HALCYON
LONDON INTERNATIONAL SCHOOL

An exceptional education that draws out the unique potential of each student

Innovation | Collaboration | Community

Safeguarding &
Promoting Welfare of Children Policy
(Child Protection and Safeguarding and Safer Recruitment)

This policy is available from our website (halcyonschool.com) and in hard copy on request.

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education (2023)](); [Working Together to Safeguard Children (2018)](); and the [Governance Handbook](). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (as set out below). This policy is also based on legislation and guidance, which includes the following:

- *[The Children Act 1989]() and The Children Act [2004](), which provides a framework for the care and protection of children*
- *Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18*
- *[Statutory guidance on FGM](), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM*
- *[The Rehabilitation of Offenders Act 1974](), which outlines when people with criminal convictions can work with children*
- *Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](), which defines what 'regulated activity' is in relation to children*
- *[Statutory guidance on the Prevent duty](), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism*
- *[Human Rights Act 1998](). Being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to members of our school community under the European Convention on Human Rights (ECHR)*
- *[The Equality Act 2010]()*

The following three safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- *The local authority (LA)*
- *A clinical commissioning group for an area within the LA*
- *The chief officer of police for a police area in the LA area*

This policy should be considered alongside and in conjunction with the suite of policies concerning the safety and welfare of students: Wellbeing Policy; Anti-Bullying ; Behaviour & Discipline; Educational Trips (incorporating Health & Safety of Students Outside School); First Aid; Supervision (including MIssing Student Procedure); Attendance; Safer Recruitment; PSHEE; RSHE; Confidentiality; Online Safety; Risk Assessment; and Halcyon's Mission.

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Key Contacts:

Role/Organisation	Name	Contact
Designated Safeguarding Lead (DSL)	Asil Al Shammari	aal-shammari@halcyonschool.com
Deputy DSL	Shah-Noor Ashraf	sashraf@halcyonschool.com
Local authority designated officer (LADO)	Kembra Healy	kembra.healy@rbkc.gov.uk
Board of Trustees Safeguarding Lead	Natalie Hardie	nhardie@board.halcyonschool.com
Chair of Board of Trustees	Rita Halbright	rhalbright@board.halcyonschool.com
Childline		0800 1111
Channel helpline		020 7340 7264

1. Policy Statement

Halcyon London International School is committed to safeguarding and promoting the welfare of all its students. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees in the school, and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The Board of Trustees expect all staff and volunteers to share this commitment by demonstrating their understanding of how each adult working on behalf of the school has an active part to play in protecting children from harm and promoting their welfare. All Halcyon staff are advised to maintain an attitude of "it could happen here" in relation to safeguarding. Halcyon cultivates a climate where everyone should feel comfortable to speak about these matters openly. When concerned about the welfare of a child, staff members should always act in the interests of the child.

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2. Definitions

Halcyon London International School takes its duty of care very seriously and seeks to provide a school environment which is consistent with the International Baccalaureate (IB) Learner Profile and where all children are safe, secure, valued, respected, listened to.

Safeguarding and promoting the welfare of children means:
- Protecting children from all forms of maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Section 7 explains the different types of abuse.

Neglect is a form of abuse and 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. Section 7 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Victim is a widely understood and recognised term, but not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. You should be prepared to use any term the child feels most comfortable with when managing an incident.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms, but you should think carefully about what terminology you use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. You should decide what's appropriate and which terms to use on a case-by-case basis.

3. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

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We give special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are missing from education
- whose parent/carer has expressed an intention to remove them from school to be home educated

4. Keeping children safe

Halcyon has a responsibility to provide a safe environment in which children can learn. We do this by:
  A. promoting a caring, safe and positive environment within Halcyon - supported by a commitment on the part of all stakeholders to the IB Learner Profile
  B. ensuring that staff (and volunteers) are appropriately trained in safeguarding and child protection according to their role and responsibilities
  C. encouraging the self-esteem and self-assertiveness of all students through the curriculum so that the children themselves become aware of danger and risk and what is acceptable behaviour and what is not
  D. understanding how to identify students who may be at risk of radicalisation and knowing how to support them
  E. working in partnership with all other services and agencies involved in the safeguarding of children
  F. working closely with the school's landlord on safeguarding and site security, including secure management of the building entrance (as detailed in the Supervision Policy)
  G. displaying appropriate posters that detail contact numbers for child protection helplines
  H. always following safer recruitment procedures when appointing staff or volunteers to work in our school
  I. taking all practicable steps to ensure that school premises are as secure as circumstances permit; and welcoming visitors in a safe and secure manner

J. operating robust and sensible health and safety procedures and undertaking the required risk assessments when planning out of school activities or trips
K. ensuring that any community groups which use our premises for the provision of services to children operate appropriate child protection procedures
L. giving all staff the opportunity to contribute to, and shape, safeguarding arrangements and safeguarding policy.

5. Confidentiality

The School's Confidentiality Policy outlines our approach to confidentiality as this relates to safeguarding.

6. Managing safeguarding

All staff must be clear about their own role and that of others in providing a caring and safe environment for all students. All staff must know how they should respond to any concerns about an individual child that may arise.

All staff will read and understand Part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

A. Our systems in support of safeguarding, including this child protection and safeguarding policy; the staff code of conduct; the role and identity of the Designated Safeguarding Lead (DSL) and Deputy DSL; the Behaviour Policy; the Anti-bullying Policy; the Online Safety Policy; and the safeguarding response to children who go missing from education, contained within the Supervision Policy.
B. The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
C. The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
D. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

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E. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

F. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

6.1 The Designated Safeguarding Lead (DSL).The DSL is a member of the senior leadership team. Our DSL is Asil Al Shammari. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns (aal-shammari@halcyonschool.com)

When the DSL is absent, the Deputy DSL– Shah-Noor Ashraf– will act as cover.

If the DSL and Deputy DSL are not available, The Student Wellbeing Leader, Nito Harvey, will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The Designated Safeguarding Lead will support staff to carry out their safeguarding duties and will liaise closely with other external services. The DSL will also keep the Director informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in their job description, in Appendix 2

The DSL is a member of the The Student Wellbeing Team, which is led by the Student Wellbeing Leader. Additionally, this team comprises the Student Wellbeing Support Leader, the School Counsellor, the Deputy Designated Safeguarding Lead and the Learning Coach. The Student Wellbeing Leader reports to the Director and is a member of the School Leadership Team. The Director reports to the Board.

6.2 The Director

The Director is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers:

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- ○ Are informed of our systems which support safeguarding, including this policy, as part of their induction
- ○ Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

6.3 The Board of Trustees

The governing board will:
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Director to account for its implementation
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This Board member is known as the Board Designated Safeguarding Lead.
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Director, where appropriate
- All governors will read Keeping Children Safe in Education in its entirety

7. Staff training

All staff are made aware, during their induction period (and regularly thereafter), of Halcyon's safeguarding systems , including:

A. Halcyon's Safeguarding & Promoting Welfare of Children Policy (this document)
B. Staff code of conduct
C. *Keeping children safe in education: safeguarding information for all school staff (September 2023)* (Appendix 1)
D. *What to do if you're worried a child is being abused – Advice for practitioners (March 2015) (Appendix 3)*
E. *Safeguarding response to children who go missing from education; and*
F. Who the Designated and Deputy Safeguarding Leads are and their role.

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All staff are required to sign a document confirming that they have been made aware of, have read, and that they understand the above information.

So that they are equipped with the skills needed to keep children safe, all staff receive training in Child Protection in Education Training (Level 2), the Prevent Duty and mandatory reporting of FGM. Staff are trained as part of their induction process before students arrive for classes.

All staff are regularly updated via email and staff meetings as required to ensure their knowledge is kept up-to-date.

The Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, the Student Wellbeing Leader, the School Leadership Team, and Director have higher-level child protection training, Prevent Duty awareness training and training in inter-agency working.

All Halcyon Board members have training for Child Protection in Education(Level 2) and Prevent Duty awareness.. At least one Board member will always have the same higher-level child protection training as the Designated Safeguarding Lead and will be known as Halcyon's "Board Designated Safeguarding Lead" (also known as the "Nominated Safeguarding Governor").

8. Recognition of abuse

All staff must be alert to any possible indicators that a child is suffering harm and report any concerns to the Designated Safeguarding Lead.

A. Types of abuse include:
- Physical abuse, for example beating or punching; domestic violence; gangs and youth violence; gender-based violence/violence against women and girls (VAWG) or otherwise causing physical harm to the child
- Emotional abuse, for example rejection and denial of affection
- Sexual abuse, for example sexual assault, sexual violence and harassment (including upskirting), Child Sexual Exploitation (CSE), or encouraging a child to view pornographic material
- Domestic abuse can be physical, sexual, financial, psychological or emotional. Witnessing domestic abuse can have a lasting impact on children
- Child Criminal Exploitation (CCE) including children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, or sexual exploitation. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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- Neglect, or 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:
  - o Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
  - o Protect a child from physical and emotional harm or danger
  - o Ensure adequate supervision (including the use of inadequate care-givers)
  - o Ensure access to appropriate medical care or treatment
- Cyber abuse linked particularly to emotional and sexual abuse, for example sexting
- Prejudice-based and discriminatory bullying
- Child-on-child abuse (see 13.8 and 13.9, below)
- Honour-based violence (HBV), including female genital mutilation (FGM) (NB: teachers have a **mandatory reporting duty** for suspected cases of FGM – see section 8 of this policy); forced marriage and practices such as breast ironing
- Faith abuse arising from religion or superstition

B. Signs of abuse include (but are not limited to):
- the student says they have been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the student's behaviour is atypical or stands out from the group
- there is a sudden negative change in the student's behaviour
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the student's development is delayed
- the student loses or gains weight
- the student appears neglected, e.g. dirty, hungry, inadequately clothed
- the student is reluctant to go home, or has been openly rejected by his/her parents or carers
- attendance and attitudes to learning deteriorate.

Halcyon recognises that students with special educational needs can face additional safeguarding challenges and that they may face communication barriers and difficulties. Staff are reminded never to make an assumption about possible indicators of abuse nor to dismiss an indicator without further exploration.

C. Child-on-child abuse (ie: a student abusing another student) includes:

- online abuse (as well as face to face)
- abusive, harassing, and misogynistic messages
- sharing of abusive images and pornography, to those who don't want to receive such content
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) especially around chat groups
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

D. Protecting against radicalisation

Radicalisation refers to the process by which a person comes to support forms of extremism. Protecting students from the risk of radicalisation is considered part of Halcyon's wider safeguarding duties, and is similar in nature to protecting students from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

As with managing other safeguarding risks, staff should be alert to changes in student's behaviour which could indicate that they may be in need of help or protection.

In accordance with the statutory Prevent Duty (under section 26 of the Counter-Terrorism and Security Act 2015), Halcyon will:
- assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology

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- ensure its safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board
- ensure all staff undertake Prevent Duty awareness training
- ensure the Designated Safeguarding Lead undertakes more in-depth training so they are able to provide advice and support to other staff on protecting children from the risk of radicalisation
- ensure that students are safe from terrorist and extremist material when online in school, through filtering and teaching students about online safety in general
- build students' resilience to radicalisation through Personal, Social, Health & Economic (PSHEE) education debate and the promotion of fundamental British values.

E. Online safety and the use of mobile technology
The School's aim is to enable students to become safe and responsible users of digital technologies - to be digitally literate citizens. We also recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

There are 4 key categories of risk:

- **Content**. Being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact.** Being subjected to harmful online interaction with other users, such as 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.** Personal online behaviour that increases the likelihood of, or causes, harm, such as 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.

To address these risks, all staff and students are made aware of, and discuss, our Online Safety Policy, including Acceptable Use of Digital Technologies. Our school educates students about online safety as part of our curriculum. For example:
- the safe use of social media, the internet and technology
- keeping personal information private
- how to recognise unacceptable behaviour online

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- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- how to report concerns or risks arising from the filtering and/or monitoring of Internet content provided by the School
- how to protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology
- how to identify, intervene in and manage any incidents or concerns, where appropriate

We train staff, both as a part of their induction and through regular training updates each year, about safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

We educate parents/carers about online safety via our website, communications sent directly to them and during parent workshops. We will also share clear procedures with them so they know how to raise concerns about online safety.

We ensure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras; for example, that staff will not take pictures or recordings of students on their personal phones or cameras.

We ensure all students, parents/carers, staff, volunteers and trustees are aware that they sign an agreement to abide by and uphold all school policies, including the acceptable use of digital technologies, which includes use of the internet, the school's digital systems, and mobile and smart technology.

We make clear the sanctions we will use if a student is in breach of our policies on the acceptable use of digital technologies

We ensure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation.

We have in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's internet provision. Staff understand their expectations, roles and responsibilities around filtering and monitoring systems.

For further information, please refer to the School's Online Safety Policy.

F. Children missing from education

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A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

Halcyon has clear procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. The School understands its Local Authority reporting duties as outlined in *Keeping Children Safe in Education (September 2022)* and *Children missing education (September 2016).*

All staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

G. Early Help

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day.

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support

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other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

9. Teaching safeguarding and reporting systems for students

Children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead.

Halcyon students are taught about safeguarding issues through PSHEE as part of our broad and balanced International Baccalaureate curriculum. This will cover knowing appropriate boundaries; how to raise/express concerns; and will explain levels of confidentiality. It will also tackle specific forms of harm and abuse such as child-on-child abuse, FGM and radicalisation.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, we
- make it clear to students - through assemblies, grade level meetings, classroom and daily expectations and one-to-one meetings - that their concerns will be taken seriously, and that they can safely express their views and give feedback
- ensure our reporting systems are well promoted, easily understood and easily accessible for students
- make visible the purpose and profile, including contact details, of the DSL and Deputy DSL, the Wellbeing Team, and associated confidential reporting systems
- provide safeguarding and coaching training for all staff

Students are encouraged to report any concerns through
- The DSL and Deputy DSL
- Mentors
- The Wellbeing Team
- The school counsellor
- Any member of staff with whom they feel comfortable
- An anonymous safeguarding form

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Staff are required to report concerns through our safeguarding log and to report to the DSL and/or the Deputy DSL. If staff are unsure, they should report to the DSL.

10. Responding to concerns about a student

All children must be able to place their trust and confidence in any adult working in the school in a paid, voluntary, or peripatetic capacity. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately. All staff must therefore know what to do if a child chooses to talk to them about any matter that raises child protection concerns.

Anybody can make a safeguarding referral. If at any point there is a risk of immediate serious harm to a child a referral to children's social care should be made immediately. If you make a referral, inform the DSL immediately subsequent to the referral.

All staff should:
- reassure victims that they are being taken seriously and that they will be supported and kept safe. They should not be given the impression they are creating a problem or made to feel ashamed for making a report
- listen to what the child is saying without interruption and without asking leading questions
- respect the child's right to privacy but not promise confidentiality
- reassure the child that they have done the right thing in telling
- explain to the child that in order to keep him/her safe from harm the information that has been shared must be passed on
- know the indicators of abuse and neglect for specific safeguarding issues such as child criminal exploitation and child sexual exploitation
- be vigilant as multiple safeguarding issues will overlap with one another
- be aware of the risk factors that increase the likelihood of involvement in serious violence
- report what was has been disclosed to the Designated Safeguarding Lead, or the Deputy Designated Safeguarding Lead, in the school as soon as possible
- record, as soon as is practicable, what was said using the child's actual words, including the time and place of the conversation, what was done by whom and in whose presence
- sign and date the record and keep it securely, handing it to the Designated Safeguarding Lead as soon as possible.

The Designated Safeguarding Lead will:
- respond to any urgent medical needs of the child

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- consider whether the child has suffered, or is likely to suffer significant harm
- check whether the child is currently subject to a Child Protection Plan or has been previously subject to a Plan
- confirm whether any previous concerns have been raised by staff.

If staff have concerns about a child they should raise these with the Designated Safeguarding Lead, but they can refer concerns to children's social care directly. They should also refer to the DfE document *What to do if you're worried a child is being abused – Advice for practitioners (March 2015)* *(Appendix 3)* to help them identify child abuse and neglect and take appropriate action in response.

The opinions of whoever has raised the concern (especially if a parent or student) must not assume disproportionate importance, nor determine the outcome of the decision to refer.

The Designated Safeguarding Lead will use the LSCP's Thresholds: A Continuum of Help & Support tool (London Child Protection Procedures) to help decide on the best course of action when a concern is raised about a child.

10.1 Referral

As soon as concern exists that a child may be at risk of significant harm, the Designated Safeguarding Lead will make a referral to the school's Local Authority children's services duty or referral and assessment team within 24 hours. If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to social services within 24 hours. If no response or acknowledgement is received within 24 hours, the Designated Safeguarding Lead will contact social services again.

The local authority will make a decision about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

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The school is located in the City of Westminster. Contact details for the Local Authority are as follows.:

If you are worried that a child or young person is at immediate risk, please contact the assessment and access team immediately on 020 7641 4000: (out of hours: 020 7641 6000)

Email: AccesstoChildrensServices@westminster.gov.uk

Aqualma Daniel – Local Authority Designated Officer (LADO): 07870 481712
Aqualma.Daniel@rbkc.gov.uk

Kiran Malik – Prevent Programme Manager: 020 7641 5071
kmalik@westminster.gov.uk

The London Safeguarding Children Partnership (LSCP) website contains the latest London Child Protection Procedures

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If a referral is not considered appropriate, the Designated Safeguarding Lead will make full written records of the information that they have received detailing the reasons for the judgement that the matter did not need to be referred to the Local Authority.

When a referral is not deemed necessary, the individual with concerns and/or the Designated Safeguarding Lead should monitor the situation. If the child's situation does not appear to be improving the referrer should press for reconsideration. Please see Halcyon Safeguarding Protocols to see a simplified flowchart of the decision-making process.

10.2 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Speak to the DSL first, to agree on a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the Deputy DSL, or a member of the School Leadership Team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Share any action taken with the DSL as soon as possible.

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Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting 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.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

10.3 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the Deputy DSL or a member of the School Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Prevent, who may make a referral to Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

10.4 Mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

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If you have a concern about the mental health of a child *that is also a safeguarding concern*, take immediate action by following the steps outlined in 10.2 above.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

The government guidance, Mental health and behaviour in schools provides more information.

10.5 Students with special educational needs, disabilities or health Issues

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- the potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges

We offer extra support for these pupils. This includes

- sharing key information with staff on a need-to-know basis
- creating a specific learning or medical or social plan, where appropriate
- specific interventions from the Wellbeing Team
- specific curriculum accommodations
- access to internal counselling services
- coaching support through the School's mentor programme

10.6 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

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- appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- the DSL has details of children's social workers and relevant virtual school heads
- the Student Wellbeing Support teacher will take the lead on promoting the educational achievement of looked-after and previously looked-after children. As part of their role, they will:
  - work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
  - work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

10.7 Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- responding to unauthorised absence or missing education where there are known safeguarding risks
- the provision of wellbeing and/or academic support

11. Mandatory Reporting Duty for Teachers

If a teacher has either been told by a girl (under the age of 18) that she has had FGM or has observed a physical sign appearing to show that a girl has had FGM, they <u>must</u> report the matter to the police by calling 101. Teachers failing to report such cases will face disciplinary sanctions.

Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's Designated Safeguarding Lead and involve Children's Services as appropriate.

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12. The role of parents and carers

If it is safe to do so, Halcyon will inform parents if the school intends to inform the Local Authority of its concerns about a student's welfare. Any information provided by parents at this stage will form part of the school's evidence base that will be passed on to the Local Authority. However, the parents' evidence will not influence Halcyon's decision to contact the Local Authority, which is the final arbiter in the matter.

13. Concerns and allegations against staff, volunteers and students

Halcyon has procedures for dealing with concerns and allegations against staff and volunteers who work with children. These aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the DfE guidance in *Keeping Children Safe in Education (Part 4. Allegations of abuse made against teachers and other staff) (September 2022)* and should be used where the member of staff or volunteer has:
- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

Where an **allegation is made against any member of staff or a volunteer**, the matter should be reported immediately to the Designated Safeguarding Lead who will inform the Director. Evidence will be collected in the normal way and then reported to the LADO within 24 hours for advice on how to proceed.

If a staff member has a concern, or receives an allegation, about an incident relating to an individual or organisation *external to Halcyon* using our school premises for an activity for children, the matter should be reported immediately to the Designated Safeguarding Lead who will inform the Director. Evidence will be collected in the normal way and then reported to the LADO within 24 hours for advice on how to proceed.

13.1 Low-Level Concerns
This is defined as a 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 this Staff Code of Conduct, including inappropriate conduct outside of work; and

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- does not meet the harm threshold or is otherwise not 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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Low-level concerns should be shared with the DSL, or Deputy DSL, or with the Director or another member of the SLT team.

13.2 Allegations against the Director
The person receiving the allegation should immediately inform the Chair of the Board Trustees/Board Designated Safeguarding Lead), without first notifying the Director. Any such allegation will be discussed with the LADO before further action is taken.

13.3 Allegations against the Designated Safeguarding Lead
Will be dealt with by the Director and Board Designated Safeguarding Lead following the normal procedures.

13.4 Allegations against a member of the Board
The person receiving the allegation should immediately inform the Designated Safeguarding Lead/Director. Any such allegation will be discussed with the LADO before further action is taken.

13.5 Whistleblowing
All staff are required to report any concerns or allegations about school practices or the behaviour of colleagues that are likely to put students at risk of abuse or other serious harm as well as more general concerns which may not immediately seem "serious" enough to constitute a formal "allegation". There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally: 0800 028 0285 / help@nspcc.org.uk

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In a situation wherein the School considers that the behaviour of a staff member could possibly place a child at risk of harm, they reserve the right to suspend that member of staff pending an investigation.

13.6 Reporting to the Disclosure and Barring Service

If Halcyon disciplines, dismisses, or has someone currently under investigation (or has someone who leaves prior to the end of an investigation) for causing emotional, psychological, physical or sexual harm, neglect or risk of harm to children, the Disclosure and Barring Service will be informed as early as possible. This will normally be in tandem with the disclosure made by Halcyon to the Local Authority.

13.7 Complaints and concerns about school safeguarding policies

If any member of the community has a concern about this policy, then this should be addressed through our Complaints Policy.

13.8 Allegations against students, or child-on-child abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. While we recognise the gendered nature of child-on-child abuse, all child-on-child abuse is unacceptable and will be taken seriously. (please see child-on-child abuse, above). Abuse in intimate relationships between children is sometimes known as 'teenage relationship abuse'.

Most cases of students hurting other students will be dealt with under our school's wellbeing or behaviour policies, but this safeguarding and promoting welfare of children policy will apply to any allegations that raise *safeguarding concerns.* This might include where the alleged behaviour

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Allegations against students should be reported immediately to the Designated Safeguarding Lead.

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13.9 Procedures for dealing with allegations of child-on-child abuse

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will follow-up, as necessary, and may
    - contact the local authority children's social care team and follow its advice as well as the police if the allegation involves a potential criminal offence
    - put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
    - contact the children and adolescent mental health services (CAMHS), if appropriate
- The Student Wellbeing Team will provide interventions in school as appropriate. This may include, for example, internal or external counselling services; changes to classes or classrooms; restorative mediation services.

13.10 Procedures for dealing with the sharing of nudes and semi-nudes ('sexting')

A. **Staff responsibilities when responding to an incident**
If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- ask the student(s) who are involved in the incident to disclose information regarding the imagery. The DSL, Deputy DSL or Student Wellbeing Leader will take this responsibility
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

B. **Initial review meeting**

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Following a report of an incident, the DSL will hold an initial review meeting with the Student Wellbeing Leader, and other appropriate staff – this may include the staff member who reported the incident and the Wellbeing or Leadership team. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to students(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the images or videos is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Director and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in the Safeguarding Log.

C. **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

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They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

D. Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

E. Referring to the police

If it is necessary, the incident will be referred to the police.

F. Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded in the Safeguarding Log

G. Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE and RSHE programmes, which incorporate E-Safety. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy, on the sharing of nudes and semi-nudes, is also shared with students so they are aware of the processes the school will follow in the event of an incident.

14. Records

A. Reported matters
No one person within a school can be expected to have the full picture of a child's circumstances. To overcome this, Halcyon has a single, comprehensive, detailed, accurate

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and secure system of reported matters, which is maintained and monitored by the Designated Safeguarding Lead and the Board Designated Safeguarding Lead to enable patterns to be spotted.

B. Student information records

Halcyon recognises the importance of keeping up-to-date and accurate information about students and so will regularly ask all parents and carers to provide the following information and to notify the school of any changes that occur. This information is treated as confidential, although shared (as appropriate) with relevant staff:

I. names and contact details of persons with whom the student normally lives
II. names and contact details of all persons with parental responsibility
III. details of TWO emergency contacts
IV. details of those persons authorised to collect the child from school (if different from above)
V. any relevant court orders in place including those that affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions, etc.)
VI. name and contact details of the student's GP
VII. medical and other needs
VIII. any other factors which may impact on the safety and welfare of the student.

15. Adults working with children: Safer Recruitment

Halcyon practises safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the *Education (Independent School Standards) (England) Regulations 2014* and the latest statutory guidance including the Section 128 directive and the requirement for EEA regulatory body checks through the Teaching Regulation Agency. Key points of Halcyon's recruitment policy are summarised below, please see Halcyon's Recruitment Policy and Procedures for full details.

Where staff from another organisation are working with Halcyon students on another site, written assurances that the required child protection checks have been undertaken are required by Halcyon in advance.

Any tutors or support teachers, will be engaged by bona fide agencies, who themselves undergo statutory requirements for vetting staff, and documents will be verified by Halcyon.

Supply teachers and teachers offering after-school activities will undergo Halcyon's requirements for vetting staff.

The checks include:

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A. ID check, including eligibility to work check
B. Enhanced DBS check with a barred list check (a separate barred list check to be made, if required)
C. a teaching/management prohibition order check, including Section 128 check
D. professional qualifications check, including a Teaching Regulations Agency check for QTS (where applicable)
E. If a candidate has lived overseas for more than three months, the candidate will be asked to present an overseas Police Check/Certificate of Good Conduct from the relevant country. Where this is not possible, further checks may be carried out, for instance extra references may be obtained.
F. Individual safeguarding interview
G. medical fitness check
H. two written references and a CV; checked and dated. Referees are asked specifically whether the applicant has been the subject of any safeguarding concerns.

A record of the checks is kept in accordance with the Data Protection Act 2018 and contained securely in Halcyon's single central register which can be verified by reference to staff personnel files. All staff will be interviewed prior to appointment and the interview panel will include at least one person who has received training in safer recruitment. The interview process includes specific safeguarding questions exploring applicants' attitudes towards safeguarding and their understanding of current statutory requirements and best practice.

16. Adults in the building: Safer Recruitment

Halcyon shares its site with West London Synagogue (WLS), who also provide educational programmes for children. Permanent scheduled, regular employees of WLS, and permanent, scheduled, regular agency staff contracted by WLS, are required to have statutory child safeguarding and DBS checks. WLS is required to provide the school with written assurance that these checks have been undertaken, and the names, dates of birth and DBS reference numbers will be included in Halcyon's central register of staff, along with overseas police checks as required. All other adults who may occasionally work at, or visit, the site, and have any access to the Halcyon, are supervised at all times while on the premises.

17. Shared Use Building

WLS has its own safeguarding policy which can be found on the Synagogue's website (https://www.wls.org.uk/). Should any concerns about anyone connected to WLS be reported to the school, they should be referred on to the WLS's Safeguarding Lead immediately or within 24 hours. Olga Crosse is WLS's Safeguarding Lead: olga.crosse@wls.org.uk.

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18. Children staying with host families

In situations where children might be provided with care and accommodation by a host family to whom they are not related, this may be – depending on each circumstance – a regulated or unregulated activity.

If the hosting is considered to be "private fostering" under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both, and the School has the power to terminate the arrangement, then this would be considered a regulated activity for the purposes of the Safeguarding Vulnerable Groups Act 2006. Where the School is the regulated activity provider, it will request a DBS enhanced check (which will include barred list information) from all adult members of the household to determine their suitability for the arrangement.

However, where the parents make the arrangements themselves, this will be a private matter between the child's parents and the host parents and in these circumstances this will not be considered a regulated activity and the School will therefore not be the regulated activity provider.

19. Work Experience

The School's work experience leader should
- A. ensure that the placement provider has policies and procedures in place to protect children from harm
- B. ensure the employer offers a safe, appropriate environment for Halcyon students
- C. provide the employer with information about how safeguarding concerns should be dealt with during the period of the placement, including sharing the contact details of the designated safeguarding person

In addition
- D. Work experience providers are not required to carry out enhanced Disclosure and Barring Service (DBS) checks on employers/staff supervising young people aged 16 to 17 on work experience.
- E. If, during work experience a particular person is unsupervised and in frequent contact with a child, then this is likely to be a regulated activity. In these cases, the School's work experience leader should ask the employer to ensure that this person is not on the barred list.
- F. should a Halcyon student over the age of 16 intend to undertake work experience in the healthcare and education sectors - with regular contact with children - then the work experience leader will ask the student to complete an enhanced DBS check before starting on their placement.

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20. Monitoring and review

The Designated Safeguarding Lead continually monitors Halcyon's child protection and safeguarding practices and brings to the notice of the Board of Trustees any weaknesses or deficiencies. The Board of Trustees, through the Director, has a duty to remedy any weaknesses that are identified without delay.

An annual report is submitted to the Board of Trustees at the first meeting of the new academic year that outlines the child protection and safeguarding work that has been undertaken during the previous academic year. Included in the report are details of:
  A. the names of staff with designated child protection responsibilities
  B. confirmation that all new staff and volunteers have been recruited safely and that a record of all staff vetting checks is up-to-date and complete
  C. the training that has been undertaken by the designated staff
  D. the training that has been undertaken by all other staff and volunteers
  E. details of any significant incidents when physical restraint of students has been used
  F. details of information and guidance that has been given to staff
  G. details of safeguarding and child protection issues included in the curriculum
  H. an outline of the filters and monitoring systems in place to ensure online safety, including evidence that over-blocking is not taking place
  I. confirmation that all child protection records are stored securely and where appropriate have been transferred to another school
  J. details of safeguarding and child protection information given to parents
  K. details of the safety of the school site and the access given to visitors
  L. confirmation that all school lettings have been agreed with consideration given to the safeguarding of children
  M. numbers of child protection referrals made to Children's Services
  N. details of child protection conferences or meetings attended regarding children (names of children are not shared)
  O. numbers of children who are, or have been, subject to a Child Protection Plan.

Following review of this report, the Board of Trustees, Director / Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead, and the Wellbeing Team will work together on, and urgently prioritise, any aspect of safeguarding and child protection that is identified as an area for development.

Approved by Board of Trustees, October 2012. Revised February 2013.
Reviewed 9 August 2013. Revised 26 November 2013. Approved January 2014.
Reviewed August 2014. Revised December 2015.

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Approved by Board of Trustees October 2016. Revised March 2017. Revised 1 September 2017. Approved by Board of Trustees 07 September 2017. Revised August 2018. Approved by the Board of Trustees, September 2018.
Revised August 2019. Approved by the Board of Trustees September 17 2019.
Revised, reviewed and approved by the Board of Trustees, September 24 2020.
Reviewed August 2021. Approved by the Board of Trustees October 7 2021.
Reviewed September 2022. Approved by the Board of Trustees September 2022
Reviewed September 2023. Approved by the Board of Trustees September 26 2023

This policy will be reviewed annually, or more regularly in light of any significant changes in statutory requirements and legislation.

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Appendix 1. Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (September 2023)

Appendix 2. The Role of the Designated Safeguarding Lead (Job Description)

Halcyon has designated an appropriate senior member of staff to take lead responsibility for safeguarding and child protection. This person has the status and authority within the school to fulfil their role and is given the time, funding, training, resources and support to carry out the duties of the post.

Halcyon also has a Deputy Designated Safeguarding Lead who is trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding Lead can be delegated to the Designated Safeguarding Lead, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Lead and will not be delegated.

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

Managing referrals
A. Refer all cases of suspected abuse to Local Authority children's social care as required;
B. Support staff who make referrals to Local Authority children's social care;
C. Refer cases to the Channel programme where there is a radicalisation concern as required;
D. Support staff who make referrals to the Channel programme;
E. Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
F. Refer cases where a crime may have been committed to the Police as required.

Work with others
G. Liaise with the Director to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
H. As required, liaise with the "case manager" (as per *Keeping Children Safe in Education Part four: Allegations of abuse made against teachers and other staff*) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
I. Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies; and
J. Act as a source of support, advice and expertise for staff.

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Training

K. Undergo relevant training, updated at least every two years, to understand and keep up with developments relevant to the role;

L. Undertake Prevent awareness training (mandatory for Designated Safeguarding Lead);

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

N. In addition to formal training, ensure that own knowledge and skills are refreshed (eg: via e-bulletins, meeting other Designated Safeguarding Leads, or reading about safeguarding developments) at regular intervals, but at least annually;

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

P. Have a working knowledge of how Local Authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

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

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

S. Be able to keep detailed, accurate, secure written records of concerns and referrals;

T. Understand and support Halcyon with regards to the requirements of the Prevent duty;

U. Provide advice and support to staff on protecting children from the risk of radicalization; and

V. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures Halcyon may put in place to protect them.

Raising Awareness

W. Ensure Halcyon's child protection policies are known, understood and used appropriately;

X. Ensure Halcyon's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board of Trustees regarding this;

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

Z. Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

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Child Protection File

AA. Where students leave Halcyon, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

BB. During term-time, the Designated Safeguarding Lead (or Deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The Designated Safeguarding Lead (or Deputy) is expected to be available in person, but in exceptional circumstances availability via phone, Google Hangout or Skype is acceptable.

Appendix 3. What to do if you're worried a child is being abused – Advice for practitioners (March 2015)

Appendix 4: Allegations of abuse made against Staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

● 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 he or she may pose a risk of harm to children; and/or
● 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.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and 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. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives 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

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

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 which supports the allegation being made

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Procedure for dealing with allegations

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

- 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
- 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 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)
- 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 children's social care services, where necessary). Where the police and/or 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
- 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 children's social care services, as appropriate
- 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 children's social care

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

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

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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

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 children's social care services as appropriate

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. The HR and Compliance Manager will provide the individual with a range of support options.

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 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

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)

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

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.

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 substitute 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 Director or HR and Compliance Manager 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. These are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

- 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

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 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 children's social care may be appropriate.

If a report is 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 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

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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 children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the 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 which 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 local authority's designated officer 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

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- 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.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- suspicion
- complaint
- disclosure made by a child, parent or other adult within or outside the school
- pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – 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, **and**
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- being overly friendly with children
- having favourites

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- 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
- using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed 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

Responding to low-level concerns

If the concern is raised via a third party, the Director 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 Director will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct.

The regular review of logs - attendance, academic, wellbeing, medical, field trips, major incident, health and safety, safeguarding - by the DSL and/or the Wellbeing Team and/or Director and/or the curriculum coordinators, ensure that 'low-level' concerns will be discussed and contextualised, and identified if they constitute patterns of behaviour

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Record keeping

All low-level concerns will be recorded in writing. 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 and comply with the DPA 2018 and 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 harms threshold as described in section 1 of this appendix, 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 which would ordinarily be included in a reference, such as misconduct or poor performance

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