

Safeguarding and Child Protection Policy

King's College London
Mathematics School

Monitoring and Review

	Name	Date	Role
Reviewed	Obehi Orukpe	27/08/2025	AH (PDBW)
Ratified	Education Committee & Governing Body	Autumn 2025	Governors
Next review	Education Committee & Governing Body	Autumn 2026	Governors

The **Designated Safeguarding Lead** is: **Obehi Orukpe (Assistant Headteacher)**

The **Deputy Designated Safeguarding Lead** is: **Timothy Bateup (Head Teacher)**

The **Deputy Designated Safeguarding Lead for Outreach** is: **Elliot Francis-Hewett (Director of Outreach and Widening Participation (Maternity Cover))**

The **Chair of Governors** is: **David Benello**

The **Governor for safeguarding children** is: **Margaret Peacock**

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1. Introduction

Safeguarding and promoting the welfare of children is defined for statutory purposes as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment; whether that is within or outside the home, including online
- 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 have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video. See Appendix 1b for guidance on youth-produced sexual imagery.

The core safeguarding principles of King's College London Mathematics School (hereafter 'KCLMS') are:

- This policy applies to every individual working for the KCLMS irrespective of their status or position. It therefore includes the Governors, the Head Teacher, members of the Senior Leadership Team, Lead Teachers, tutors, teachers, employees, consultants, contractors, trainees, volunteers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "Staff" in this policy). This policy also applies to any member of staff seconded to KCLMS from another institution, if his or her role at KCLMS is equivalent to that of a full- or part-time KCLMS employee
- Children who feel safe are happier, more emotionally secure and are more likely to achieve their potential.
- Students, staff, parents and governors will be involved in the development and review of policy, processes and implementation.
- The Governing Body will review this document annually unless events mean this must be reviewed more frequently.
- We believe that KCLMS should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual student.
- Deliberately, sometimes this policy refers to the students at KCLMS as "children" in line with the definition of 'children' provided by Keeping Children Safe in Education (September 2025) which defines 'children' as being anyone under the age of 18. For school purposes we regard

ALL our students as children and the difference is which social services they may require. This terminology reinforces the obligations that all adults (whether employed by, volunteering in or in other ways associated with KCLMS) have to safeguard and promote the welfare of KCLMS's students.

- The following 3 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)
 - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - The chief officer of police for a police area in the LA area
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2. Key staff

The Designated Safeguarding Lead is Obehi Orukpe, Assistant Head (PDBW), kclms-safeguarding@kcl.ac.uk

The Deputy Safeguarding Lead is Timothy Bateup, Head Teacher,

The Deputy Safeguarding Lead for Outreach is Elliot Francis-Hewitt, Acting Director of Outreach, kclmsoutreach@kcl.ac.uk

The Safeguarding Governor is Margaret Peacock, who can be contacted via the Clerk to the Governing Body (Rebecca Barrett, Rebecca.Barrett@kcl.ac.uk).

This policy has been authorised by the Governing Body, is addressed to all staff and volunteers and is available on request and is published on the KCLMS website. It is a whole-school policy and applies wherever staff, Governors or volunteers are working with students, even where this is away from the school, for example on an educational visit.

3. Legal Framework

KCLMS is aware of its obligation to make arrangements to safeguard and promote the welfare of students at the school as set out in Sections 157 and 175(2) of the Education Act 2002. This policy has been developed having regard to the following guidance and advice:

[Keeping Children Safe in Education](#) (September 2025) (**KCSIE**)

[Working together to Safeguard Children](#) (December 2023)

Covid-19 Safeguarding in schools, colleges and other providers (May 2020)

Schools COVID-19 operational guidance (August 2021)

Prevent Duty Guidance for England and Wales (March 2015, updated 2023)

Channel Duty Guidance: Protecting people susceptible to radicalisation (2023)

Multi-agency statutory guidance on FGM (2016, updated July 2020)

Children Missing Education (2016)

What to do if you're worried a child is being abused: advice for practitioners (2015); and

Information sharing: advice for practitioners providing safeguarding services (2015).

As well as;

[The Children Act 1989](#) (and [2004 amendment](#)), 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

[The Human Rights Act 1998](#), which explains that 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 individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty](#) (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

In addition, it is consistent with the safeguarding procedures for Lambeth and the London local Safeguarding Children Partnerships. KCLMS will work with the Lambeth Schools Safeguarding team and Local Authority Designated Officer (LADO) via the Lambeth Integrated Referral Hub, making referrals when necessary and attending and contributing to multi-agency meetings, child protection case conferences and child protection review conferences when required to do so. With a catchment area beyond Lambeth, KCLMS will work with the safeguarding team within individual boroughs as required.

KCLMS is registered with the Lambeth Safeguarding Children Partnership Learning Pool who will provide us with training, and we have direct contact with the Lambeth Safeguarding Manager Schools who will provide advice and support.

It is also important that staff read this policy with reference to the more detailed guidance offered in the following policies and guidance:

- Acceptable Use of ICT Policy (staff)
- Anti-Bullying Policy
- Attendance and Punctuality Policy
- Behaviour Policy
- Positive Mental Health Policy
- Critical incident policy and procedures
- Data Protection Policy
- Educational Visits Policy and Procedures
- Fundamental British Values Policy
- Health and Safety Policy
- Missing Student Policy
- Reporting Wrongdoing Policy
- Safeguarding policy for casual staff
- Safeguarding policy for Outreach
- Safer Recruitment Policy and Procedures
- SEND Policy including SEND information report
- Staff Code of Conduct
- Substance Abuse Policy

4. Statement

Every student should feel safe and protected from any form of abuse and neglect. The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The school will:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by another organisation and volunteers) to work with children and young people. See also the *KCLMS Safer Recruitment Policy and Procedures*;
- follow the local inter-agency procedures of the Lambeth Safeguarding Children Partnership;
- be alert to signs of abuse and neglect both in the school and from outside (including online) and protect each student from any form of abuse and neglect, whether from an adult or another student;
- deal appropriately with every suspicion or allegation of abuse and neglect and support children who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- be alert to the needs of children with physical and mental health conditions;
- operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that school premises are as secure as circumstances permit;
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual students in the school or in the local area; and
- have regard to regulations and standards issued by the Secretary of State for Education in accordance with Section 94 of the *Education and Skills Act 2008* and sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and associated regulations.

5. Principles

- The child's welfare is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties.
- Victims should be taken seriously, kept safe and never be made to feel they have created a problem by reporting.

- Staff are responsible for safeguarding the welfare of children as part of their professional duties.
- All staff have an equal responsibility to act in accordance with this policy and procedures and *KCSIE*. All staff have to be alert to situations: (i) where a child might benefit from early help; or (ii) which give rise to concerns about a child; or (iii) which indicate a child is in danger or at risk of harm.
- Part 1 of *KCSIE* is provided to colleagues each school year and at the start of their employment with the school and staff will be required to confirm that they have read and understand this.
- KCLMS facilitates a whole school or college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies operate with the best interests of the child at their heart.

KCLMS is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the school's recruitment, selection and disclosure policy.

All staff and students involved in child protection issues will receive sustained and appropriate support from the DSL and Deputy DSLs, who will follow this policy's guidance and statutory guidance in doing so.

The school will work with other agencies to assess, identify, and support those children who could benefit from early help, are suffering harm or who may suffer harm without intervention. Such agencies may include the Police, Children's Social Care (CSC) and health services including CAMHS. Where requested, KCLMS will allow access for children's social care from the local authority, and will supply information, as needed, to the students' local safeguarding children's board.

'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. KCLMS is prepared to use any term the child feels most comfortable with when managing an incident. 'Alleged perpetrator(s)' and 'perpetrator(s)' are also widely used and recognised terms, but KCLMS will consider which terminology to use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. KCLMS will decide what's appropriate and which terms to use on a case-by-case basis.

6. Aims

- To ensure good practice throughout the school;
- To illustrate the school's commitment to safeguarding children and to sustain an environment where staff feel able to raise concerns; and
- To provide all staff, volunteers and governors with the required information needed to fulfil their statutory responsibilities for safeguarding.

7. Roles and Responsibilities

Role of the Governing Body

- Designate a governor to take leadership responsibility for the school's safeguarding arrangements. It is the responsibility of the governing body to review annually the safeguarding policy and effective implementation of its procedures, and to be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty (PSED) (paragraph 82).
- Receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge. This is so they can be assured that safeguarding policies and procedures are effective and support your school to deliver a robust whole school approach to safeguarding
- Appoint a Designated Safeguarding Lead (DSL). The DSL is a senior member of staff of the KCLMS leadership team with the necessary status and authority to take lead responsibility for safeguarding and child protection.
- Recognise the importance of the role of the DSL and deputies and support them; ensure the training necessary to be effective is undertaken and that they have the additional time, funding, training, resources and support needed to carry out their role effectively.
- Ensure that there are safe and effective recruitment policies, disciplinary procedures and procedures to manage any safeguarding concerns about staff members (including supply staff, volunteers and contractors) in place.
- Recognise the contribution the school can make to helping children keep safe through the teaching and encouragement of responsible attitudes to adult life through PSHE and other curriculum and co-curricular areas.
- Ensure that online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies/procedures, and that appropriate filters and monitoring systems are in place in line with the [DfE's filtering and monitoring standards](#) to safeguard children from potentially harmful and inappropriate material online which are reviewed for effectiveness and discussed with IT staff and service providers about what needs to be done to support the school to meet these standards. They must also ensure that the leadership team and relevant staff are aware of and understand the filters and monitoring systems in place, manage them effectively and know how to escalate concerns, ensure that the DSL takes lead responsibility for these systems as part of their role.
- Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners, ensuring that staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensure that the school's safeguarding arrangements take into account the procedures and practice of the Lambeth Safeguarding Children's Partnership, including understanding and reflecting local protocols for assessment and the referral threshold document; ensure that

the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns)

- Ensure that the school's Staff Code of Conduct Policy covers acceptable use of technologies, staff/student relationships and communication and staff use of social media.
- Ensure that the governing body has an effective link with the multi-agency safeguarding hub. This may be achieved through speaking on the phone to the Lambeth Senior Safeguarding Manager and establishing contact.
- Ensure that KCLMS contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans.
- Ensure that information is shared, as appropriate, with external agencies
- Ensure that the school has effective policies in place for handling complaints and allegations.
- Ensure that the school has effective responses in place to children who go missing from education, particularly on repeat occasions to help identify the risk of abuse and neglect and exploitation. Ensure, in conjunction with the DSL, that the school will hold more than one emergency contact number for each student.
- Ensure that school policy reflects that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so)
- Ensure, in conjunction with the DSL, that an appropriate member of staff with the necessary skills, knowledge and understanding is appointed, if appropriate, to look after the needs of a 'looked after' student.
- Seek assurance that where another body is providing services or activities, that they have appropriate safeguarding and child protection policies/procedures in place. This applies regardless of whether or not the children who attend these services/activities are children on the school roll/attend the college

The Governor with special responsibility for safeguarding should:

- have oversight of child protection matters;
- liaise with the local authority and/or partner agencies, as appropriate;
- instigate the Governing Body's annual review of this policy by using a safeguarding audit.

Key matters, although not exclusive, to be checked by the annual audit of safeguarding carried out by the Governing Body are:

- statutorily compliant procedures are in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children;

- that procedures are in place to handle allegations against other children;
- that safer recruitment policies, training and procedures are in place;
- that training in child protection is undertaken in accordance with the Lambeth expectations, that the DSL and deputy DSL receive refresher training every two years and that regular safeguarding and child protection updates are received at least annually;
- issues and themes which may have emerged in the school and how these have been handled;
- the contribution the school is making to multi-agency working in individual cases or local discussions on safeguarding matters.

Duty of staff, governors and volunteers

All staff, Governors and volunteers of the school are under a general legal duty to:

- protect children from abuse and neglect;
- be aware of the terms and procedures in this policy and to follow them;
- have read and understood Part 1 of *KCSIE* and, for staff in leadership positions and/or with direct contact with children, Annex A;
- attend appropriate safeguarding training;
- abide by the guidance outlined in the *Staff Code of Conduct* and other related policies referenced in this policy and the appendices. The code of conduct gives clear guidance about behaviour so as to avoid placing students or staff at risk of harm, or at risk of allegations of harm;
- be aware of the signs of abuse and neglect so that they are able to identify potential issues;
- be aware of online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- to keep a sufficient record of any concerns, discussions and decisions in accordance with this policy, principally through the school safeguarding software, CPOMS; and
- report any matters of concern to the DSL, or in their absence the DDSL, in accordance with this policy and *KCSIE*, 2025.

Designated Safeguarding Lead (DSL)

The DSL will be appointed from the senior leadership team and will take the lead responsibility for safeguarding and child protection (including online safety). This is explicit in the role holder's job description. The broad areas of responsibility for the DSL are as follows, as stipulated in *KCSIE*:

Managing referrals

- The DSL is expected to:
 - refer cases of suspected abuse to the local authority Children's Social Care as required;
 - support staff who make referrals to the local authority Children's Social Care;
 - refer cases to the Channel programme where there is a radicalisation concern as required;
 - support staff who make referrals to the Channel programme;
 - refer cases where a person is dismissed or left employment due to risk/harm to a child to the Disclosure and Barring Service as required;
 - refer cases where a crime may have been committed to the Police as required;

- ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide, developing a culture of listening to children and reducing barriers to facilitate communication; and
- manage information sharing and managing the child protection file, including the storing of and access to records and transferring of records

Work with others

- Liaise with the Head Teacher as appropriate, to inform them of safeguarding issues especially ongoing enquiries under Section 47 of the *Children Act 1989* and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult, according to the statutory guidance PACE Code C 2019.
- Liaise with the three safeguarding partners (local authority, integrated care boards and the chief police officer of the area) and work with other agencies in line with 'Working Together to safeguard Children and NSPCC – 'When to call the police'.
- As required, liaise with the Case Manager and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member).
- Liaise with the Head Teacher to ensure that staff safeguarding and child protection training is completed by all members of staff at appropriate intervals, including online safety training.
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Lead, monitor and cultivate the school culture so staff feel comfortable discussing safeguarding matters in and outside of work, including online.

Training requirements

The DSLs and Deputy DSL will receive training to provide them with the knowledge and skills required to carry out the role. This training, which includes Prevent awareness training, will be carried out every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- 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;
- have a working knowledge of locally agreed procedures for child protection and inter-agency working, in particular 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;
- ensure each member of staff has access to and understands the school's *Safeguarding Policy* and procedures and the *Staff Code of Conduct*, especially new and part time staff;
- are alert to and support the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate and secure written records of concerns and referrals;
- understand and support the school with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting students from the risk of radicalisation;

- have responsibility for online safety in the school and therefore have a good understanding of the filtering and monitoring systems and processes in place at KCLMS
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures KCLMS may put in place to protect them; and
- facilitate the regular safeguarding training of all staff, including online safety, and ensure that children are taught about safeguarding, including online safety.

Raising awareness

- The DSL should ensure the school's safeguarding and child protection policies are known, understood and used appropriately;
- Ensure this policy is reviewed annually (as a minimum) and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures and national statutory requirements and guidance, and work with the Governing Body regarding this;
- Ensure this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made, recognising the role of the school in this process; and
- Link with the Lambeth Safeguarding Children Partnership (LSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Ensure that the systems in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback

Child protection file

- Where children leave the school before the end of Year 13, ensure their child protection file is copied for any new school or sixth form college as soon as possible but transferred separately from the main student file, ensuring secure transit and that confirmation of receipt is obtained.

Extremism and Radicalisation

In accordance with the *Prevent Duty Guidance for England and Wales (March 2015)* and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)* the Designated Safeguarding Lead has, in addition, the following responsibilities:

- Acting as the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
- Co-ordinating Prevent duty procedures in the school;
- Liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;

- Undergoing training through Workshops to Raise Awareness of Prevent (WRAP) or other appropriate training;
- Maintaining an ongoing training programme for all school employees via the weekly internal staff professional development sessions, induction training for all new employees and keeping records of staff training; and
- Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

Deputy DSL

If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSLs. The Deputy DSL has also undertaken training to provide them with the knowledge and skills required to carry out the role. In this policy, reference to the DSL includes the deputy DSLs where the DSL is unavailable.

Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

8. Safer Recruitment, including volunteers

The school is committed to safer recruitment and the school's HR department is responsible for implementing these practices, including the use of birth certificates to check an individual's identity. KCLMS will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process. See the KCLMS Safer Recruitment Policy and Procedures for details.

KCLMS will not include any repeated concerns or allegations that have all been found to be false, unfounded, unsubstantiated or malicious in a reference.

9. Guidelines for good practice

To meet the responsibilities towards children, all staff are expected to:

- read and understand the KCLMS *Safeguarding Policy*, the *Behaviour Policy*, the *Staff Code of Conduct*, the *Anti-Bullying Policy*, the *Acceptable Use of ICT for Students and Staff Policy*, the *First Aid Policy* and the *Missing Student Policy*.
- treat all students with respect;
- set a good example by conducting ourselves appropriately;

- involve students in decision-making which affects them;
- encourage positive and safe behaviour among students;
- be alert to changes in student's behaviour and maintain an attitude of 'it could happen here' where safeguarding is concerned;
- recognise that challenging behaviour may be an indicator of abuse;
- encourage and maintain appropriate standards of conversation and interaction with and between students, avoiding and discouraging the use of inappropriate sexualised or derogatory language;
- be aware of the risks of child-on-child abuse;
- be aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of neglect and/or abuse;
- be a good listener; and
- ask the student's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during Sport, or administering first aid.

10. Multi-Agency Working

KCLMS will ensure that the school contributes to multi-agency working in line with statutory guidance 'Working Together to Safeguard Children'.

The three safeguarding partners will make arrangements to work together by setting out relevant named agencies to safeguard and promote the welfare of children and responding to needs.

The safeguarding partners are the local authority, integrated care boards and the chief police officer of the area.

The three partners will make arrangements to allow all schools (including those in multi-academy trusts) and colleges to be fully engaged, involved and included in safeguarding arrangements. Schools and colleges are under a statutory duty to co-operate with the published arrangements if named as a relevant agency.

11. Vulnerable Children

Some children may be at increased risk of significant harm, both online and offline, as a result of neglect and/or physical, sexual or emotional abuse. (See Appendix 1 for details about the types and signs of abuse.) Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

KCLMS also recognises that children may not be at risk of significant harm but are in need of additional support for one or more agencies. All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help.

To ensure that all of our students receive equal protection, we will give special consideration and attention to any student who is:

- showing signs of abuse/neglect;
- disabled or have special educational needs and/or disabilities (SEND) or health conditions;
- living in an identified domestic abuse situation;
- a young carer;
- showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
- affected by a parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- an asylum seeker;
- living away from home;
- are missing or absent from education for prolonged periods and/or repeat occasions
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation or where there are issues of substance abuse or domestic violence;
- at risk of female genital mutilation (FGM), sexual exploitation, forced marriage or radicalisation
- living a transient lifestyle;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- has English as an additional language (EAL);
- are missing or absent from education for prolonged periods and/or repeat occasions
- is a 'looked after' child (LAC) or a child in care or who has returned home to his/her family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care (see section 13).

Special consideration and attention include monitoring through the pastoral systems of the school.

At KCLMS this is achieved through:

- the tutor system and tutor group meetings led by the Lead Teacher (year group);
- the Lead Teacher (year group) and Assistant Head Teacher (Personal Development, Behaviour and Welfare) weekly meetings;
- secure notes;
- agenda item for welfare and safeguarding issues at weekly whole staff briefings and SLT meetings;
- Safeguarding records;
- regular safeguarding team meetings attended by the DSL, DDSL, Lead Teacher (year group) and SENCO where the welfare of students of concern or in need is actively monitored and decisions are made on actions to take (including managing referrals), support mechanisms and record-keeping; and

- school counsellors are also involved to support a child where this is deemed to be appropriate, and the DSL liaises with the counselling service regarding involvement of outside support agencies e.g. CAMHS.

It is the role of the Assistant Head (PDBW) who is also the DSL to promote the educational achievement of any child who is 'looked after' or who is otherwise considered in need of such support. They will be provided with all necessary information, including: the student's status, up-to-date assessment information from the relevant Local Authority, the most recent care plan, contact arrangements with parents, care arrangements and delegated authority to carers.

Any concerns should be reported in accordance with the procedures set out below. Consideration of the appropriate action to take will be in accordance with the Lambeth Safeguarding Children Partnership threshold document. The school understands that providing early help is more effective in promoting the welfare of children than reacting later.

12. Children who have a Child in Need or a Child Protection Plan

A student's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. These children may require a social worker due to safeguarding and welfare needs.

The DSL will hold information of students who have a plan so that decision can be made in the best interest of the child's safety, welfare and educational outcomes.

13. Looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Our Governing Body will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. Previously looked after children remain vulnerable, therefore the school will ensure that it works together with other agencies to keep them safe.

Our designated teacher for looked after children is: Obehi Orukpe, kclms-safeguarding@kcl.ac.uk
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The designated teacher has responsibility for promoting the education achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

We will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Virtual school head receive pupil premium plus additional funding based on the latest published numbers of children looked after in the authority. The designated teacher for looked after children

will work with the virtual school head to discuss how that funding can be best used to support the progress of looked after children and meet the needs identified in the child's personal education.

14. Training

All training will be carried out in accordance with Lambeth Safeguarding Children Partnership procedures. This training will be updated regularly and is in line with advice from the three Safeguarding Partners.

New staff, as well as governors, will receive induction training on appointment, overseen by the DSL that includes:

- the contents of this policy
- the guidance in the *Prevent Duty Guidance for England and Wales (March 2015)*
- the *Staff Code of Conduct, including acceptable use of ICT policies*, and the *Reporting Wrongdoing at Work Policy*
- the *Behaviour Policy*
- the *Missing Student Policy*
- identification and role of the DSL and deputy DSL
- Part 1 or , where appropriate, Annex A of *KCSIE*
- Online Safety training

All staff will receive a copy of this policy and Part 1 of *KCSIE* and will be required to confirm that they have read and understand these.

Casual, temporary and volunteer staff are briefed by the DSL and receive the KCLMS Safeguarding Policy for Casual Staff, Part 1 of the *KCSIE* and the *Staff Code of Conduct* for which they provide written confirmation that they have read and understood. They are signposted to the full KCLMS Safeguarding Policy for reference kept both on the school website and at the school office.

All staff will undergo safeguarding training, which will include training as advised in the *Prevent Duty 2015*, as required by the Lambeth Safeguarding Children Partnership, either by a qualified external trainer or using an online training platform. In addition, all staff members will receive safeguarding and child protection updates via e-mail and staff meetings on a regular basis and at least annually. Training for all staff will include online safety and provide an outline of the expectations, roles and responsibilities in relation to filtering and monitoring.

The DSL will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health.

The DSL and deputy DSL will update their training, included a more thorough level of *Prevent Duty* training, every 2 years at level 3 standard. Their knowledge and skills will also be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. In addition, record of all training will be maintained by the DSL including members of the SLT who have received Safer Recruitment training.

The Safeguarding Governor, Chair of Governors and Vice Chair of Governors will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

KCLMS has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills and knowledge to safeguard students effectively, including questionnaires, staff meetings, professional development reviews.

Students will be made aware of child protection and safeguarding, including topics referred to in the Prevent Duty 2023, through the curriculum and Personal Development lessons including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, and providing information about who they should turn to for help. See the KCLMS Safeguarding Policy for Outreach for school requirements for student volunteers and assistants.

15. School premises

The school will take all practicable steps to ensure that school premises are as secure as circumstances permit. Staff and DBS-checked visitors (e.g. governors, PhD students) wear grey lanyards at all times. General visitors (e.g. parents, contractors, KCL maintenance) will be provided with a green coloured lanyard with their visitor badge. Students wear yellow lanyards at all times. Visitors are to report to the Main Reception where they are to sign in. They will be given a visitor badge which they are to wear throughout their visit and will be asked to await collection or given further instruction. The use of grey, yellow and green lanyards enables students, DBS checked staff and other visitors to be distinguished.

No visitor is to enter a building during term-time without an escort.

During school events, such as parent/carer evenings and open days, visitors will not sign in but be guided to the appropriate areas and not allowed unsupervised access to buildings.

If a visitor wishes to see a student, then the visitor should be directed to reception and the appropriate teacher called.

Where possible, members of staff are asked to inform the reception of expected visitors in advance following the guidance in the Visitors Flow.

Visitors without badges on the school site or badged and unaccompanied in a building should be politely challenged by members of staff.

See also the school's policy on Visiting Speakers at the end of this policy.

Organisations and individuals, such as community groups, sports associations and service providers that run community or extra-curricular activities, may hire or rent KCLMS facilities for non-school or college-related activities. It is the responsibility of the DSL and the Governing body to ensure that these organisations and individuals have appropriate arrangements in place to safeguard children and young people.

16. Cyber Safety

Mobile devices and computers are a source of education, communication and entertainment. However, we know that some adults and young people may use these technologies to harm children. The harm might range from sending hurtful or abusive texts, messages and emails, to enticing children to engage in sexually harmful conversations online, webcam filming, photography

or face-to-face meetings. These technologies may also be used by those who wish to radicalise vulnerable children for their violent purposes.

The safe use of technology is a focus in all areas of the curriculum and students receive guidance on cyber safety through our Personal Development programme including how to evaluate what they see online, how to identify risks, and how and when to seek support. Cyber-bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Please refer to KCLMS's *Acceptable Use of ICT Policy* and the *Anti-Bullying Policy* and *Behaviour Policy*, as well as the *Staff Code of Conduct* for further information. These policies, as well as the *Safeguarding Policy*, reflect the non-statutory guidance offered in *The Use of Social Media for Online Radicalisation (July 2015)* and *Education for a Connected World (Feb 2018)*.

We 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.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems detailed in the Prevent Self-Assessment) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of ICT for both staff and students in separate policies which must be read and signed annually following updates
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

KCLMS recognises that new technologies, including generative artificial intelligence (AI), present both opportunities for learning and new safeguarding risks. Staff and students must be alert to the potential misuse of AI for generating harmful, inappropriate, or misleading content (e.g. misinformation, disinformation or deepfake material). The school will ensure that filtering and monitoring systems are regularly reviewed to respond to these emerging risks in line with the DfE's *Generative AI: Product Safety Expectations*. Students will be taught how to critically evaluate digital content, including AI-generated material, through the Personal Development curriculum.

KCLMS reviews the child protection and safeguarding policy, including online safety, annually, and to makes sure the procedures and implementation are reviewed regularly.

17. Children who are absent from education and Missing Children

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. All staff should be aware of the KCLMS procedures which are used for searching for and reporting any student missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing.

Please see the school's separate *Missing Student Policy* for further details.

The school shall inform the applicable local authority (within which the student resides when not at the school) of any student who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend the school and no longer live within reasonable distance of the school;
- are in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning at the end of that period;
- have been permanently excluded; or
- have been withdrawn from the school and we are unable to confirm the name of their new school.

When a parent or carer has expressed their intention to remove a student from school to education at home, the school will work with local authorities and other relevant professionals work together to coordinate a meeting with parents and carers to ensure that the interests of the child have been considered; particularly if the child has SEND, is vulnerable and/or has a social worker.

The school shall inform the applicable local authority (within which the student resides when not at the school) of any student who is going to be added to or deleted from the KCLMS's admission register at non-standard transition points in accordance with the requirements set out in regulation 9 of the School Attendance (Pupil Registration) (England) Regulations 2024

This will assist the local authority to fulfil its duty to identify children of compulsory school age who are missing from education; and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect and exploitation or radicalisation.

The school shall inform the applicable local authority of any student who:
fails to attend school regularly; or has been absent without the school's permission for a continuous period of ten school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from the school gives rise to a concern about their welfare.

The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the student's name from the register. This will assist the local authority to:

- fulfil its duty to identify children of compulsory school age who are missing from education; and
- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

18. Action to prevent radicalisation

KCLMS recognises its responsibility to protect children and young people from being radicalised, influenced by extremist views or drawn into terrorism. All teachers will present their views or the

views of another in a balanced and non-partisan way. Teachers will also challenge, as a matter of course, any extremist opinions or discriminatory views. Students' resilience against radicalisation or extremism is developed through the close pastoral relationships between staff, students and their families, but more specifically through the school's active promotion of British Values, as appropriate in lessons, and through the Personal Development schemes of work and the assembly programme, as well as guidance on what to do if students are concerned for themselves or a friend.

Staff are trained, as part of the safeguarding training, to recognise and know how to respond to a concern. If a member of staff is anxious about extremist views or attitudes being shown by a student, (or parent) or is concerned by any other aspect of their behaviour they should report the matter to the DSL, as they would any other safeguarding concern. The DSL will consult with senior colleagues and assess the level of risk. Further action might include the DSL's liaison and referral to the appropriate government agencies and local authorities (or police) as described in the government's *Prevent Duty Guidance for England and Wales (2023)*.

The DfE 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

If a member of staff has an allegation about the behaviour and attitude of a colleague or visiting speaker, they should speak immediately to the Head Teacher, who will liaise with the DSL.

19. Listening to students

KCLMS is an open and caring community, one in which colleagues, students and parents can raise and share views on school life. We aim to listen to the student voice for matters of safeguarding, behaviour, wellbeing and school improvement through the following ways:

- Tutor groups
- Houses
- School Council
- Annual questionnaires for students and staff
- Additional questionnaires when appropriate
- Personal Development lessons
- Assemblies
- School counselling
- Safer Schools Police Officer
- Tutor 1-1s
- Anonymous student feedback form accessed by QR code

20. Teaching students about safeguarding

KCLMS recognises that it plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by:

- The KCLMS behaviour policy
- The pastoral support system
- The broad and balanced curriculum, including Personal Development lessons

The planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackles issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, abuse including child-on-child abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and female genital mutilation (FGM), and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

Online safety

Our preventative curriculum will continue to adapt to emerging online risks, including those linked to generative AI and digital manipulation (such as deepfake imagery). Students will be supported to develop digital resilience, recognise online harms and know how to report concerns. This will be reinforced by regular staff training and annual risk assessments of online threats, ensuring that safeguarding responses remain current and effective.

21. Child-on-child sexual violence and harassment

Information about child-on-child sexual violence and harassment and harmful sexual behaviour (HSB) is found in Appendix 1. This section focuses on the KCLMS response to allegations and disclosures of child-on-child abuse.

Harmful sexual behaviour (HSB) can take place both in person and online. KCLMS recognises the increasing risk posed by technology-enabled abuse, such as the creation and non-consensual sharing of sexualised AI-generated images, deepfakes or manipulated media. Such behaviours will be treated with the same seriousness as in-person abuse. Victims will be supported in line with safeguarding and child protection procedures and the school will work closely with statutory partners to manage incidents.

On Confidentiality

In relation to child-on-child sexual violence and harassment, staff shouldn't promise confidentiality as it might be in the victim's best interest to seek advice and guidance. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, there is no definitive answer. This is because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk), though with the consent of the child where possible
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority (LA) children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

On anonymity

The school should:

- Be aware of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report and any support for the children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

On discipline and the alleged perpetrator(s)

The DSL should take the lead role. The school can take disciplinary action whilst other investigations are ongoing e.g. by the police. The fact another body is investigating/has investigated an incident doesn't (in itself) prevent KCLMS from coming to its own conclusion about what happened and impose a penalty accordingly. This is a matter for the school and will be considered on a case-by-case basis.

KCLMS will consider whether:

- Taking action would prejudice an investigation and/or subsequent prosecution - liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable/irrational for you to reach your own view about what happened
- You can, and should, take disciplinary action and still provide support at the same time if necessary

On working with parents and carers

In most cases KCLMS will engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of sexual violence (this might not be necessary in relation to sexual harassment, but will be decided on a case-by-case basis). The exception is if there's reason to believe informing a parent or carer will put the child at additional risk. The DSL will think carefully about what information is provided about the other child involved, and when. KCLMS will also work with relevant agencies to ensure the approach to information sharing is consistent.

It's good practice to:

- Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress

- Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision

The DSL will attend these meetings and decide which other agencies should attend on a case-by-case basis.

On safeguarding other children

KCLMS will consider supporting children who have witnessed sexual violence, especially rape and assault by penetration, and will do all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed. The DSL will consider that social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side, and consider school transport as part of the risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s).

KCLMS recognises the importance of keeping policies, processes and curriculum constantly under review to protect all children. Reports of sexual violence and/or harassment may:

- Point to environmental/systematic problems that could be addressed by updating policies, processes and the curriculum
- Reflect wider issues in the local area

Other considerations

- It should be clear to all victims that the law on child-on-child abuse is there to protect them, not criminalise them
- The DSL should consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree to the levels for the different types of assessment as part of local arrangements
- If there are delays in the criminal process, it will be important for the DSL to work closely with the police (and other agencies as required) whilst protecting children and/or taking disciplinary measures against the alleged perpetrator(s) - this is to make sure the school's actions don't jeopardise the police investigation. The DSL should contact the police if the school has any questions about the investigation.
- Children who have experienced sexual violence can display a wide range of responses, so schools should remain alert to the possible challenges of detecting those signs and show sensitivity to their needs
- When supporting the victim, the DSL should:
 - Regularly review decisions and actions, and update relevant policies with lessons learnt;
 - Look out for potential patterns of concerning, problematic or inappropriate behaviour, and where you identify a pattern, decide on a course of action;
 - Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether extra teaching time and/or staff training could minimise the risk of it happening again.

22. Recognising abuse and potential harm

Full details on the types and signs of abuse are found in Appendix 1.

23. Procedures – what do to if you have a concern

Every complaint or suspicion of abuse or neglect from within or outside the KCLMS will be taken seriously and in accordance with this policy. **If staff are ever unsure, they must always speak to the DSL.**

A member of staff suspecting or hearing a complaint of abuse or neglect must:

- listen carefully to the child and keep an open mind. All staff should have the attitude that 'it could happen here' and should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions, that is, a question which suggests its own answer: allow the student to speak freely, and clarify rather than lead. Clearly, the age of the child and his or her ability to relay events cogently will be relevant in assessing what should be asked and how it should be asked. A good guide is to focus on WHAT happened, WHO was present, WHERE it happened, WHEN it happened (including frequency), and to avoid asking WHY questions, which encourage speculation and are hence leading questions;
- not require the student to repeat distressing details, allowing for the fact that disclosures of abuse are of their nature distressing;
- reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this policy to ensure that the correct action is taken;
- keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be made on CPOMS. If for any reason this is not possible, colleagues ought to use the *Disclosure Form* within Appendix 2.

Preserving evidence: All other evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be kept securely and passed on in accordance with the procedures set out below.

If the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, KCLMS will follow this safeguarding policy and procedure and inform the local authority designated officer (LADO), as with any safeguarding allegation.

24. Early Help

KCLMS understands that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

The school's safeguarding training includes guidance about the early help process and prepares all staff to identify students who may benefit from early help. Staff are mindful of specific safeguarding issues and those students who may face additional safeguarding challenges. See also section regarding Vulnerable Students.

Children and families may need support from a wide range of local agencies. Where a child and family would benefit from co-ordinated support from more than one agency (e.g. education, health, housing, Police), the school/college will use of an early help assessment and identify what help the child and family require to prevent their needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. KCLMS is committed to working in partnership with children, parents and other agencies to:

- identify situations in which children and/or their families would benefit from early help
- undertake an assessment of the need for early help
- provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the child's outcomes.

A member of staff or volunteer who considers that a student may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Lambeth Safeguarding Children's Partnership referral threshold document or that relevant to the student's borough of residence and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving. If the child's situation does not improve, and/or the child's parent and/or the child do not consent to an early help assessment being initiated, the DSL will make a judgement about whether, without help, the needs to the child will escalate. If so, a referral to Children's Social Care may be necessary.

25. Concerns about a student's welfare

If a member of staff is concerned about a student's welfare, the matter should be reported to the DSL as soon as possible. See the appendix at end of this policy for the procedures for dealing with allegations against staff and volunteers. 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. They may also 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 DSL.

On being notified of a concern the DSL will consider the appropriate course of action in accordance with the Lambeth Safeguarding Children Partnership referral threshold document or that relevant to the student's borough of residence. Such action may include early help or a referral to children's social care.

If it is decided that a referral is not required, the DSL will keep the matter under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

Staff are reminded that normal referral processes must be used when there are concerns about students who may be at risk of being drawn into terrorism.

In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to children's social care. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Please refer to the Flow Chart for Raising Safeguarding Concerns about a Child at KCLMS in Appendix 3

26. Students with special educational needs, disabilities or health issues

KCLMS recognises that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation 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
- Pupils 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
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

For further information on the additional pastoral support for these pupils, please refer to the *KCLMS SEND policy* and *KCLMS Medical Needs Policy*.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

27. Students who are lesbian, gay, bisexual or gender questioning

KCLMS recognises that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

KCLMS recognises that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

KCLMS will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

If a student informs a member of staff that they wish to socially transition, the AH PDBW or member of the pastoral team will meet with the student as to whether the student has informed their parents of their decision. If this has not happened, the student will be encouraged to speak with their parents in the first instance before the school can follow up further.

After this, the AH PDBW will speak with the parents of the student who wishes to socially transition to ensure they support the child's decision and understand the next steps going forward. Parents will be given an opportunity to ask questions as to how the change will affect their child's life at school.

If the student intends to be addressed by a preferred name that is different to their birth name, the school will ensure parental consent is sought first. Guidance will be offered by the AH PDBW in terms of informal and formal means of communication where the student's birth name may be used instead of their preferred name.

The school will offer in-school counselling and signposting to verified external organisations who can support students who socially transition.

28. If a child is in immediate danger or at risk of harm, including FGM

If a student is in **immediate** danger or is at risk of harm, a referral should be made to children's social care and / or the police immediately.

Anybody can make a referral in these circumstances. See the section below for details on making a referral.

If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Female Genital Mutilation (FGM):

FGM is considered child abuse and a grave violation of the human rights of girls and women. It comprises procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal to subject any child to FGM in the UK and to take a child abroad to undergo FGM.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining pupils. Any member of staff who has an FGM concern should discuss with the designated safeguarding lead who will involve children's social care as appropriate.

29. Making a referral

The relevant contact information is set out at the start of this policy. If the referral is made by telephone, this should be followed up in writing. Referrals include as much information as possible so that social care assessments can consider where children are being harmed in contexts outside the home. KCLMS recognises that a solid understanding of contextual safeguarding is pivotal in intervening and preventing child-on-child abuse in schools and colleges.

Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact Children's Social Care (CSC).

If after a referral the student's situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns are addressed and that the student's situation improves.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in CPOMS.

Referrals concerning issues highlighted in the Prevent Duty 2023, will be raised with the Prevent team at Lambeth and advice will then be sought as to the next step. This may include liaison with the relevant Channel Panel or local police contact.

30. Safeguarding concerns and allegations made about staff

All staff are required to report any concern or allegations about school practices or the behaviour of colleagues, including teachers, the Head Teacher, Governors, supply teachers, volunteers and contractors, which are likely to put students at risk of abuse or other serious harm in accordance with this policy.

Allegations against staff/volunteers will be sorted into two sections:

1. Allegations that may meet the harms threshold
2. Allegation/concerns that do not meet the harms threshold – referred to as 'low-level concerns'

Examples of low-level concerns include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child one-to-one in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils

KCLMS recognises the importance of all staff being able to report low-level concerns and has systems in place to review these concerns for patterns. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'.

Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. KCLMS has procedures in place for confidentially sharing low-level concerns and clarity around the role of the DSL and Head Teacher in this. The school reporting procedures 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 guidance in Part 4 of *KCSIE* and are set out in appendix 4. The Head Teacher is the ultimate decision-maker in respect of all low-level concerns, although they may wish to consult the DSL to take a more collaborative approach. If the Head Teacher is in any doubt as to whether a low-level concern meets the harm threshold, they will consult the local authority designated officer (LADO).

Staff and volunteers should also feel able to follow the KCLMS separate procedures to raise concerns about poor or unsafe safeguarding practices at KCLMS or potential failures by KCLMS or its staff to properly safeguard the welfare of students, and that such concerns will be taken seriously. 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. For further details of the procedures, please see the school's *Reporting Wrongdoing Policy*. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the end of this policy for the relevant contact details).

The *Complaints Policy* will be followed if a parent raises a concern about poor practice or a wrongdoing by a member of staff that does not involve the safeguarding of children.

Allegations against former staff and historical allegations: Allegations against a teacher who is no longer teaching and historical allegations should be referred directly to the Head Teacher, who will inform the Police.

Allegations against individuals where the school is not the employer: The school has the responsibility to deal with these allegations and take the lead role in any initial enquiries, liaising with the employer (e.g. supply agency) where relevant.

The school will follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

Code of conduct: Detailed guidance is given to staff to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student. This guidance is mainly held in the *Staff Code of Conduct* in the staff handbook, and covers low-level concerns, allegations against staff, and whistleblowing.

31. Allegations against students

The conduct of students towards each other will, in most instances, be covered by the KCLMS behaviour and discipline policies. However, some behaviour by a student towards another may be of such a nature that safeguarding concerns are raised.

Examples of behaviour by a student which may raise safeguarding concerns may include:

- violence, including gender-based violence;
- threatening or intimidating behaviour;
- blackmail;
- misconduct of a sexual nature, including indecent exposure or touching or serious sexual assaults;
- upskirting (which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm);
- sexting* (see the School's Acceptable Use of ICT Policy for Students and Staff policies for the KCLMS approach to sexting as well as Appendix 1b for guidance on youth-produced sexual imagery)
- encouraging others to engage in inappropriate sexual behaviour;
- any form of inappropriate behaviour by an older student towards a younger or more vulnerable student;
- bullying, including cyberbullying.

* If any devices need to be seized and passed onto the police, then the device(s) should be confiscated, and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

KCLMS takes steps to minimise the risk of child-on-child abuse. KCLMS has robust anti-bullying procedures in place (see the School's Anti-Bullying Policy) and students are taught about acceptable behaviour and how to keep themselves safe. Appropriate action is taken to protect students identified as being at risk.

Abusive behaviour by students must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual harassment is not acceptable.

Allegations against students should be reported in accordance with the procedures set out in above.

A student against whom an allegation of abuse has been made may be temporarily excluded from the school during the investigation and the KCLMS Behaviour policy will apply. The DSL will take advice from the CSC and other external agencies during the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the student or students accused of abuse. If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the CSC, parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult.

Where an allegation is made against a student, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. This will include a risk assessment of the victim's needs with an emphasis on ensuring the victim can continue their normal routines. Appropriate support will be provided to all students involved, including support from external services as necessary.

Informing parents/carers: Parents/carers will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the safeguarding board within the student's borough of residence, the CSC, the Police and/or the Head Teacher before discussing details with parents/carers. **There is no requirement to gain parental consent before a referral is made, if this is in the best interests of the child.** In all cases, the Designated Safeguarding Lead will be guided by the Lambeth Safeguarding Children Partnership referral threshold document and the CSC processes.

32. Confidentiality and information sharing

KCLMS will keep all safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The school will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes allowing relevant staff to share information without consent where there is good reason to do so and the sharing of information will enhance the safeguarding of a student in a timely manner, or to gain consent would place the student at risk. The school will maintain its safeguarding records through CPOMS software, including details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome. We will hold records in line with our records retention schedule, retaining safeguarding records relating to individual children for a reasonable period of time after they have left the school.

The school will co-operate with the Police and CSC to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the *Children Act 1989*.

Where allegations have been made against staff, KCLMS will consult with the Local Authority Designated Officer (LADO) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

- In relation to Channel referrals, the DSL will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

KCLMS will withhold providing information where the serious harm test is met. For example, in a situation where a student is in a refuge or another form of emergency accommodation.

For further information regarding confidentiality and information sharing, see the KCLMS Data Protection Policy.

33. Health and Safety and Educational Visits

The policies on Health & Safety and Educational Visits, set out in separate documents, reflect the consideration we give to the protection of students both within KCLMS's environment and when away from KCLMS when undertaking school trips and visits.

When students are placed with alternative providers or attend provision delivered by another organisation, KCLMS will seek assurance that the provider has robust safeguarding and child protection policies in place. The same safer recruitment and supervision checks required for KCLMS staff will be expected of alternative providers and the DSL will maintain oversight of safeguarding concerns arising in these settings.

34. Monitoring and review

The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The Designated Safeguarding Lead will update the Senior Leadership Team regularly on the operation of the KCLMS safeguarding arrangements.

This policy, including the online safety provisions, will be reviewed annually and in light of emerging safeguarding risks, such as those presented by advances in generative AI or other digital technologies. The Governing Body will ensure that the school uses nationally recognised tools (e.g. UKCIS online safety audit) to assess the effectiveness of online safety practice and risk management.

The governors will undertake an annual review of this policy through the Education Committee and the KCLMS safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will work with the Safeguarding Governor, preparing a written report commissioned by the full governing body.

The Education Committee of the Governing Body will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its approval. The committee should also consider independent corroboration, such as inspection of records or feedback from external agencies including the LADO. The Governing Body will review the revised policy for final approval following the Education Committee's detailed review.

The table of dates for previous monitoring and review and the next review date is at the front of this policy.

Access to forms and further information is available at <https://beta.lambeth.gov.uk/noise-nuisance-anti-social-behaviour-and-safety/report-concern-about-child>

Appendices

Appendix 1a

Child Protection – Types and signs of abuse

1 Types of abuse

- 1.1.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). A child might be abused by an adult or adults or another child or children.
- 1.1.2 Part 1 of *KCSIE* defines the following types of abuse, however, staff should be aware that abuse, neglect and exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.
- 1.1.3 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 1.1.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1.1.5 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact and / or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 1.1.6 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may

occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2 Recognising Abuse

2.1 Physical Abuse

2.1.1 Physical signs to look out for:

- Injuries which the child cannot explain, or explains unconvincingly.
- Injuries which have not been treated or treated inadequately.
- Injuries on parts of the body where accidental injury is unlikely, such as the cheeks, chest or thighs.
- Bruising which reflects hand or finger marks.
- Cigarette burns, human bite marks.
- Broken bones (particularly in children under the age of two).
- Scalds, especially those with upward splash marks where hot water has been deliberately thrown over the child, or 'tide marks' – rings on the child's arms, legs or body where the child has been made to sit or stand in very hot water.

2.1.2 Behavioural signs to look out for:

- A child who is reluctant to have his parents contacted.
- Aggressive behaviour or severe temper outbursts.
- A child who runs away or shows fear of going home.
- A child who flinches when approached or touched.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.
- Covering arms and legs even when hot.
- Depression or moods which are out of character with the child's general behaviour.
- Unnaturally compliant behaviour towards parents or carers.

2.2 Emotional Abuse

2.2.1 Physical signs to look out for:

- A failure to grow or to thrive (particularly if the child thrives when away from home).
- Sudden speech disorders.
- Delayed development, either physical or emotional.

2.2.2 Behavioural signs to look out for:

- Compulsive nervous behaviour such as hair twisting or rocking.
- An unwillingness or inability to play.
- An excessive fear of making mistakes.
- Self-harm or mutilation.
- Reluctance to have parents contacted.
- An excessive deference towards others, especially adults.
- An excessive lack of confidence.
- An excessive need for approval, attention and affection.

- An inability to cope with praise.

2.3 Sexual Abuse

2.3.1 Physical signs to look out for:

- Pain, itching, bruising or bleeding in the genital or anal areas.
- Any sexually transmitted disease.
- Recurrent genital discharge or urinary tract infections without apparent cause.
- Stomach pains or discomfort when the child is walking or sitting down.

2.3.2 Behavioural signs to look out for:

- Sudden or unexplained changes in behaviour.
- An apparent fear of someone.
- Running away from home.
- Nightmares or bed-wetting.
- Self-harm, self-mutilation or attempts at suicide.
- Abuse of drugs or other substances.
- Eating problems such as anorexia or bulimia.
- Sexualised behaviour or knowledge in young children.
- Sexual drawings or language.
- Possession of unexplained amounts of money.
- The child taking a parental role at home and functioning beyond their age level.
- The child not being allowed to have friends (particularly in adolescence).
- Alluding to secrets which they cannot reveal.
- Telling other children or adults about the abuse.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.

2.4 Neglect

2.4.1 Physical signs to look out for:

- Being constantly hungry and sometimes stealing food from others.
- Being in an unkempt state; frequently dirty or smelly.
- Loss of weight or being constantly underweight.
- Being dressed inappropriately for the weather conditions.
- Untreated medical conditions – not being taken for medical treatment for illnesses or injuries.

2.4.2 Behavioural signs to look out for:

- Being tired all the time.
- Frequently missing school or being late.
- Failing to keep hospital or medical appointments.
- Having few friends.
- Being left alone or unsupervised on a regular basis.
- Compulsive stealing or scavenging, especially of food.

2.5 Radicalisation

2.5.1 Signs to look out for:

- Emotional changes such as appearing withdrawn or depressed.

- Increase in aggression or isolation.
- Increase in online activity.
- Changes in appearance related to religious observance or group identity.
- Student is increasingly judgemental or argumentative.

The Lambeth Safeguarding Children Partnership can provide advice on the signs of abuse and the DfE advice *What to do if you're worried a child is being abused (2015)* provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

Appendix 1b

Child Protection – Specific Safeguarding issues:

KCSIE acknowledges the following as specific safeguarding issues:

- children missing from education (see section above)
- children missing from home or care
- bullying including cyberbullying
- child sexual exploitation and child criminal exploitation (see below)
- child-on-child sexual violence or harassment (see below)
- child-on-child abuse (see below)
- county lines (see below)
- domestic violence (see below)
- homelessness
- drugs
- fabricated or induced illness
- faith abuse
- honour based abuse (see below), including:
 - female genital mutilation (see below)
 - forced marriage (see below)
- gangs and youth violence
- gender-based violence / violence against women and girls (VAWG)
- hate
- mental health (see below)
- young carers (see below)
- missing children and adults strategy
- private fostering
- preventing radicalisation (see below)
- relationship abuse
- sexting
- trafficking
- upskirting
- children with special educational needs and/or disabilities
- child abduction
- cybercrime

Further definitions of specific safeguarding issues

- i. **Child sexual exploitation:** involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.
- ii. **Child-on-child sexual violence and sexual harassment**
KCLMS recognises that sexual violence and sexual harassment can occur between children of any age and sex and follows the advice in ***Sexual violence and sexual harassment between children in schools and colleges, (2018)***. It can occur through a group of children sexually assaulting or sexually harassing a group of children or a single child. Groups particularly at risk include girls, students with or perceived by peers to have SEN(D) and students who are or perceived by peers to be LGBTQ+. KCLMS makes it clear through the Behaviour policy, Anti-bullying policy and Sex and Relationship Education policy that sexual violence and harassment is never acceptable, not tolerated and not an inevitable part of growing up. We challenge behaviour such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts as dismissing these behaviours risks normalising them. This behaviour can be driven by wider societal factors beyond KCLMS and therefore these issues are tackled in the wider school through Personal Development lessons and whole school assemblies.

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive. Child-on-child sexual abuse is a form of HSB that takes place between children of any age or stage of development. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. Both the ages and stages of development of the children are critical factors, and children displaying HSB have often experienced their own abuse and trauma. It's important they're offered appropriate support. Abuse in intimate relationships between children is sometimes known as 'teenage relationship abuse'. The DSL and their deputies should have a good understanding of HSB, which could form part of their safeguarding training. If staff have any concern, they should act immediately. When there has been a report of sexual violence, the DSL or DDSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The case will be regularly reviewed to identify patterns of inappropriate behaviour. KCLMS recognises that even if there are no reports, it doesn't mean it's not happening, and will monitor/educate on an ongoing basis.

The risk and needs assessment will consider:

- the victim, especially their protection and support – the needs and wishes of the victim are paramount;
- the alleged perpetrator – a child who has displayed harmful sexual behaviour will need to be safeguarded and supported themselves; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.

Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. KCLMS discusses the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare policies. This means that the DSL is confident that they know what local specialist support is available to support all children involved (victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support. The KCLMS risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the school's approach to supporting and protecting their pupils and students and updating our own risk assessment.

If an unsubstantiated, unfounded, false or malicious report is discovered, the DSL will consider why the allegation was made as they might be in need of support.

iii. Child-on-child abuse

KCLMS has a zero-tolerance approach to child-on-child sexual violence/harassment which includes challenging inappropriate behaviours between peers. Downplaying certain behaviours between peers, such as dismissing sexual harassment as "just banter", "having a laugh" or "boys being boys" can lead to a culture of unacceptable behaviours. This can result in students normalising abuse/harassment and not reporting abuse they witness or experience. Staff are encouraged to challenge any language that they hear.

When handling disclosures of child-on-child abuse, staff will be able to reassure victims that they are safe, and their disclosures are being taken seriously. KCLMS recognises that there will be barriers to prevent students from reporting abuse and systems in place to allow students to confidently disclose their concerns. Students who report abuse should never be made to feel that they are creating a problem, nor should they ever be made to feel ashamed, or victim-blamed for their disclosures.

iv. County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas, using dedicated mobile lines or other forms of "deal line".

Exploitation is an integral part of the county lines offending model. Offenders will often use coercion, intimidation, violence, and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further education, pupil referral units, children's homes and care homes.

One of the ways of identifying potential involvement in county lines are missing episodes (home and school), when the victim may have been trafficked for the purpose of transporting drugs.

These may include increased absence from school, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts

or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

v. **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse may be, one off, series of incidents over time and range from opportunist to complex organised abuse. It can involve force and/or enticement-based methods of compliance.

Victims can be exploited even when activity appears consensual and can be facilitated and/or take place online.

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online, including part of a grooming process. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Child criminal exploitation can include being forced into moving drugs or money across the country (county lines). KCSIE Paragraph 32 contains additional information on how children can be criminally exploited explaining that the experiences of children who are being criminally exploited, as well as the indicators of criminal exploitation, can differ between genders, resulting in these children being at a higher risk of sexual exploitation.

vi. **Domestic violence (DV)**

The definition of Domestic Violence includes any pattern of controlling or coercive or threatening behaviour, (psychological, physical, sexual, financial or emotional) between those aged 16 or over who are or who have been intimate partners or family members regardless of gender or sexuality. Harm from domestic violence can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children. Children can be victims, and perpetrators, in their own relationships too. The abuse can be physical, sexual, financial, psychological or emotional. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children as victims in their own right.

The definition of harm as amended the Adoption & Children Act 2002:

Impairment suffered from seeing or hearing the ill treatment of another' particularly in the home, even though they themselves have not been directly assaulted or abused.

Children who witness domestic abuse are also victims, as exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, the child may blame themselves for the abuse. The harm suffered will vary according to the child's resilience or otherwise to his or her particular circumstances. We recognise that the victim's capacity to protect their child/ren is diminished through anxiety about their own circumstances. Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships).

KCLMS will allow an opportunity for the abused partner to disclose the harm. We will ensure that all information is dealt with securely and sensitively and refer the matter to LA children's social care where there is a child/ren at risk of significant harm and/or neglect. Lambeth has commissioned the Gaia Centre to offer support for victim of domestic abuse.

<http://www.refuge.org.uk/our-work/our-services/one-stop-shop-services/the-gaia-centre/>

Operation Encompass – ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform usually the designated safeguarding lead in the school before the child arrives at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

vi. **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead and deputy will be aware of the contact details and referral routes into the Local Housing Authority to raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behavior as well as the family being asked to leave the property.

vii. **Honour-based Abuse (HBA):**

'Honour-based' abuse encompasses incidents of crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of action to take.

All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. The DSL will activate local safeguarding procedures, using national and local protocols for multi-agency liaison with police and the children's social care.

Female genital mutilation (FGM): FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 35-41 of the [Multi-agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools).

All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining students. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher is unsure whether this reporting duty applies, they must refer the matter to the Designated Safeguarding Lead in accordance with this policy.

See the [Home Office guidance](#) for further details about the duty.

Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the school's medical staff.

Forced marriage: Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

The Forced Marriage Unit has published [statutory guidance and multi-agency guidelines](#), gives guidance on the warning signs that forced marriage may be about to take place, or may have already taken place. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk
Staff should speak to the Designated Safeguarding Lead if they have any concerns

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viii. Radicalisation and the Prevent duty

KCLMS has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

KCLMS aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. KCLMS is committed to providing a safe space in which students, young people and staff can

understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

KCLMS has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. 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. Students at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

"There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances."

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others."

Protecting students from the risk of radicalisation is part of the wider safeguarding duties at KCLMS and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The DfE's briefing note 'The use of social media for on-line radicalisation' (2015) includes information on how social media is used to radicalise young people and guidance on protecting students at risk.

ix. Children requiring mental health support

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. The school will require all staff to receive training that being rolled out by the government to develop a whole school approach to mental health, including Mental Health First Aid training for appropriate members of staff.

KCLMS have clear systems and processes in place for unedifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of children and their parents

If a member of staff has a mental health concern about a student, they will speak to the DSL or DDSL. KCLMS works with external agencies to help identify children in need of extra mental health support, following *Mental Health and behaviour in schools*, November 2018.

x. Young Carers

Parents with care and support needs are those that have mental health problems, problem dependency on substances, a learning disability, a physical disability. Many parents with care needs are also economically deprived, which will have a negative impact on an individual's ability to parent successfully.

Children's needs are usually met by supporting their parents to look after them. Professional need to recognise that parents may have limited insight into understanding their own needs and therefore be unable to recognize the impact this is having on their ability to parent.

The DSL will consider the concerns for either an 'Early Help' intervention or a referral to Lambeth Social Care, or the relevant Local Authority, if appropriate.

xi. **Special educational needs and disabilities**

The school welcomes students with special educational needs and disabilities and will do all that is reasonable to ensure that the school's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the KCLMS on Special Educational Needs Policy.

Additional barriers can exist when detecting the abuse or neglect of students with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The school is mindful in particular that:

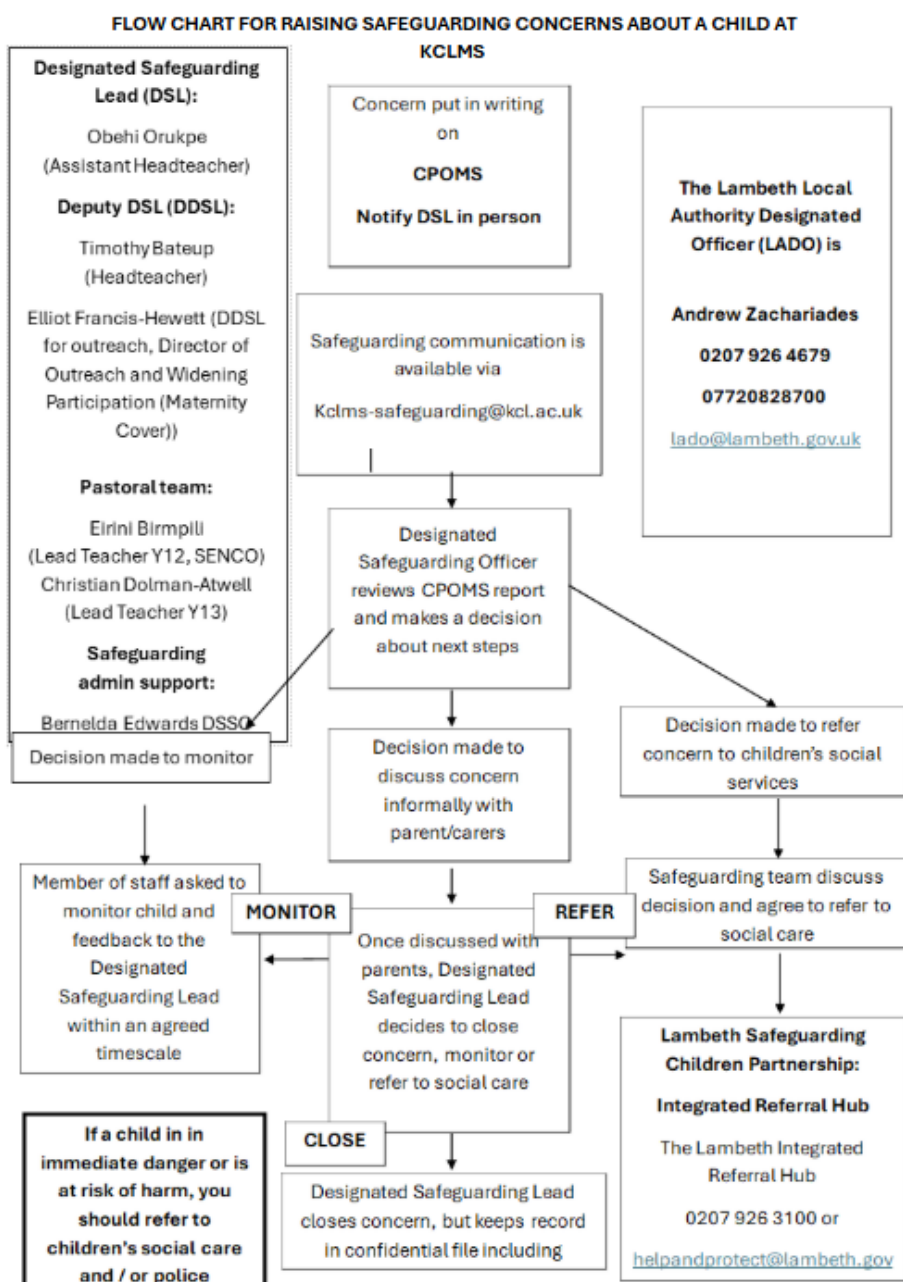
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's special educational need or disability without further exploration;
- students with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and
- there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

Appendix 2

Guidance to staff

In KCLMS policy, “student” means all students enrolled at KCLMS from the date of our receipt of their application to join KCLMS until the day after the 31st August of the year they complete Y13).

In order that staff do not place themselves or students at risk of harm or of allegations of harm to a student, staff must follow the guidance given in the KCLMS Staff Code of Conduct, which is also updated annually.



Appendix 3: LADO referral form

AGENCY REPORTING FORM FOR ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH CHILDREN WITHIN THE LONDON BOROUGH OF LAMBETH

WHEN TO USE THIS FORM

This form must be filled in and sent to the Local Authority Designated Officer (LADO) in Lambeth in every case where it is *alleged* that a person working with children has

1. behaved in a way that has *harmed* or may have harmed a child
2. possibly committed a *criminal offence* against or related to a child
3. behaved towards a child/ren in a way that indicates s/he would pose a risk of harm to children

Whilst it will not be necessary to convene a Strategy Meeting with Social Care and the Police on every case, every incident should be recorded on this form and reported to the Local Authority Designated Officer based in the Quality Assurance Section, Lambeth CYPS Social Care. The LADO can be contacted on 0207 926 4679.

You may be asked to provide associated relevant documentation with this referral form. Once the information has been evaluated by the LADO you will be advised re the appropriate action to be taken.

Link to LADO referral form: <https://www.lambethsab.org.uk/node/232>

Appendix 4

Safeguarding Children

Allegations of Abuse against Teachers, the Head Teacher, Governors, Volunteers and Other Staff

This guidance reflects *Part 4: KCSIE* and CP7 of London Safeguarding Children Procedures which will be followed when dealing with allegations against staff and volunteers (people in positions of trust), who work with children. The Governing Body will ensure that there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.

1 Key points:

- 1.1 If an allegation is made against a teacher, the quick resolution of that allegation should be a clear priority to the benefit of all concerned. Any unnecessary delays should be eradicated. The LADO will be informed immediately and in any event within one working day of all allegations that come to the attention of KCLMS and appear to meet the criteria set out below.
- 1.2 Allegations that are found to be malicious should be removed from personnel records; and any that are unsubstantiated, unfounded or malicious should not be referred to in employer references.
- 1.3 Students that are found to have made malicious allegations are likely to have breached school behaviour policies. KCLMS should therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the Police if there are grounds for believing a criminal offence may have been committed).

2 Procedure

- 2.1 The KCLMS procedures for dealing with allegations against staff will be used where the teacher, the Head Teacher, Governor, volunteer or other member of staff 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 s/he may pose a risk of harm to children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 2.2 The procedures below for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay. Advice from the LADO will be sought in borderline cases.

2.3 The following definitions should be used when determining the outcome of allegation investigations:

- *Substantiated*: there is sufficient evidence to prove the allegation;
- *False*: there is sufficient evidence to disprove the allegation;
- *Malicious*: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- *Unsubstantiated*: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

3 Reporting an allegation

3.1 The reporting requirements for allegations against a teacher, the Head Teacher, Governor, volunteer or other member of staff are set out below. In all cases, the member of staff making the allegation may consider discussing their concerns with the DSL and making a referral via them. The only circumstances in which this would not be appropriate is if the allegation is against the DSL.

3.2 Where an allegation or complaint is made against any member of staff (other than the Head Teacher, the Designated Safeguarding Lead or a volunteer) the matter should be reported immediately to the Head Teacher, or in his absence to the chair of governors. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the Head Teacher / chair of governors will consult with the DSL.

3.3 Where an allegation or complaint is made against the Head Teacher, the matter should be reported immediately to the chair of governors or in their absence to the vice chair, without first notifying the Head Teacher. The allegation will be discussed immediately with the LADO before further action is taken.

3.4 Where an allegation is made against any governor, the matter should be reported immediately to the chair of governors or the Safeguarding Governor. If either the chair of governors or the Child Protection Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the chair of governors will consult the Safeguarding Governor, and vice versa.

3.5 If it is not possible to report to the Head Teacher, chair of governors, vice chair of governors or the Safeguarding Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head Teacher or, where appropriate, the chair of governors, vice chair of governors and the Child Protection Governor.

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

4 Disclosure of information and confidentiality

- 4.1 The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.
- 4.2 The parents of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 4.3 It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. There are statutory reporting restrictions in place preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.
- 4.4 The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public".
- 4.5 The Head Teacher / designated safeguarding lead should take advice from the LADO, the Police and children's social care services as appropriate to agree the following:
 - who needs to know and, importantly, exactly what information can be shared;
 - how to manage speculation, leaks and gossip;
 - what, if any, information can be reasonably given to the wider community to reduce speculation; and
 - how to manage press interest if and when it should arise.

5 Further action to be taken by the school

- 5.1 A School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The school will take action in accordance with Part Four of *KCSIE*, the London Safeguarding Children Procedures and KCLMS's employment procedures.

6 Resignations and compromise agreements

- 6.1 If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be

possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

- 6.2 So-called 'compromise agreements' or settlement agreements, by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in these cases. Such an agreement will not prevent a thorough police investigation where that is appropriate.

7 Record keeping

- 7.1 The DSL will ensure that all child protection records, and safeguarding concerns are kept separately from pupil records. The records will be stored securely, by encryption and/or password protecting electronic files. Paper records will be secured in a locked cabinet with restricted access. Information from the records may be shared with school staff on a need-to-know basis.
- 7.2 All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- 7.3 Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.
- 7.4 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS disclosures reveal information from the Police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

KCLMS will retain all safeguarding records and relevant personnel records for so long as reasonably required. The DfE requires schools to maintain safeguarding records on students until they are aged 25.

8 References

- 8.1 Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

9 Oversight and monitoring

- 9.1 The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with the Local Safeguarding Children Board

(LSCB) on the subject. The LADO will provide advice and guidance to the case manager, in addition to liaising with the Police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

10 Action following a conclusion of a case

- 10.1 There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. In such circumstances, the duty to refer an individual to the DBS arises where an employer has removed the individual from relevant work with children or the person has chosen to cease relevant work in circumstances where they would have been removed had they not done so. Referrals should be made as soon as possible.
- 10.2 Where a teacher has been removed from relevant work with children or has chosen to cease relevant work in circumstances where they would have been removed had they not done so, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership should be made.
- 10.3 Professional misconduct cases should be referred to the relevant regulatory body.

11 Action in respect of unfounded or malicious allegations:

- 11.1 If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to the children's social care services to determine whether the child concerned is in need of services or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the head teacher should consider whether any disciplinary action is appropriate against the student who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a student. Where a parent has deliberately invented an allegation, the head teacher may ask the parent to withdraw their child from the school.

Additional information has also been added to KCSIE on teacher dismissal due to serious misconduct and consideration whether it is appropriate to refer the case to the Secretary of State via the Teaching Regulation Agency.

Appendix 5

Visiting Speakers Policy

Brief details for visiting speakers should be seen by the Head Teacher in advance of the talk and ideally at least one week beforehand.

Introduction

KCLMS often invites speakers from the wider community to give talks to enrich our students' experience. The school recognises the enormous benefit gained by students from speakers from all walks of life. Both the school and students greatly appreciate the time and effort that visiting speakers put into their presentations.

The purpose of this policy is to set out the school's legal obligations when using visiting speakers and to set out the standards of behaviour expected from visiting speakers.

This policy supports the aims and ethos of the *Child Protection Policy* and takes into account the Educate Against Hate advice [Hosting Speakers on School Premises](#).

Overview

The *Prevent Duty Statutory Guidance (2023)*, along with *Keeping Children Safe in Education (September 2025)* expect schools to have clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. This policy has therefore been drawn up with regard to the Government's prevent duty guidance and the school's wider safeguarding obligations.

The school's responsibility to students is to ensure they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the school and British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

School protocol

All requests for outside speakers are organised by the Assistant Head (School Development, Careers and Culture (SDCC)) and then cleared by the Senior Leadership Team once dates have been booked. They are brought to the SLT by the Assistant Head (SDCC).

(SDCC) will research a given speaker and double-check their content before agreeing to them attending the school. This research may include the speaker's organisation. Visiting speakers are only booked if they have been recommended by mutual contacts of the school or have been found in established databases of speakers. If the speaker is deemed to be controversial, they will be shared with the Assistant Head (SDCC) to be discussed with the SLT in advance of any booking being made. This will consider any safeguarding checks considered appropriate in the circumstances.

KCLMS will obtain an outline of what the speaker intends to cover in advance of their visit. In some cases, the school may also request a copy of the visiting speaker's presentation and/or footage in advance of the session to ensure it is appropriate to the age and maturity of the students to be in attendance.

The visiting speaker must be made aware of the school's obligations to safeguarding by referring them to the school's *Safeguarding Policy* on the website, in advance of their visit to the school.

Visiting speakers will be supervised by a member of staff whilst on the school site. At no point will a visiting speaker be left unsupervised on site whilst students are present. Any concerns for the content or nature of the talk should be referred to the Head Teacher immediately.

On arrival at the school, visiting speakers will be signed in and assigned a designated member of staff who will remain with them for the duration of their visit. The visiting speaker will be issued with a visitors' badge and the school's safeguarding card, which they must wear all times whilst on school site.

The Assistant Head (SDCC) keeps a formal register of visiting speakers, which is saved centrally in SharePoint. This includes the name, email, talk outline and date(s) visited. Any information gathered will be kept in accordance with the school's *Data Protection Policy*.

External organisations Relationships, Sex and Health Education (RSHE)

For external organisations delivering Personal Development (PD)/ PSHE content in relation to RSHE, a due diligence pro-forma will be completed by the pastoral team by way of vetting the organisations suitability to deliver content at KCLMS. This form can be shared with SLT and Governors where final approval will be made. KCLMS has the right to request access to the organisation's content and policies ahead of the scheduled delivery including presentation materials.

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If you have any concerns that a student may be at risk of significant harm, either to themselves or from somebody else:

- Inform the Designated Safeguarding Lead (DSL), Obehi Orukpe
- If she is not available, please inform the Deputy Safeguarding Lead, Timothy Bateup
- If the concern relates to a KCLMS Outreach activity, please inform the Deputy Safeguarding Lead for Outreach, Hannah Holland

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Appendix 6

Safeguarding Procedures for KCLMS Outreach Activities

King's College London Mathematics School aims to be a centre of excellence for the teaching and learning of mathematics. To realise this vision, we run voluntary classes and events for students each year aged 9 – 18 as part of our outreach programme. A key part of this is a programme of GCSE enrichment for students encompassing Maths and Physics GCSE+, 7+, several Axiom Maths Circles, mentoring local students, two Summer Schools, and various activities to support the admission programme at KCLMS. Many of these programmes are run in-person for students from across London, and others are run online to enable access to students from further afield.

Throughout these activities we also aim to safeguard our participants and promote the welfare, health and safety of the young people who interact with KCLMS by maintaining an open, safe and supportive environment on our programmes, including those that take place online.

For information about safeguarding procedures for KCLMS Outreach Activities, please see the separate document 'Safeguarding Policy for KCLMS Outreach Activities'. This policy applies to all staff within the Outreach team including KCLMS staff, volunteers, casual staff (including Student Helpers) and any individuals engaged in activities on behalf of the teams, including external collaborators. Any reference to 'staff' within this policy refers to all of these groups.

All staff involved in KCLMS Outreach Activities will be either:

- A member of KCLMS staff
- An external recruitment

Members of KCLMS are fully trained in safeguarding as per this document, and will follow the same procedures as they would for any KCLMS student. Externally recruited members of staff will be asked to confirm that they have read the 'Safeguarding Procedures for Students and Staff involved in KCLMS Outreach activities' policy before starting work for the school, as well as complete the appropriate training as set out in said policy.

The Deputy Designated Safeguarding Lead for Outreach Activities, Elliot Francis-Hewett, will take the lead on safeguarding within Outreach but will liaise with the KCLMS DSL and other DDSL where appropriate.