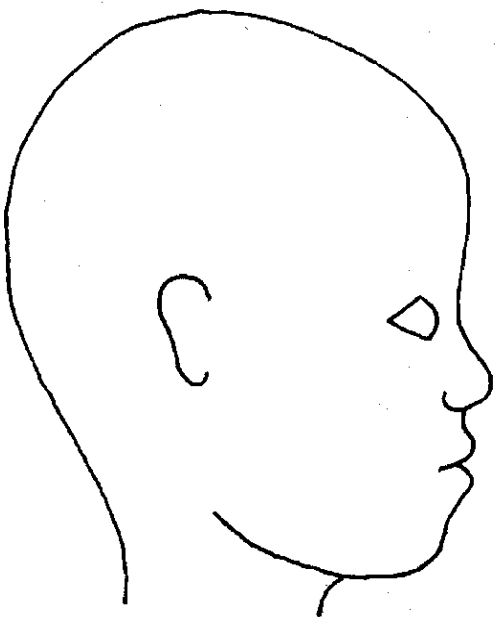
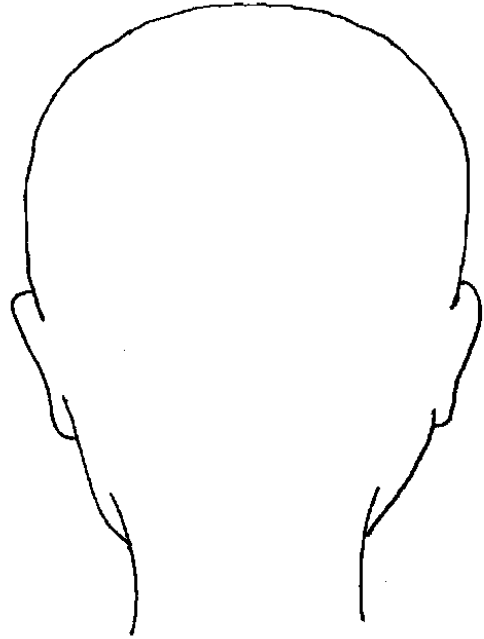
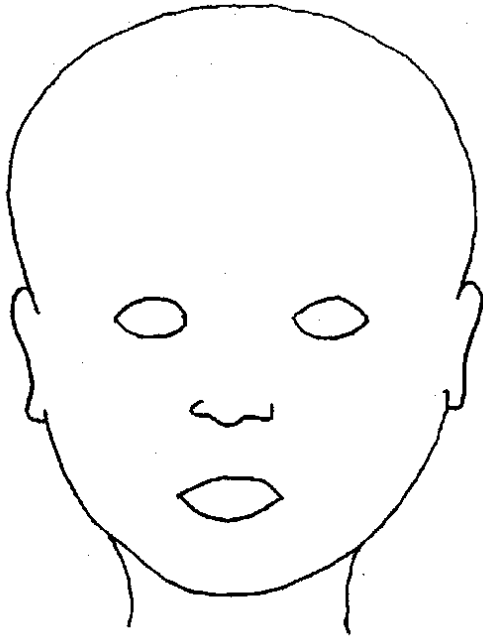
(This is available on CPOMS. Use this if CPOMS is unavailable and it must be completed at time of observation)

Name of student:		Date of Birth:	
Name of Staff:		Date and time of observation:	



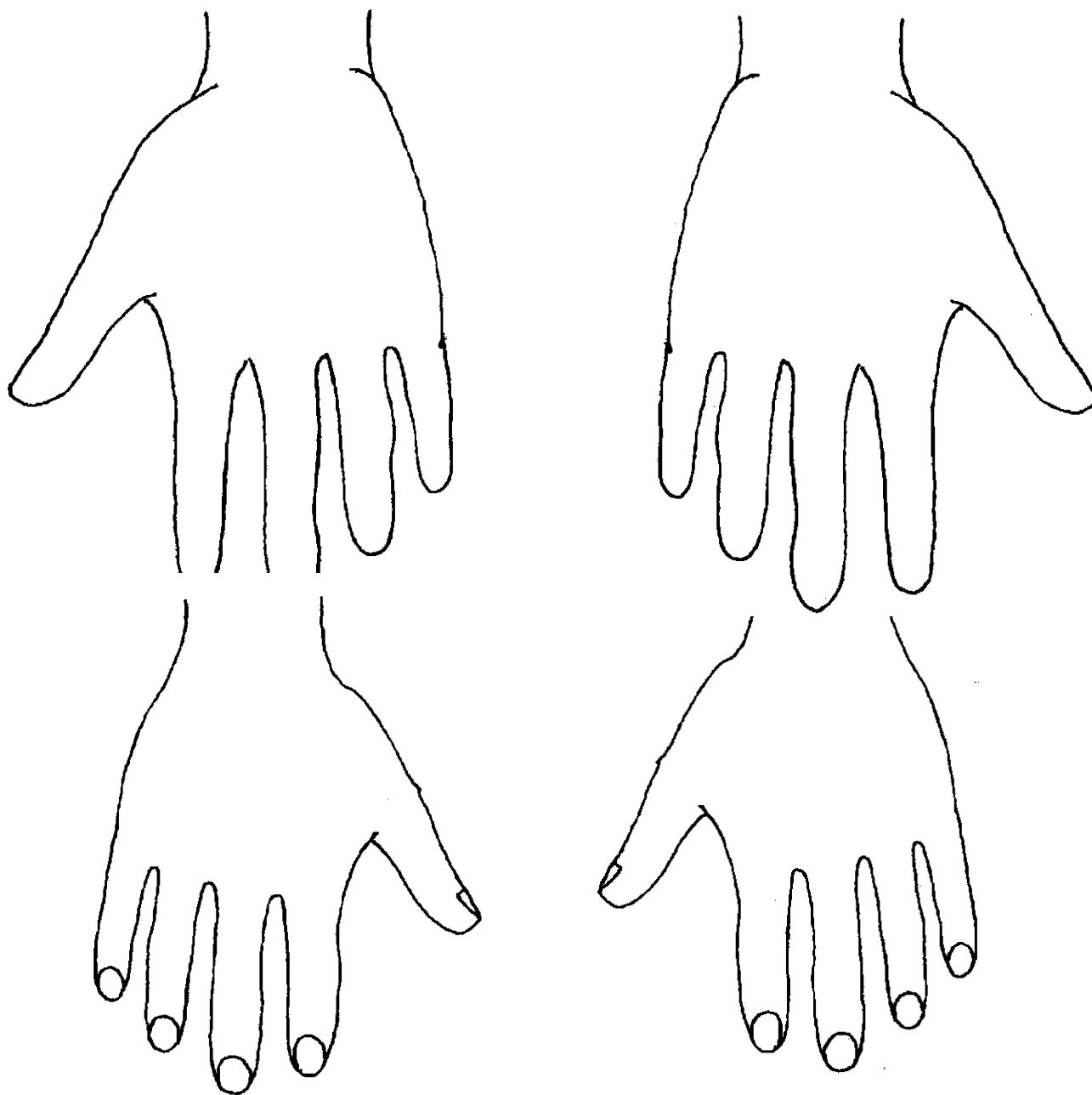
Signature: Date:

Name of student:		Date of Birth:	
Name of Staff:		Date and time of observation:	



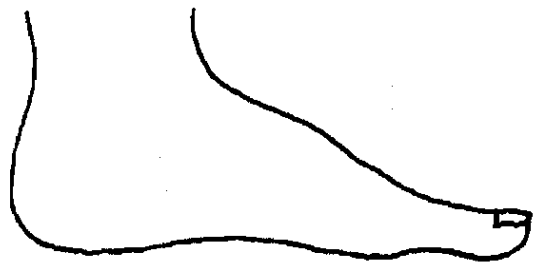
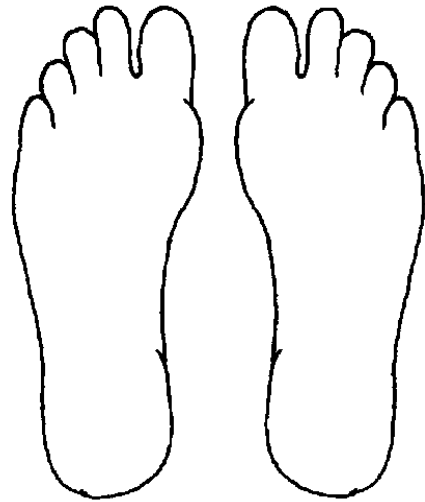
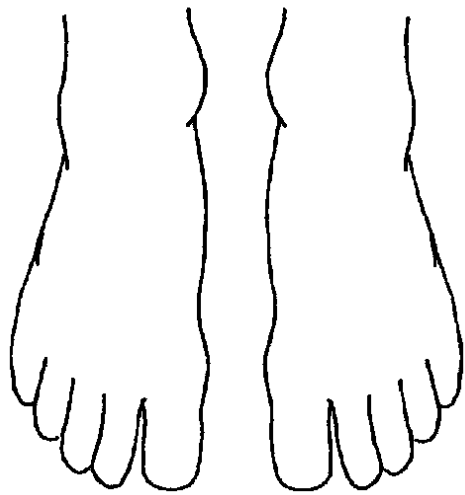
Signature:

Name of student:		Date of Birth:	
Name of Staff:		Date and time of observation:	



Signature: Date:

Name of student:		Date of Birth:	
Name of Staff:		Date and time of observation:	



Signature: Date:

Appendix 4: Links

Children Act 1989 Care Planning, Placement and Case Review:

www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review

Children Act 2004: www.legislation.gov.uk/ukpga/2004/31/contents

Education Act 2002: www.legislation.gov.uk/ukpga/2002/32/section/175

London Child Protection Procedures and Practice Guidance: www.londoncp.co.uk

Keeping Children Safe in Education 2024:

https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

Working Together to Safeguard Children:

https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf

Inspecting Safeguarding in Early Years, Education and Skills: [Inspecting safeguarding in early years, education and skills - GOV.UK](https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills)

Teachers' Standards: <https://www.gov.uk/government/publications/teachers-standards>

What to do if You're Worried a Child is Being Abused:

www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

Information Sharing:

www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

Schools Covid-19 Operational guidance:

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/schools-covid-19-operational-guidance>

Statutory framework for the early years foundation stage:

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

Statutory guidance for alternative provision:

<https://www.gov.uk/government/publications/alternative-provision>

Engaging Neglectful Parents from Affluent Backgrounds:

<https://www.gold.ac.uk/media/documents-by-section/departments/social-therapeutic-and-comms-studies/Report--Neglect-in-Affluent-Families-1-December-2017.pdf>

Neglect Toolkit:

<https://kingstonandrighmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/child-neglect-toolkit-181.php>

KRSCP Multi-agency Threshold Document:

<https://kingstonandrighmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/multi-agency-threshold-document-144.php>

ACEs video: <https://www.youtube.com/watch?v=XHgLYI9KZ-A>

Mental health and behaviour in schools guidance:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

NSPCC: <https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/>

Mind: <https://www.mind.org.uk/>

Kooth: <https://www.kooth.com/>

Domestic Abuse Act 2021: <https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>

Children Missing Education Statutory Guidance:

<https://www.gov.uk/government/publications/children-missing-education>

Local Guidance for children missing education:

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/children-missing-education-196.php>

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE September 2021):

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Beyond Referrals Toolkit:

<https://www.contextualsafeguarding.org.uk/toolkits/beyond-referrals-toolkit-schools/>

When to call the police:

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Stop it Now:

<https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/>

Beyond Referrals:

<https://www.csnetwork.org.uk/en/beyond-referrals-levers-for-addressing-harmful-sexual-behaviour-in-schools>

Safeguarding Children from Sexual Exploitation:

https://www.londoncp.co.uk/sg_sex_exploit_ch.html?zoom_highlight=child+sexual+exploitation

Child Sexual Exploitation Definition and Guide:

www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Cyber Choices:

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

National Cyber Security Centre: [National Cyber Security Centre](#)

Preventing youth violence and gang involvement:

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

Criminal exploitation of children and vulnerable adults: county lines:

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Sharing nudes and semi-nudes: how to respond to an incident:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

Searching, Screening and Confiscation: [Searching, Screening and Confiscation - GOV.UK](#)

Female Genital Mutilation Statutory Guidance:

www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

Kingston and Richmond Safeguarding Children Partnership Female Genital Mutilation Policy:

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/female-genital-mutilation-policy-203.php>

Guidance Forced Marriage: www.gov.uk/guidance/forced-marriage

Asian Women's Resource Centre: <https://www.asianwomenscentre.org.uk/>

Modern slavery: how to identify and support victims:

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Looking After Someone Else's Child: www.gov.uk/looking-after-someone-elses-child

Protecting Children from Radicalisation: The Prevent Duty:

www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Educate Against Hate: [Educate against hate](#)

Papyrus: <https://www.papyrus-uk.org/suicide-prevention/>

RCPCH updated guidance on fabricated or induced illness:

<https://childprotection.rcpch.ac.uk/resources/perplexing-presentations-and-fii/>

Role and Responsibilities of the Designated Teacher:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/269764/role_and_responsibilities_of_the_designated_teacher_for_looked_after_children.pdf

AfC Virtual School: <https://www.afcvirtualschool.org.uk/>

Early Help Assessment: www.achievingforchildren.org.uk/early-help-assessment

Guidance for Safer Working Practice:

<https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>

London Child Protection Procedures: Allegations:

https://www.londoncp.co.uk/alleg_staff.html?zoom_highlight=allegations

Contextual Safeguarding:

<https://www.contextualsafeguarding.org.uk/about-us/what-is-contextual-safeguarding/>

KRSCP guidance to MARVE:

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/child-exploitation-marve-88.php>

KRSCP threshold:

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/multi-agency-threshold-document-144.php>

Missing Protocol:

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/missing-protocol-211.php>

Early Help Strategy:

[https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/media/upload/fck/file/EH%20Partnership%20Strategy%209%20Nov%202020%20\(1\)F.pdf](https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/media/upload/fck/file/EH%20Partnership%20Strategy%209%20Nov%202020%20(1)F.pdf)

Criminal Exploitation of Children and Vulnerable Adults: County Lines:

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Teaching Online Safety: <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

Children who run away or go missing from home or care:

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

NSPCC Responding to a child's disclosure of abuse: <https://www.youtube.com/watch?v=bvJ5uBIGYqE>

SPA online referral form:

https://www.richmond.gov.uk/services/children_and_family_care/single_point_of_access/single_point_of_access_for_professionals

AfC physical intervention training (primary):

https://5f2fe3253cd1dfa0d089-bf8b2cdb6a1dc2999fecbc372702016c.ssl.cf3.rackcdn.com/uploads/ckeditor/attachments/7799/EISS_Physical_Intervention.pdf

Price training: <https://www.pricetraining.co.uk/your-sector/schools-education/>

Positive environments where children can flourish:

<https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish/positive-environments-where-children-can-flourish>

Use of reasonable force:

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Appendix 5: The Seven Rs

Receive

Listen to what is being said, without displaying shock or disbelief. Accept what is said and take it seriously. Make a note of what has been said as soon as practicable.

Reassure

Reassure the student /student, but only as far as is honest and reliable. Do not make promises you may not be able to keep, e.g.: “I’ll stay with you”, or “everything will be alright now” or “I’ll keep this confidential”. Do reassure, e.g. you could say “I believe you”, “I am glad you came to me”, “I am sorry this has happened”, “we are going to do something together to get help”.

Respond

Respond to the student/student only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.

Do not ask ‘leading’ questions, i.e. “did he touch your private parts?” or “did she hurt you?”. Such questions may invalidate your evidence (and the child’s) in any later court proceedings.

Instead, make use of open ended questions which offers the child the opportunity to provide more information about an event in a way that is not leading, suggestive or putting them under pressure. Open questions may use: How? When? Who? Where?

Questions beginning with the phrases “tell me”, “describe” or “explain” are useful:

- Tell me what happened, tell me who was there....
- Explain what you mean when you say....
- Describe the place to me....
- Do not criticise the alleged perpetrator; the student may care about him/her, and reconciliation may be possible.
- Do not ask the student to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the student that it will be the designated lead for safeguarding or Headteacher.

Report

Share concerns with the DSL as soon as possible. If you are unable to contact your DSL, deputy DSL, or most senior member of staff, if the child is at risk of immediate harm, you **MUST** contact Achieving for Children SPA service or Police.

If you are dissatisfied with the response from the DSL or children’s social work, you should ask for the decision to be reconsidered, giving your reasons for this.

A formal referral or any urgent medical treatment must not be delayed by the unavailability of designated staff.

Record

If possible, make some very brief notes at the time and write them up as soon as possible. Keep your original notes on file.

Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse in a child or young person, will make a written record as soon as practical,

recording the disclosure using the child's own words, what was said or seen and the location both of the abuse and the disclosure.

Record the date, time, place, person's present and noticeable non-verbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into proper words.

A record of a concern, suspicion or allegation should be made at the time of or as soon as possible after the event. Dates and times of events should be recorded as accurately as possible, together with a note of when the record was made.

Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

A record should be made of any visible marks, bruising or injuries to a child that give cause for concern. This may be completed on a body map. (See Appendix 4). The child should not be examined intimately or pictures taken of any injuries / marks.

All records must be signed and dated clearly with the name of the signatory clearly printed. Children **MUST NOT** be asked to make a written statement themselves or to sign any records. All records of a child protection nature (handwritten or typed) are passed to the DSL.

Remember

Support the child: listen, reassure, and be available. Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.

Try to get some support for yourself if you need it.

Review

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure?
- Have these been remedied?
- Is further training required?

Signed :	Dated :
----------	---------

This record form will be held securely, either digitally or in paper form, in one central file with HR, in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.