

Policy on Safeguarding and Promoting the Welfare of Children (Child Protection Policy)

- This policy has been written with regard to **Keeping Children Safe in Education** (KCSIE, September 2021), **Disqualification under The Childcare Act** 2006 (July 2018), **Working Together to Safeguard Children** (WT, July 2018), **the Prevent Duty Guidance for England and Wales** (Prevent, March 2015).
- The policy has also been written with regard to the associated non-statutory advice, as detailed in the ISI Handbook (September 2021), including **What to do if you are worried a child is being abused** (March 2015), **Information Sharing** (2018), **The Prevent Duty** (June 2015) **The use of social media for online radicalisation** (July 2015), **Harmful online challenges and online hoaxes (Feb 2021)** and **When to call the police**
- *Advice and guidance to staff is contained in the School's Safeguarding Code of Conduct and in the appendices to this policy.*
- *Our policy and guidance related to COVID-19 is contained in an addendum to this safeguarding policy. It was written with regard to Non-statutory interim supplements to KCSIE: **Coronavirus (COVID-19): safeguarding in schools, colleges and other providers (2020 subject to DfE updates)** and **Safeguarding and remote education during coronavirus (COVID-19)***
- *This policy should be read in conjunction with the School's Behaviour Policy, Anti-Bullying Policy, Whistleblowing Policy, Educational Visits Policy, the Substance Abuse Education and Management Policy, the IT Acceptable Use Policies, the Curriculum Policy (including provision for the spiritual, moral, social and cultural development of pupils), the Safer Recruitment Policy and the Health and Safety (Risk Assessment) Policy.*
This policy fulfils the ISSRs 2014 Part 3, Paragraph 7(a) and (b)

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Useful Contact Details

- **Highgate - Designated Safeguarding Leads:**

Highgate School Lead DSL and Senior School DSL

Mr Graeme Robertson, Deputy Head Pastoral
Tel: 020 8347 4440

Senior School Deputy DSL

Miss Louise Shelley, Senior Deputy Head
Tel: 020 8347 3574

Senior School Assistant DSLs

Mr Arthur Dabrowski (Acting Head of Middle School)
Tel: 0208 347 2127

&

Mr Sam Pullan (Head of Lower School)
Tel: 0208 347 2190

&

Mrs Verity Smith (Assistant Head of Sixth Form)
Tel: TBC

&

Dr Enya Doyle (Acting Director of Inclusion)
Tel: TBC

Junior School DSL

Ms Philippa Studd (Deputy Principal, Pastoral)
Tel: 020 8340 9193

Junior School Deputy DSL

Mr Matthew Foley (Deputy Principal)
Tel: 020 8342 7275

Pre-Prep School DSL

Mr Gideon Zucker (Deputy Principal)
Tel: 020 8347 4413

Pre-Prep School Deputy DSL

Sally Hancock (Deputy Principal)
Tel: 020 8347 4419

Support Staff DSL

Kasia Wojtkowiak (Director of Compliance)
Tel: 020 8347 3584

- **Haringey Safeguarding Children Partnership**

Haringey Safeguarding Children's Partnership
7th Floor, River Park House
225 High Road
London N22 8HQ

Email: hscp@haringey.gov.uk
Tel: 020 8489 3145

If you are worried about a child for any reason, **contact MASH on 020 8489 4470.**

If you are making a referral: MashReferral@haringey.gov.uk

If you are calling between 5pm and 9am weekdays or anytime at the weekend, call the **Emergency out-of-hours duty team on 020 8489 0000.**

If you or a child is in immediate danger you should always phone 999.

- **Haringey Local Authority Designated Officer (LADO); Allegations Against Professionals**

Email: lado@haringey.gov.uk
Tel: 020 8489 2968 / 1186

A list of all local authorities where Highgate pupils live is available from the Senior School Office. Mr. G Robertson (Deputy Head Pastoral / Designated Senior Lead) writes to the

Children's Social Services Departments in each borough at the start of each academic year with names and contact numbers for the School's Designated Teams.

The following tool '[Report Child Abuse to your Local Council](#)' allows you to find contact details of the relevant children's social care team using a young person's postcode.

NSPCC

A dedicated helpline to support anyone who has experienced sexual abuse in educational settings or has concerns about someone or the issues raised.

0800 136 663

Female Genital Mutilation

The Highgate Local Neighbourhood Police Team can be contacted by telephone: 0208 721 2673

Alternatively, the Metropolitan Police Service (MPS) may be contacted by telephone 101 (for non-emergencies) or 999 (if there is an immediate risk of harm).

Project Azure is the MPS response to female genital mutilation: Tel - 0800 028 3550, projectazure@met.police.uk

PREVENT

Concerns about a child, young person, or a family will result in a referral to the SPA (Single Point of Access)/MASH Team (Haringey), they will assess their needs in terms of safeguarding and liaise with the Prevent Coordinator regarding any extremism related concerns. Contact details below:

- 020 8489 4470 during office hours, or 020 8489 0000 out of hours (including weekends)

If the concerns are about an adult then a referral will be made to the Haringey Prevent Coordinator, who will assess their needs in terms of any extremism related concerns and liaise with relevant services, such as adult social care regarding any safeguarding issues. Contact details below:

- 020 8489 3884 or 020 8489 1280 (office hours only)
Email: prevent@haringey.gov.uk

(if the person lives outwith Haringey please contact the relevant local authority)

The Department for Education has dedicated a telephone helpline (**020 7340 7264**) to enable staff and governors to raise concerns relating to extremism directly.

The UK Anti-Terrorist hotline: 0800 789 321 / Crime Stoppers: 0800 555 111

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1 Introduction

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

- protecting children from maltreatment;
- preventing the 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; and
- taking action to enable all children to have the best outcomes.

The Governors, Head, and staff of Highgate fully recognise the contribution they must make to safeguarding children and promoting their welfare. All staff members, including volunteers, have a full and active part to play in considering, at all times, what is in the best interests of a child.

The Governors will ensure they facilitate a whole school 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 will operate with the best interests of the child at their heart. There is a shared responsibility to identify concerns early, provide timely help and protect pupils from harm or the risk of harm. We believe that our School should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child.

The aims of this Safeguarding Policy are:

- To support each child's development in ways that will foster security, confidence and independence;
- To raise the awareness of both teaching and support staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of children in need, children at risk of harm and children who may be suffering from abuse. All staff are required to adopt the attitude that safeguarding incidents could happen here and staff should be alert to possible concerns being raised at Highgate;
- Early help: To provide a systematic means of identifying children known or thought to be in need of additional support for their personal, emotional or educational fulfilment. This may involve referrals to our own Learning Support Department, our School Well-being Department and coordination and cooperation with external agencies via a Childrens' Social Services referral or Early Help Assessment. Such vigilance and monitoring require good levels of communication between all members of staff, as between themselves and with senior management. Inaction should be challenged and concerns should always lead to appropriate help for a child in need;
- Risk of harm: To develop a structured procedure of contacting the Head, the Principals of the Pre-Prep or the Junior School or the Designated Safeguarding Leads where a child may be at risk of harm or may be suspected to be suffering abuse (including online abuse), and to foster an environment and culture where those procedures will be

readily invoked. In addition, all staff are aware that anyone can and must raise concerns immediately and directly with Children's Social Services or the Police if there is a risk of immediate harm to a child;

- To develop and promote effective working relationships with other local safeguarding partners, especially the Police, Social Services and NHS / CAMHS;
- To ensure that all adults within our School who have access to children have been subjected to the suitability checks required by KCSIE Part 3 and Part 4 of the Independent School Standards Regulations 2014 in respect of their suitability to work with children.

2 Legal Framework

Highgate is aware of its obligation to make arrangements to safeguard and promote the welfare of pupils at the School as set out in Sections 157 and 175(2) of the Education Act 2002. The DfE guidance to which the School has regards is: *Keeping Children Safe in Education (KCSIE – September 2021)*, which incorporates *Disqualification under the Childcare Act 2006 (July 2018)* and also refers to the non-statutory guidance: *What to do if you're worried that a child is being abused (March 2015)*. The School also has regard to: *Working Together to Safeguard Children (WT – July 2018)*. The School also has regard to: *The Prevent Duty Guidance for England and Wales (PD – March 2015)*, which is supplemented by the non-statutory guidance and a briefing note, *The Prevent Duty: Advice for Schools (June 2015)* and *The use of social media for online radicalisation (July 2015)*. We are mindful of our duty to actively promote British values and to prevent people from being drawn into radicalization and extremism.

The School's safeguarding policy also applies to the Early Years Foundation Stage (EYFS). The Principal of the Pre-Preparatory School and her Deputies have safeguarding responsibilities within the EYFS setting and will liaise with the appropriate local Safeguarding Partners and Ofsted as required. In line with national minimum standards, and consistent with the agreed local safeguarding procedures, the school has an appropriate policy on child protection and response to allegations or suspicions of abuse. The policy is known to staff, pupils (through age appropriate assemblies and PSHEE / Form lessons) and is made available to parents (and prospective parents) on the School's website or on request.

3 Procedures

Our child protection policies and procedures for dealing with allegations of abuse are in accordance with KCSIE and locally agreed inter-agency procedures. They are set out below.

3.1 Reporting concerns about a child

Whenever any member of staff has a concern about a child or a reason to suspect that a pupil may have suffered abuse, the DSL, or in his/her absence the relevant Deputy DSL must at once be informed.

The member of staff should:

- Send an email / ring the DSL distinguishing clearly between fact, observation, allegation and opinion, noting any action taken to support and / or prevent immediate harm to the child.
- Good practice guidance for staff on managing a disclosure from a pupil, including expectations on confidentiality, is contained in **Appendix 3**.
- The DSL will open a secure Safeguarding file for that pupil on CPOMS.
- The DSL will then decide whether to make a formal referral to children's social services (and if appropriate the police), in addition to consulting with other DSLs and Pastoral staff, as required, to devise and implement a plan of action to support the pupil.
- Schools do not always need consent to share personal information provided that there is a lawful basis to process any personal information required.

3.1.1 Child suffering or likely to suffer significant harm (KCSIE, September 2021, Para 66):

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

Concerns that a child is in immediate danger or is at risk of significant harm will be discussed with children's social care services in the area of the child's residence (and / or the police if a crime may have been committed) immediately.

Subsequent actions will follow agreed inter-agency procedures including use of the "Common Assessment Framework" (CAF) and "Team around the Child" (TAC) approaches.

3.1.2 Child in Need (KCSIE, September 2021, Para 65):

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Concerns that a child may be in need of additional support will be discussed with children's social care in the area of the child's residence.

Should a child be in need of additional support from one or more local Safeguarding Partners, the School will keep in close touch with such agencies and assist with inter-agency assessment using local processes. The relevant DSL, or Deputy DSL, will attend any strategy meetings and will follow agreed procedures.

The School will take the advice and recommendations of the local Safeguarding Partners in the area in which the child resides, implementing and referring the appropriate services for any particular child, including referring to the relevant Local Authority / Safeguarding Partner website for any guidance on thresholds and eligibility criteria. Referral for early help services will be made to prevent needs escalating for children with low-level needs who may require extra services to help them achieve good outcomes. This will be under constant review by the relevant members of the pastoral team in liaison with the Head of Section and Deputy Head (Pastoral) and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

3.1.3 Record Keeping (KCSIE, September 2021, Para 71-72)

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

3.2 Training

3.2.1 New staff

All new members of staff and volunteers in regulated activity are provided with a copy of KCSIE Part 1 and Annex B (September, 2021) if they are working directly with children, and Annex A (September, 2021) if they are not working directly with children. They are also provided with the School's Safeguarding Code of Conduct for Staff, the School's Safeguarding and Welfare policy (incorporating the Prevent duty obligations), the Pupil Attendance policy (incorporating guidance on Children Missing Education), the Pupil Behaviour policy and the Whistleblowing policy as part of their induction into the School.

The requirement is:

- Part one (or Annex A if determined by the governing body/proprietor as appropriate) KCSIE should be read and understood by all staff, Annex B by school leaders and those who work directly with children
- pupil behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- safeguarding response to children who go missing from education (CME policy*)

- staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships, the low-level concerns policy and communications including use of social media).

All staff working with children complete an annual compliance statement and online test to ensure that they have read and understood their statutory obligations (see 3.2.3 below). All new staff members are made aware of the identity and role of the Designated Safeguarding Leads (and Deputies) across the School.

All new staff and volunteers in regulated activity will meet with Mr G Robertson (Senior Designated Lead and Deputy Head Pastoral) or another Designated Lead from the appropriate section of the School, to discuss the School's policy and procedures for safeguarding and child protection, the Staff Code of Conduct and the Whistleblowing policy, in addition to the School's key pastoral policies such as the Attendance, Behaviour and Anti-bullying (including IT Acceptable Use and online safety) policies.

3.2.2 Designated teachers (Designated Safeguarding Lead)

In each section of the School we have a designated teacher (or teachers) in charge of child protection who undertake appropriate training at least every two years and fulfil the function of a *Designated Safeguarding Lead (DSL)*; see section 5. Support staff may report allegations to any DSL at School, and can also get advice at any time from Mrs Kasia Wojtkowiak who is the designated DSL for the support staff. The Lead DSL is Graeme Robertson (Deputy Head (Pastoral)). Regular updates on child protection training are also provided by the Designated Safeguarding Leads who have attended appropriate L3 training under the aegis of Children's and Young People's Services at the various London boroughs from which Highgate's pupils are drawn, or by other appropriate training providers.

3.2.3 On-going training

All staff are updated when KCSIE is revised and must acknowledge their understanding of their obligations. A record of this acknowledgement is held by the Human Resources Department. In addition, all staff are given regular safeguarding (at the appropriate Level 1 - 3) by appropriate training providers in order to develop their understanding of the signs and indicators of abuse and to know how to respond to a pupil who discloses abuse, including where such abuse may be child on child sexual violence and sexual harassment. Where staff cannot read English appropriate steps will be taken to ensure that they understand key information and procedures to safeguard pupils. A record of Safeguarding training is kept by the Human Resources and Operations Department and copies are available to the Designated Senior Leads. This training is updated in accordance with advice from our local Safeguarding Partner, Haringey LA. The table below outlines the training level requirements for staff.

Staff	Level	Frequency
DSLs; Head; Principals of Junior School and Pre-Prep; Principal Deputy Head; Deputy Head Pastoral, Community Partnerships Director; Director of Wellbeing; Heads of Sections in Senior School	L3	Every 2 years

All staff with pastoral responsibility (Senior School: Heads of Y7/Y8 and Heads of Houses; Junior and Pre-Prep School: non-DSL members of SLT)	L1/2	Every 2 years
All staff	L1	Every 3 years

3.3 Informing parents/carers

Parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures within information provided on joining the school. A copy of this policy is also made available to parents (and prospective parents) on the School's website and on request and this is explained in annual communications to parents. We will always undertake to share our intention to refer a child to Social Services with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the appropriate Local Authority Designated Officer. The School will always seek to hold at least two emergency contact numbers for parents, including single parents / carers, wherever possible.

3.4 Safer recruitment

The School carries out all the required checks on staff in line with guidance laid down in KCSIE 2021, Part 3. The School's Safer Recruitment Policy gives details of the pre-employment checks undertaken by the School for the suitability of potential employees to work with children; this is also available from the Head's Secretary in response to legitimate safeguarding-related enquiries. The School's HR Department holds the list of senior staff who have completed Safer Recruitment Training, via an approved training provider. This training is refreshed at regular intervals for all those staff who may be required to contribute to the recruitment process.

3.4.1 Volunteers

A Designated Safeguarding Lead and the School's Human Resources Department will follow the guidance set out in KCSIE 2021 Part 3, para 183 - 188 in deciding whether a Disclosure and Barring Service (enhanced DBS check) and other appropriate checks should be obtained in respect of a volunteer. Unchecked volunteers will be supervised by staff whether engaged in regulated or non-regulated activity. In addition, all new volunteers are provided with a Safeguarding and Welfare briefing, prior to undertaking any activity where they will have access to pupils (e.g. accompanying school trips) which highlights their responsibilities and the policy as it relates to them. More details on these requirements can be found in the School's Educational Visits Policy.

3.4.2 Other staff working with Highgate pupils (KCSIE, September 2021, Part 3)

The School requires appropriate checks to be made on staff employed by other organisations working on the school site and likely to have unsupervised access to children, such as agency, third party staff (KCSIE, para 268-271) or trainee teachers (KCSIE, para 278-280). Appropriate enhanced DBS and identity checks will be undertaken and visitor / identification badges issued. The School's Educational Visits Policy requires trip organisers to check with other organisations (e.g. residential centres, museums, D of E Scheme trainers) to verify that their employees working with our pupils have undergone

satisfactory checks on their suitability to work with children. Written confirmation that appropriate checks have been undertaken by partner schools, agencies, contractors, work experience supervisors or host families will be obtained.

3.5 Allegations of suspected abuse by staff or volunteers, including supply staff

The School will follow the locally agreed procedures for managing allegations against staff, working with the appropriate Safeguarding Partners (Local Authority / Police/ NHS). These procedures are currently set out in the London Child Protection Procedures (March 2021, updated every 6 months), https://www.londoncp.co.uk/alleg_staff.html.

The School will consider any allegation but also other information that suggests a staff may pose a safeguarding risk. This would include information that suggests they have behaved in a way that indicates they may not be suitable to work with children – even if this takes place outwith School but suggests a transferable risk.

A pupil, member of staff or a volunteer may make an allegation of possible abuse against a member of staff (including supply staff) or a volunteer. A pupil may make the allegation to another pupil, a parent, a member of staff or a volunteer. All staff and volunteers must be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues or volunteers. ***If an allegation is made, the member of staff or volunteer receiving the allegation will immediately inform, as appropriate, either the Head or, in his absence, the Principal Deputy Head or the Principal of the Junior School or the Principal of the Pre-Preparatory School.*** If a pupil informs his or her parent of any such allegation the School reasonably expects that the parent will report the allegation to the School and other appropriate authorities (see Useful Contact Numbers on page 2), to enable appropriate enquiries to be undertaken.

Normally, a Designated Safeguarding Lead will be nominated to immediately contact the Local Authority (LA) Designated Officer for Child Protection regarding an allegation. Such contact will certainly be within one working day (24 hours). Highgate will not undertake an investigation prior to consultation with the LA's Lead Officer. Discussions will be recorded in writing and communication with the individual and the parents of the child or children agreed. In cases of serious harm, or where a crime may have been committed, the Police will be informed from the outset. All considerations and investigations carried out by the School related to an allegation will eradicate any unnecessary delays.

The Head will be informed of all such allegations against staff, with the exception of an occasion where the Head is the subject of the allegation. Then the Head will not be informed and the matter will be reported to the Chair of Governors who will discuss the allegation with the Local Authority Designated Officer (LADO). It is also advised that the Designated Safeguarding Lead should be contacted in these instances (unless he or she is the object of the allegation).

Suspension of the individual who is the subject of the allegation will not be automatic and will only be applied if there is no reasonable alternative, after consultation with the LA's Lead Officer and the Police. The reasons and justification for such a decision will be recorded by the School and the individual will be notified of the reasons. Appropriate pastoral care and a named contact will be put in place for any suspended member of staff. Allegations that are found to be malicious will be removed from personnel records and any that are unfounded or malicious will not be referred to in employer references. Pupils who are found to have made malicious allegations will be subject to the School's Behaviour Policy and, after investigation, sanctions may include temporary or permanent exclusion, in addition to a referral to the Police if there are grounds to believe that a criminal offence has been committed.

Where the allegation or safeguarding is against a supply teacher the Lead DSL will immediately contact both the agency concerned and the LADO. The School will continue to support any investigation that is required and the School will liaise with the agency who provided the teacher.

The Chair of Governors, Mr Bob Rothenberg, may be contacted via the email: 'chairman@highgateschool.org.uk'.

Staff are also expected to report Low Level Concerns according to the policy outlined in the Staff Code of Conduct.

3.6 Allegations of abuse and instances of abuse by one or more pupils against another

The School's Code of Conduct, Anti-bullying Policy, Behaviour Policy and Peer on Peer Abuse Policy (included in this policy) makes clear the expectations on pupils of acceptable behaviour towards other pupils. A bullying incident can be treated as a child protection concern when there is reasonable cause to suspect that the child is suffering or is likely to suffer significant harm.

Part 5 of KCSIE 2021 explicitly refers to peer on peer abuse (see Appendix 5, for the policy), sexting (see Appendix 6), sexual assaults between young people, gender-based issues and the additional vulnerability of SEN/D pupils as circumstances where there may be a safeguarding concern requiring appropriate action.

An allegation of peer on peer abuse, including sexual violence or sexual harassment, should be reported to a Designated Safeguarding Lead. S/he will contact the appropriate Local Authority Children's Services team and seek advice in putting in place the measures necessary to safeguard the pupil; this may mean involving external agencies. In cases of serious harm, or where a crime may have been committed, the Police may be informed from the outset. (See Bullying note in Section 12)

3.7 Review

The Senior Designated Safeguarding Lead (Deputy Head Pastoral) reports annually to the full Governing body in the Summer Term (and more frequently where required) on the School's Safeguarding and Welfare policy and child protection procedures. In addition, a termly report on matters relating to safeguarding referrals and concerns, pupil conduct, bullying and mental health issues across all three schools is prepared by the Deputy Head Pastoral and reported to the Head, senior pastoral staff and the full Governing body.

The School's Safeguarding policy and procedures are also regularly reviewed by members of the Designated Safeguarding Leads Committee and updated as required.

The Strategy and Management Committee consists of: The Head, the Bursar, the Principal of the Junior School, the Principal of the Pre-Prep School, the Principal Deputy Head, the Deputy Head (Academic), the Deputy Head (Pupils' Personal Development and Employability) and the Deputy Head (Pastoral).

The Deputy Head Pastoral (Lead DSL) is responsible for ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay. Safeguarding and Welfare is a standing item on all major School committees and members of staff are encouraged to bring any matters of concern to the attention of the Deputy Head Pastoral without delay. The Deputy Head Pastoral chairs a termly meeting of the School's DSLs to discuss matters related to safeguarding and child protection and to strengthen best practice across the School.

An annual audit of the effectiveness of the School's safeguarding training is carried out by an external assessor. The assessor reports directly to the Governor with particular responsibility for Safeguarding and Child Protection, Dr Saral Anand, and to the Head. The audit is then reported to the DSLs and informs safeguarding and child protection planning.

The basis for, and nature of, any significant changes to the School's safeguarding and policy procedures will be published to all staff, and parents or pupils as appropriate.

4 Responsibilities and Management of Safeguarding

The legal responsibility for safeguarding and promoting the welfare of children lies with the full Governing body who are responsible for policy. They undertake an annual review of the School's policies and procedures (in the Summer term or more frequently as required; see 3.7 above) and consider how the School's duties have been discharged. The Head and the staff are responsible for implementation.

Schools are required to report, via the Disclosure and Barring Service (DBS), to the Secretary of State as soon as possible any individual (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children (KCSIE, 2021, para 329-334). In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency;

terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the DfE register of independent schools. Compromise agreements cannot apply in this connection. The School will fulfil its legal duty to respond to requests from the DBS for information it holds.

Where a teacher has been dismissed (or would have been dismissed had s/he not resigned) and the circumstances do not meet the threshold for a DBS referral but a prohibition order may be appropriate, a referral to the Teaching Regulation Agency (TRA) will be made. The reasons such a referral would be made may include unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. After consultation with the guidance: *Teacher Misconduct: the prohibition of teachers*, (October 2018) if there is still any doubt about the reason (s) to refer to the TRA, a referral will be made.

5 Designated Safeguarding Leads (KCSIE, September 2021, Annex C)

The Senior Designated Safeguarding Lead with responsibility for overseeing safeguarding and child protection issues for the whole School is the Deputy Head Pastoral (Mr Graeme Robertson). In addition, each section of the School has a designated member of staff (and deputies / assistants) with the status and authority within the school management structure to carry out the duties of the post of Designated Senior Lead.

Senior School

Graeme Robertson (Lead DSL)

Louise Shelley (Deputy DSL)

Arthur Dabrowski / Sam Pullan / Verity Smith / Enya Doyle (Asst. DSLs)

Junior School

Philippa Studd (DSL)

Matthew Foley (Deputy DSL)

Pre-Prep School

Gideon Zucker (DSL)

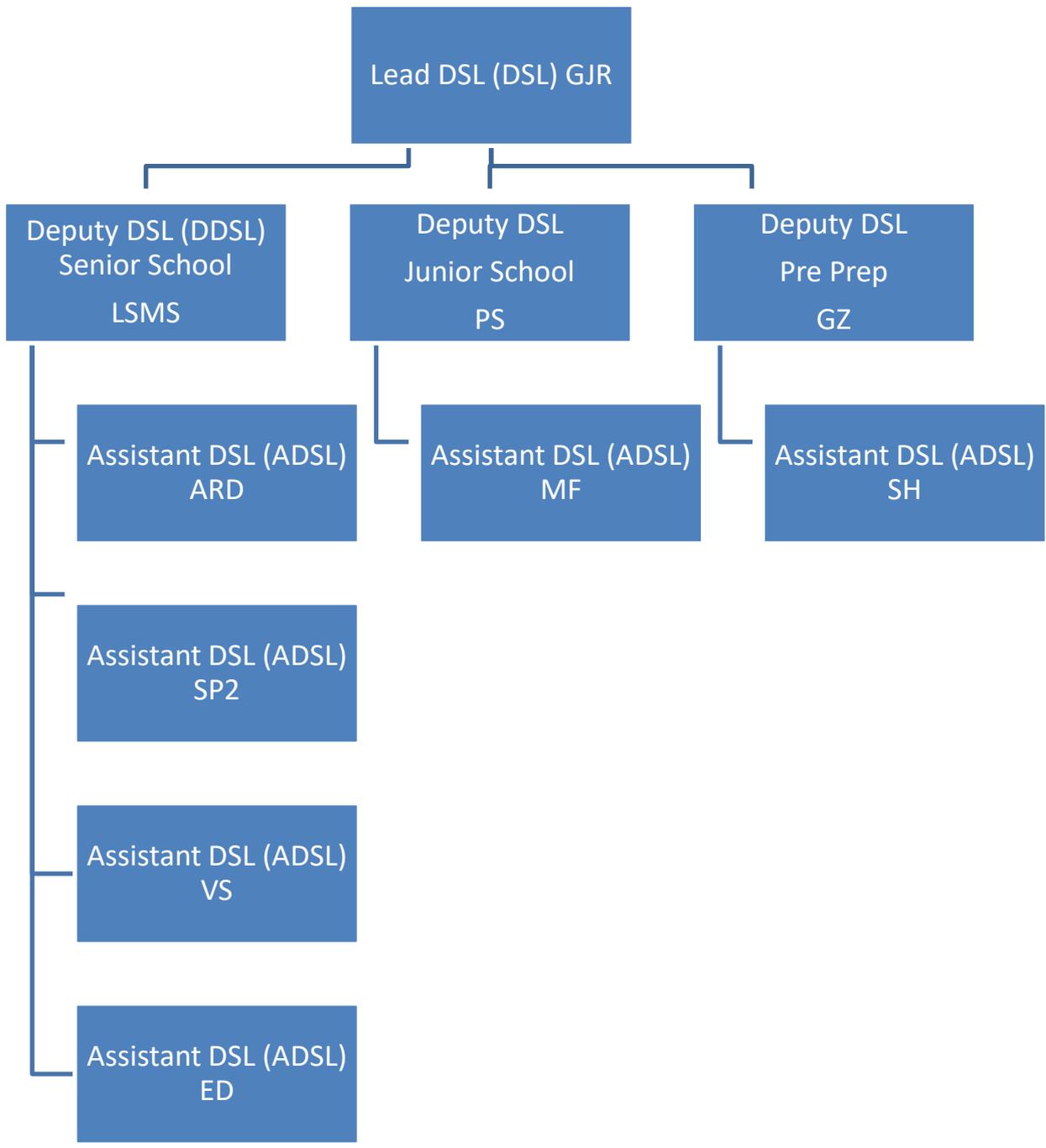
Sally Hancock (Deputy DSL)

Kasia Wojtkowiak (Compliance Director) has Level 3 Safeguarding training and work with Support staff on Safeguarding matters and training.

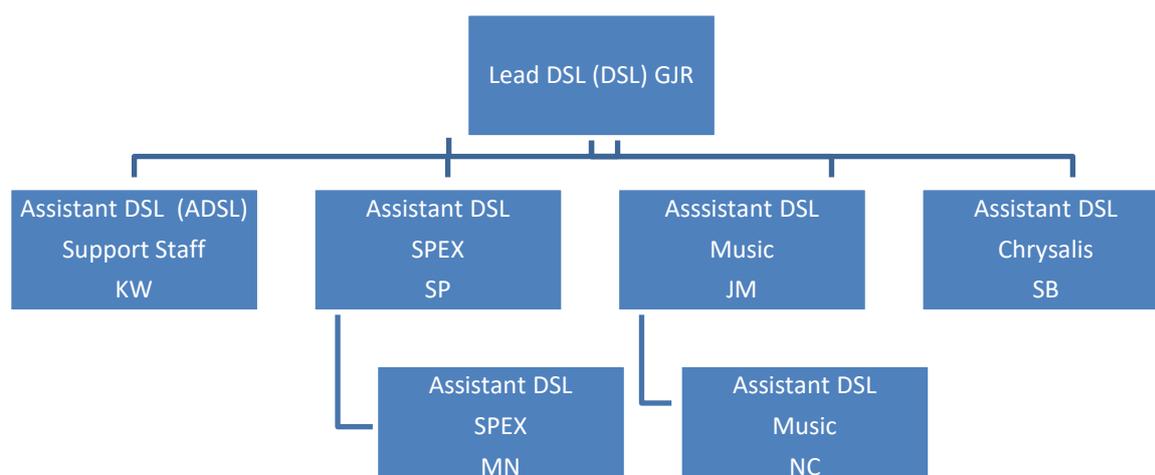
In addition, the termly DSL meeting is attended by staff representatives from the Music and Sport and Exercise (SpEx) Departments. These colleagues do not have DSL responsibilities but have been Level 3 trained and are charged with monitoring and sharing safeguarding best practice in their departments, especially among Visiting Music Teachers (VMTs) and specialist Sports coaches. These responsibilities are currently carried out by Stephanie Pride (Director of SpEx), Mario Noto (Deputy Director of SpEx) and Jonathan Murphy (Director of Music) and Natasha Creed (Music Department Manager). Our Community Partnership Director, Sarah Butterworth, is also part of the team.

The DSL Hierarchy is:

Teaching Staff



Support Staff



All Designated Leads have appropriate child protection training, but they also have training in inter-agency working, which is updated every two years and provided by Haringey Children’s and Young People’s Service or other approved trainers.

The Designated Safeguarding Leads are responsible for:

i. Working with Others and Managing Referrals

- Evaluating circumstances to differentiate between children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies and liaising with colleagues and external agencies accordingly to reach this judgement; See 3.1 Reporting concerns about a child;
- Adhering to the local Safeguarding Partner and School procedures with regard to referring a child if there are concerns about possible abuse;
- Liaising (as necessary) with the Lead Officer (Haringey continue to use the acronym LADO) on child protection concerns, the DBS where a person is dismissed or left due to risk or harm to a child and the Police, where a crime may have been committed;
- Liaising (as necessary) with the Local Authority Channel panel, in accordance with the obligations the *Prevent Duty (2015)*;
- Keeping written records of concerns about a child even if there is no need to make an immediate referral;
- Ensuring that all such records are kept confidentially and securely and are separate from general pupil records. The School’s DSLs use CPOMS software to securely record concerns and referrals. Paper files from before this date are held separately in the Deputy Head Pastoral’s office. Also ensuring that these include the key information required (clear and comprehensive summaries of concerns, details of follow up/outcome and notes of action/decisions);

- Ensuring that an indication of further record-keeping is marked on the pupil records and that records are securely and confidentially maintained until the child's 25th birthday - Please note: In June 2015 the Independent Inquiry into Child Sexual Abuse (IISCA), requested that all agencies, until further notice, retain everything of potential relevance to the inquiry i.e. all paper files and digital records and all other information however held. In addition, the School has reviewed its historic incident records to try to ensure that no line of investigation would be curtailed by the premature destruction of files or records that later become required as evidence;
- Ensuring that any pupil currently on the School's child protection register (held by the appropriate DSLs and the School's Welfare and Attendance Officer) who is absent without explanation for two days is referred to Social Services. In such a case, where the child is not at morning registration, contact is made as soon as possible to find out what explanation is given for absence. Depending on the response received, a referral will be made more urgently;
- Ensuring that records are passed on timeously (5 days) when pupils move school;
- Liaising with the Head in order to inform him / her of issues relating to safeguarding and child protection. This will also focus on promoting educational outcomes and the impact on these of welfare, safeguarding and child protection issues (including children with social workers);
- Liaising with the senior mental health lead (Director of Wellbeing) and their team;
- Promoting supportive engagement with parents/carers to promote welfare and safeguard children, including families with challenging circumstances.

ii. Training

- Updating their own safeguarding training at least every two years to understand assessment processes for early help and intervention for vulnerable children and maintain a working knowledge of the conduct of child protection case conferences and reviews in order to attend and contribute effectively to these meetings as required;
- Remaining alert to the well-being and specific needs of all children, especially those with special educational needs (SEN) or disabilities, those with relevant health conditions and young carers. Knowing how to identify, understand to and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk;
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and School leadership staff;

- Understanding the importance of providing information and support to childrens' social care in order to safeguard and promote the welfare of children;
- Understand the lasting impact that adversity and trauma can have on children(including mental health, behaviour and educational outcomes);
- Are able to understand the unique risks associated with **online safety** and are confident that the School is doing all it reasonably can to limit the risks from the School's IT systems. DSLs should have the relevant knowledge and capability to keep all children safe online while at School, and when learning remotely, especially those with SEN (See KCSIE, 2021, Annex D), including knowledge of the School's IT Acceptable Use policies, Internet filters and monitoring systems (Smoothwall) and other measures undertaken to educate pupils, staff and parents on safe internet and IT use;
- Ensuring each member of staff has access to, and understands, the School's safeguarding and child protection procedures, especially new, part-time and volunteer staff. Providing support to staff during the referrals processes and to consider the link between safeguarding, welfare and educational outcomes.

iii. **Raising Awareness**

- Formally reviewing the School's Safeguarding and Child Protection policy annually and making Governors aware of their statutory responsibilities;
- Remedying any weaknesses or deficiencies in the School's policies or procedures without delay, and bringing such changes to the attention of Governors, parents and pupils as appropriate;
- Encouraging all staff to adopt a culture of care, vigilance and listening to children, taking account of their wishes and feelings;
- Encourage a culture of listening to children and taking into account their wishes and feelings. Consider how to build the trusted relationships that facilitate communication between children and staff;
- Considering how children may be taught about safeguarding matters and responsibilities. This may be part of an assembly schedule or an appropriate PSHEE programme;
- Organising the separate transfer of a copy of a child protection file for any new school or college should a child leave Highgate;
- Promoting the School's safeguarding and child protection policy and procedures among parents, including the School's role in referrals for abuse or suspected abuse of children.

iv. **Availability**

- During term-time a member of the DSL team across the School will always be available, usually in person or in exceptional circumstances by electronic contact

/ telephone, during School working hours for staff to discuss any safeguarding concerns;

- The School's educational visits procedures nominate senior staff emergency contacts for all trip leaders running school visits out of hours or during holiday periods. These senior staff may be DSLs or they will be able to contact DSLs if necessary;
- Concerns out of School hours or during holidays that may involve an immediate risk of harm to a child should be referred directly and without delay to the Local Authority or Police (see Useful Contact Details on page 2). DSLs should be informed that such contact has been made.

6 Supporting Children

We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. In these circumstances a child may feel helpless, humiliated and blame themselves. Our School will support all pupils by:

- Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying;
- Promoting a caring, safe and positive environment within the school;
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- Ensuring that children have access to a source of counselling, either at school or through an outside agency;
- Notifying Social Services as soon as there is a significant concern, after discussion with Haringey Children's and Young People's Service or the appropriate LA for the pupil concerned;
- Providing continuing support to a pupil who leaves the School, about whom there have been concerns, by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school;
- Gaining assurance that the employees of any other organisation supervising pupils on a different site have undergone the necessary checks.

7 Confidentiality

Highgate recognises that all matters relating to child protection are confidential, in the sense that they must not be generally discussed. The Head or relevant Designated Safeguarding Lead will disclose any information about a pupil to other members of staff only on a 'need to know' basis. All staff must be aware that they have a professional responsibility to share information with other agencies, through the defined school channels or otherwise, in order to safeguard children. All staff must be aware that they cannot guarantee confidentiality to a child when listening to any disclosure since an issue may need to be referred on. The School's Director of Wellbeing, the School's Counsellors, the School's Chaplain and the School's Nurses, in providing such counselling services as are

available within the School, are not in a position to guarantee confidentiality surrounding allegations of abuse made and will not do so.

There are also restrictions on the reporting and publishing of allegations against teachers and the School will make every effort to maintain confidentiality and guard against unwanted publicity for the individual concerned. These restrictions apply to the point where the accused person is charged with an offence or if the DfE / TRA publish information about an investigation or decision in a disciplinary case.

8 Supporting Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm or appears likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Leads and to seek further support as appropriate.

9 Teaching Children How To Keep Safe: Reducing Risks and Building Resilience

We recognise that the School plays a significant part in the prevention of harm to our pupils by teaching pupils about safeguarding and providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection. The school community will therefore:

- Have regard that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils on another site (see the School's Educational Visits Policy);
- Establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to;
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty, highlighting the role of the School Nurses, School Chaplain, School Counsellors and Pupil Welfare Officers in particular, in this regard;
- Ensure that the children in the Senior School are aware that there are School Prefects to whom they can turn, as an alternative to an adult;
- Promote the good use of mentoring by peers and nominated buddies for pupils new to the School in the house and form system;
- Include in the curriculum, assembly schedule and PSHEE programme opportunities and activities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help;
- Use our E-learning programme and IT Acceptable Use policies to promote the safe use of electronic equipment and the internet, so that (at an age-appropriate level) pupils have a better understanding of the risks posed by adults or young people who use the internet to bully, groom, abuse or radicalise other people;
- Be mindful of up to date resources to support internet safety, such as presentations to parents and pupils by Childnet International and other resources such as: *The Use of*

*Social Media for on-line radicalisation (DfE, July 2015), www.saferinternet.org.uk, and CEOP: www.thinkuknow.co.uk, *Teaching Online Safety In Schools (DfE, June 2019), Harmful online challenges and online hoaxes (DfE, February 2021);**

- Ensure we provide the mandatory Relationships Education, Relationships and Sex Education and Health Education introduced in September 2020.

Links with other policies:

10 Whistleblowing

Highgate promotes a culture of vigilance, safety and care within the community of staff, pupils and parents. Raising concerns, however small, is actively encouraged and the Whistleblowing policy exists to further reassure staff and to set out clear procedures for reporting and handling concerns, including instances of poor or unsafe practice, failures in the Safeguarding arrangements and provision for mediation and dispute resolution where necessary. All concerns will be treated seriously, reflected upon and dealt with appropriately. Reminders about the Whistleblowing policy and its function are made to staff in regular meetings and INSET activities.

11 Physical Intervention/Touching a child

Staff must only ever use physical intervention as a last resort, and at all times it must be the minimal force necessary to prevent injury to another person or the pupil injuring him or herself. Staff should refer to the policy on physical restraint. We understand that evidence of physical intervention of a nature which causes injury or distress to a child may be considered under safeguarding or disciplinary procedures. Detailed guidance is provided in Appendix 5 of the School's Behaviour Policy.

12 Bullying, racist and online incidents

Staff should understand that, in dealing with allegations or incidents of bullying, peer on peer abuse, sexual violence or harassment or online conduct that involves direct abuse (or may be used to facilitate offline abuse) it may be necessary to invoke safeguarding procedures. Further guidance on such incidents, thresholds for reporting to external Safeguarding Partners and the procedures to follow are provided in the Safeguarding and Anti-Bullying Policies.

13 Health & Safety

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both within the school environment and when away from the school when undertaking school trips and visits.

14 Substance Abuse Education and Management Policy

Our Substance Abuse Education and Management Policy sets out how, in promoting the welfare of pupils, the School actively discourages the use of illegal drugs and harmful substances. Where concerns or suspicions surrounding a pupil's substance abuse nevertheless exist, the School will, in conjunction with parents, take steps and measures to safeguard the pupil.

15 Mental Health

There is an increasing recognition of the importance in promoting good mental health. KCSIE says that one of the purposes of the safeguarding guidance is: preventing impairment of children's mental and physical health or development.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to diagnose mental health problems; however, staff are well placed to observe children day-to-day and identify behaviours that suggest children may be experiencing a mental health problem or may be at risk of developing one. Adverse childhood experiences can impact on mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, then immediate action should be taken following this policy. All staff should be aware of how to escalate concerns and refer on. Please refer to the Wellbeing Policy for more detail.

16 Online Safety (KCSIE, September 2021, para 123 - 126)

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our approach to online safety aims to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes';
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-

consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We aim to ensure that online safety is a running and interrelated theme in our policies and procedures. This will include considering online safety in the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

We have a clear policy on the use of mobile phones:

- Pupils in the Junior School are not permitted to have mobile phones; these are only allowed in exceptional circumstances where written permission has been received by the Principal of the Junior School and the device does not have internet access;
- Pupils in Y7-11 should not have mobile phones out during school time;
- The use of School WiFi is filtered and monitored using Smoothwall.

These measures reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

The School's IT team ensure that the appropriate levels of security protection procedures are in place. The School's approach to online safety is reviewed annually using the 360 safe website risk assessment.

17 Special Educational Needs and Disabilities (SEND) (KCSIE, September 2021, para 185-187)

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. There can be additional barriers when recognising abuse and neglect in this group of children. These can include:

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

Appendix 1: Definitions and signs of abuse

The NSPCC website regularly updates its information on child abuse and is a useful resource for all staff in raising awareness of potential indicators of a child protection concern:

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

Staff at Highgate are provided with a definition of abuse and descriptions signs and forms of abuse and neglect during their induction and ongoing training, as detailed by KCSIE (September 2021), as follows:

KCSIE guidance on Types of Abuse and Neglect (Part 1, para 20-39 and Annex B): All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as

masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Child Sexual Exploitation (DfE, February 2017) defines CSE as a form of child sexual abuse. 'It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology'.

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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Peer on Peer Abuse: All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, sexting (youth produced sexual imagery), up-skirting, and initiation / hazing rituals. Staff should be aware of the School's policy and procedures for dealing with it (Appendix 5).

Signs of Physical Abuse

Physical Indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument (belt buckle, electric cord) on an infant in various stages of healing that are seen after absences, weekends, or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.

- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Signs of Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Complaints about pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vagina or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Inappropriate sexualised behaviours
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Signs of Emotional Abuse

Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height level substantially below norm.
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless-excitabile.

Signs of Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunizations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Assuming adult responsibilities.
- Reporting no carer at home

Child Sexual Exploitation (CSE, DfE, February 2017 and KCSIE September 2021, Para 32 and 36-38 and Annex B)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be at greater risk of child sexual exploitation. (Child sexual exploitation can also take place without any of these factors being present).

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

CSE (Feb 2017) states that child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Further information and potential indicators of CSE can also be found in **KCSIE** (September 2021, Annex B).

Further Information on Child Criminal Exploitation (CCE) (KCSIE September 2021)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into a criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories,

shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following are indicators of CCE:

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

Further information and potential indicators of CCE can also be found in **KCSIE** (September 2021, Para 32-35 and Annex B).

Further Information on County Lines (KCSIE, September 2021, Annex B)

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can

manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in [guidance published by the Home Office](#).

Further Information on Serious Violence (KCSIE, September 2021, Para 51-54)

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, 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 and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery

Further Information on Domestic Abuse (KCSIE, September 2021, Annex B)

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Controlling and coercive behaviour is outlined in Government guidance issued under section 77 of the Serious Crime Act 2015 as part of the Government's non-statutory definition of domestic violence and abuse. It is described as:

- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and
- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim Coercive control is a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim.

This pattern of abuse creates high levels of anxiety and fear. This has a significant impact on children and young people, both directly, as victims in their own right, and indirectly due to the impact the abuse has on the non-abusive parent. Children may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC](#)- UK domestic-abuse Signs Symptoms Effects
- [Refuge](#) what is domestic violence/effects of domestic violence on children
- [Safelives](#): young people and domestic abuse

Further Information on Honour-Based Abuse and Forced Marriage

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

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers¹⁰⁴ that requires a different approach (see following section).

Further Information on Female Genital Mutilation (FGM) (KCSIE, September 2021, Annex B)

The School acknowledges that it is a mandatory duty (Section 5B of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015) for teachers, along with social workers and healthcare professionals, to report to the Police where they discover that FGM appears to have been carried out on a girl under 18.

The Highgate Local Neighbourhood Police Team can be contacted by telephone: 0208 721 2673

Alternatively, the Metropolitan Police Service (MPS) may be contacted by telephone 101 (for non-emergencies) or 999 (if there is an immediate risk of harm).

Project Azure is the MPS response to female genital mutilation: Tel - 0800 028 3550, projectazure@met.police.uk

It is essential that all staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

It is carried out in the belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

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

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems

- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

In July 2020, HM Government released *Multi-agency statutory guidance on female genital mutilation* which included the following:

It noted that an effective local response to FGM should be underpinned by two key principles:

- safeguarding is everyone's responsibility: each professional and organisation should play their part; and
- a victim-centred approach should be taken: based on a clear understanding of the needs and views of girls and women affected by FGM.

It outlined the roles and responsibilities of organisations including schools:

- their organisation has a lead person (Philippa Studd – Deputy Principal (Pastoral)) whose role includes responsibility for FGM (this will often be the designated safeguarding lead). This person should have relevant experience, expertise and knowledge. Their role should include ensuring that cases of FGM are handled, monitored and recorded properly;
- there is a member of the organisation who has undertaken additional training and can be approached to discuss and direct difficult cases (this may be the 'lead person' mentioned above);
- their staff understand their role in protecting those who have undergone or are at risk of abuse, including FGM;
- their staff know to whom they should refer cases within their organisation and when to refer cases to other agencies;
- their staff understand the importance of timely information sharing both internally and with other agencies;

It also noted that organisations should have the following policies and procedures:

- there are policies and procedures in place to protect those who have undergone or are at risk of FGM. The policies and procedures should be in line with existing statutory and non-statutory guidance on safeguarding children and vulnerable adults. These policies and procedures must reflect multi-agency working arrangements; and
- policies and procedures are kept under review and updated to reflect structural, departmental, legal and other relevant changes.

Further Information on Children who need a Social Worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. This fact should be shared by social work and DSLs should consider this as a matter of routine when planning how to support pupils and to inform decisions about safeguarding and promoting welfare.

Further Information on Looked After Children Education

- The Head will appoint a designated teacher to promote the educational achievement of a child who is looked after should one (or more) join the School. The School will ensure that this designated teacher has the appropriate training and support required, in addition to information related to the child's legal status, contact details with birth parents or those with parental responsibility, care arrangements and the delegated authority to the carers, and the child's social worker and virtual school head from the local authority that looks after the child.
- In accordance with "Guidance about the designated teacher for looked after children" (DCSF, 2009) the designated teacher will: promote a culture of high expectations and aspirations for how looked after children learn, make sure the young person has a voice in setting learning targets, be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning, make sure that looked after children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home and will have lead responsibility for the development and implementation of the child's personal education plan (PEP) within the School.

Further Information on Children Missing Education

- A child going missing from an educational setting, particularly on repeat occasions, is a potential indicator of abuse and neglect. In accordance with the School's Attendance policy, the School will contact the appropriate LA if any concerns arise regarding the repeated, prolonged or unexplained absence of a child in order to help identify any potential risk of abuse, including sexual abuse or exploitation and help prevent the risks of the child going missing in the future.
- The School will agree with the relevant LA the regular interval that the School will inform the LA of any pupil who fails to attend School regularly, or has been absent without the School's permission for a continuous period of 10 days or more.
- The School will jointly work with the LA (or Education Welfare Services) when making reasonable enquiries where a pupil is absent for 10 days following on from a period of legitimate absence or is absent for 20 consecutive days where the absence is unauthorised.

- Whenever a child of compulsory school age leaves the School before completing the School's final year, or joins after the start of the first year, the School has certain legal responsibilities to inform the LA in the area of the child's residence.
- For more details of the procedures for dealing with missing children, staff are directed to the School's Attendance Policy and the London Safeguarding Children Board procedures, which may be viewed (and downloaded) at the London SCB website (www.londonscb.gov.uk). Part A Core Procedures, Section 1.3, *Definitions of Abuse and Neglect*: www.londoncp.co.uk

Further Information on Elective Home Education (KCSIE, September 2021, Para 165-168)

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will try to work with the LA and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Further Information on Private Fostering (KCSIE, September 2021, Para 319-322)

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

Appendix 2: Safeguarding Code of Conduct for Staff – includes the Low-Level Concern Policy

Legal Requirements:

KCSIE (September 2021) requires all staff members to be aware of the systems within Highgate which support the safeguarding of children. These include: the School's Safeguarding and Welfare (Child Protection) policy, the identity of the School's Designated Safeguarding Lead (DSL) and his / her Deputies and a Code of Conduct for staff.

Purpose of the Code of Conduct for Staff:

All members of staff have a role to play in safeguarding children. The Code of Conduct draws together guidance to staff about behaviour and actions required so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil. It should be read in conjunction with the School's policies on Behaviour and Safeguarding and its Disciplinary Procedures.

General Principles:

The School has a responsibility to provide a safe environment in which children can learn; members of staff should always act in the interests of the welfare of each individual child. To assist them in so doing, members of staff need:

- specifically to be trained in children's safeguarding, to read and adhere to relevant documentation (which includes the School's Safeguarding and Welfare policy, Part 1 and Annex B of KCSIE for staff working directly with children/Annex A of KCSIE for staff not working directly with children and this Code of Conduct);
- and generally to be aware of their responsibility to raise with and report concerns about any child to the School's DSL or to Social Services
- seek advice from the School's DSL about matters affecting, or with the potential to affect, children's welfare and safety.

While the School will take responsibility for providing training and auditing its effectiveness, members of staff have a responsibility for maintaining their understanding of safeguarding and welfare best practice. In particular, they are advised to adopt an 'it could happen here' attitude, and to remember that *anyone* (not only those with designated responsibilities) can, and may have to, make a referral to Social Services. Parental consent is not required for a referral to be made.

A useful summary of the role and responsibilities of all staff is provided by the Haringey Safeguarding Priorities: <https://haringeyscp.org.uk/p/professionals/key-messages-for-practice>

Routine considerations:

In order that staff do not place themselves or pupils at risk of harm or of allegations of harm to a pupil, members of staff must:

- Conduct themselves with pupils mindful of their teacher-pupil relationship and their legal position of trust, avoiding any sense of inappropriate informality, friendship with a peer or of favouritism. This includes those former pupils in Year 14, thus reducing the risk of a perception that anything in breach of the Code of Conduct may have had its origins in the period when the pupil was still in School;
- Dealing with pupil infatuation - if a staff member is concerned about the attachment a pupil has towards them, they should speak to a DSL for support immediately;
- Staff are expected to model good behaviour (for example in relation to their appearance, in terms of addressing pupils appropriately and when ensuring they discuss drugs and alcohol in an appropriate manner);
- Thus, staff should avoid situations where they are on their own with a pupil and, in such situations, plan ahead, and signal the arrangement to a line-manager. Measures will include: ensuring that there is easy sight into the classroom (no closed doors / door windows); having another member of staff or support staff in the vicinity. Where this is not practicable alternative arrangements should be considered and, if necessary, discussed and agreed with the DSL and line-managers;
- Avoid last-minute or informal arrangements for one-to-one tuition or coaching;
- Not give lifts in cars (or any private vehicle) to pupils, particularly one-to-one, other than in an emergency when a senior member of staff and / or the DSL should be informed of the circumstances as soon as is practicable;
- Ensure any out-of-school contact with pupils adheres to School policy, is necessary, and is 'open' (e.g. emails are copied into relevant line-managers); 'phone or text messages have to be authorised in the framework of risk-assessed educational visits and need to have the formal consent of parents;
- Seek immediate advice from your line-manager and a DSL if a pupil's interaction with you (in any form) seems inappropriate, out of the ordinary or makes you feel uncomfortable;
- Visiting Music Teachers, Learning Support Teachers, School Nurses, Mallinson Sports Centre staff, SpEx Department teachers and coaches have particular safeguarding vulnerabilities and requirements based on the nature of their roles. Line Managers and DSLs are mindful of the additional risks associated with these roles and provide induction advice and on-going monitoring and support as appropriate;
- All staff should be aware of our the schools Gift's and Hospitality Policy;
- Home visits (for example, those done for pastoral or admissions reasons) must not take place without the permission of the Lead DSL. Appropriate safeguarding processes (such as logging visits, and ensuring parents are fully communicated with and involved) must be in place.

Specific advice relating to mobile phones/devices, digital communication and social media:

- Pupils' mobile telephone numbers and text messages must not be used without the express, written permission of the pupils' parents and only in exceptional

circumstances (usually related directly to the safety and well-being of the child) with the prior approval of a line manager and a DSL;

- Mobile numbers of pupils must not be stored on a personal mobile and pupils should not have access to teachers' personal mobile numbers; (Heads of House and other pastoral leaders may keep confidential paper copies of pupils' telephone numbers, with the prior approval of the DSL, for exceptional pastoral circumstances);
- If necessary, e.g. in the context of a planned, risk-assessed educational visit, it is best practice to use a school-issued mobile to make contact with a pupil (e.g. on a trip or school outing) and to collect and use pupil telephone numbers only for use in an emergency. (Alternative strategies may be possible, e.g. asking other pupils to make contact using their mobile phones).

Digital communication:

- Transparency, openness and appropriate professional purpose must underpin all academic and pastoral interaction with pupils via electronic and digital means;
- The School's digital learning platforms (HERO / JUNO) should be the default forum for digital communication on academic matters between staff and pupils;
- Only School email addresses (@highgateschool.org.uk) should be used to give and receive appropriate messages between staff and pupils, and the system is readily available to scrutiny if necessary;
- It is good practice to keep email contact brief, formal and professional. If the e-communication with a pupil necessitates a more substantial response then consider more appropriate alternatives or copy in a line-manager (e.g. HoD or Head of House) to the exchange.

Facebook and other Social Networking Sites:

- Highgate staff must consider carefully the public nature of such sites and decide if it is appropriate to join;
- Be aware of the information about you that may be available on the web and social network sites and that may be open to parents, pupils and colleagues. If you have any concerns that anything exists that could compromise your professional reputation, or undermine the reputation of the School, inform your line-manager or the DSL without delay;
- Contact between staff and current pupils on Facebook and other social network sites is prohibited. Never allow an existing pupil to join your circle of "Friends";
- It is not acceptable for any member of staff to be Facebook "friends", or linked via any other social networking site, with a current or former pupil under the age of eighteen. In addition, the School continues to regard Year 14 pupils (Year 13 leavers) as pupils until 12 months after they begin their career at another institution. Even at this point, staff must consider carefully the extended network of "Friends" of former pupils that may include siblings and parents still within the School;
- Training and advice on privacy settings on social networking sites and their safe use can be obtained from the School's IT Helpdesk personnel or the Director of E-Learning;

- Members of staff should report any unwanted contact/ emails/ messages from pupils to a line-manager and the DSL immediately. Do not engage with any inappropriate digital contact from pupils.

Photography / Video recording / Audio recording:

- Any record taken of a pupil must be for legitimate educational reasons. The validity and necessity of such recording must be transparent, obvious and approved in advance by a line-manager or the DSL;
- Pupil consent must always be obtained; recordings must never be clandestine;
- Care must be taken if recording images of pupils in clothing other than normal school dress, e.g. sports kit or costume drama. It is never acceptable to record images where pupils may not be fully dressed, e.g. backstage in drama productions or changing rooms or sports venues;
- It is best practice to use designated School IT equipment to make or show recordings (or any other relevant material for educational purposes). Staff must not use their own personal IT equipment to record or show such images;
- Any temporarily stored recordings must be held on a School issued computer. They must not be held on a personal computer or equivalent IT device. Copies must not be made nor distributed or shared;
- Specific guidance on these issues for Pre-Prep pupils, in accordance with EYFS requirements, exists as a separate Pre-Prep School policy and is also included in the School's Safeguarding and Welfare policy (**See Appendix 8**).

Whistleblowing:

Highgate promotes a culture of vigilance, safety and care within the community of staff, pupils and parents. Raising concerns, however small, is actively encouraged and the Whistleblowing Policy exists to further reassure staff and to set out clear procedures for reporting and handling concerns, including instances of poor or unsafe practice, failures in the Safeguarding arrangements and provision for mediation and dispute resolution where necessary. All concerns will be treated seriously, reflected upon and dealt with appropriately. Reminders about the Whistleblowing policy and its function are made to staff in regular meetings and INSET activities.

Addendum:

Former Pupils (OCs) who may have recently graduated from School are employed by the School in various roles: e.g. Capital Projects Assistants, Junior School Professional Assistants and Chrysalis Scheme Fellows.

Separate guidance exists for these employees and will form part of their recruitment, induction and professional support programmes. The guidance should also be read and understood by all other staff. (**See Appendix 9**)

If any member of staff has any concerns about the interaction of these employees with other members of staff or current pupils then they are encouraged to contact their line manager or a DSL without delay.

Low-Level Concerns Policy

The School wants to create a culture in which all concerns (no matter how small) about adults (including allegations that do not meet the harm's threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. The help of all staff in doing this is critical. Safeguarding is everyone's responsibility.

Purpose:

We want to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour, which are set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

Definitions:

- 'A low-level concern' is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the School may have acted in a way that:
 - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
 - does not meet the allegation's threshold or is otherwise not deemed serious enough to consider a referral to the LADO.
- 'All Staff' should be interpreted very widely to mean anyone associated with the organisation – i.e. whether working in or on behalf of the organisation, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governance Body
- 'Lead DSL' ('Safeguarding Lead') means the person in an organisation with overall safeguarding responsibility

Aims:

This policy should:

- encourage an open and transparent culture;
- enable the School to identify concerning, problematic or inappropriate behaviour early;
- minimise the risk of abuse; and
- ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Examples include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.

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

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. As explained below, once staff share what they believe to be a low-level concern, that determination should be made by the Head or Safeguarding Lead.

Referring, Processing, Recording and References:

i. Referring:

- Refer any concerns to the Lead DSL. Please do so within 24 hours of the concern (although it is never too late to share a concern). If the Lead DSL is unavailable or the concern is about them then please refer to the Head. If the low-level concern is about the Head please pass to the Chair of the Governors.
- Staff are encouraged and should feel confident to self-refer if they are in a position that may be misinterpreted, might appear compromising to others or on reflecting they realised they have behaved in a way that falls below expected professional standards.

ii. Processing:

- Where a low-level concern is reported as much evidence as possible will be gained, which may entailspeaking to the person raising the concern, the individual involved and any witnesses. This will allow the behaviour to be categorised and the further actions decided upon. The decision is likely to be that the behaviour:
 - is entirely consistent with the staff code of conduct and the law,
 - constitutes a low-level concern,
 - is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary,
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies,
 - in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies

If there is any doubt we will seek no-names advice from the LADO.

iii. Recording and References:

- This will be done in writing including name, details, context and action taken with a rationale for the decision.
- The records will be regularly monitored for patterns of concern and for wider cultural concerns.
- References should not include low-level concerns unless they relate to issues that would normally be included. That said, where a low-level concern (or group of concerns) meets the threshold for a referral to the LADO and is found to be substantiated, it should be referred to.

Appendix 3: Disclosures and reporting arrangements

In the event of a pupil discussing an allegation of abuse with a member of staff, it is important:

- not to promise absolute confidentiality in order to elicit disclosure or further disclosure. The pupil should be advised that the chosen member of staff will listen carefully; will take any complaint seriously; will have the pupil's welfare uppermost in mind and may need – in that context and using the proper channels - to discuss any disclosure or allegations made by the pupil with other professionals
- not to ask leading questions if possible. Allow the pupil 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
- not to require the pupil to repeat distressing details, allowing for the fact that disclosures of abuse are of their nature distressing
- to write down as accurately as possible the details of the disclosure at the time (including questions asked and answers given, if possible) or immediately afterwards, if it is not practicable to do so contemporaneously

In the event of a member of staff needing to report a disclosure or a suspicion of abuse, the Head (or the Principal of the Pre-Preparatory or Junior Schools) should be informed immediately or, in his absence, the Principal Deputy Head. A Designated Safeguarding Lead should also be informed.

It is important that any member of staff should feel able to bring any suspicions about any person (whether suspicions about another member of staff, for example, or a parent of a pupil) to the Head, Deputy Head or Principals of the Junior and/or Pre-Preparatory School. The well-being of the child must always take priority. The School's Whistle-Blowing policy should offer additional reassurances to staff.

Highgate underlines the importance of staff being able to voice concerns about any child's welfare and an "open door" policy is encouraged in this important respect by the Head, the Principal of the Junior School, and the Principal of the Pre-Preparatory School. Staff will be encouraged and supported in fulfilling their professional responsibility for the safeguarding of children.

The Head (or the Principal of the Pre-Preparatory or Junior Schools or the Principal Deputy Head) will take notes of the disclosure or suspicion and, having ascertained the facts of the allegation (if known), will consult the relevant LADO (Local Authority Designated Officer – the acronym still used by Haringey LA) immediately or as soon as is practicable and certainly within one working day. He will not conduct an investigation until the LADO has advised whether a formal referral is necessary.

In the event of an allegation being made against a member of staff, both the Head and the LADO will have regard to the child's safety and to the potential for damage to the

reputation and career of the member of staff where the allegation proves false. In this context, it is imperative that all teachers understand the need for discretion and tact: gossip can inflame difficult and sensitive situations. Where a teacher is suspended pending an investigation, it must be understood that such a suspension is a neutral act, does not suppose guilt on the part of the suspended teacher. Suspension is not the default position and, in discussion with the LADO, all reasonable options to avoid suspension will be considered prior to taking that step.

Contact details for Haringey LA Children's Services and Safeguarding Referral Team are provided on page 3 of the Policy and on the aide-memoire (a useful wallet-sized fold-out card summarizing key information on policy and procedures in respect of Child Protection is also available to all staff); staff need to remember that, while Highgate lies in Haringey, it may be necessary to report to another LA, depending on the nature of the disclosure and the location of the child's home.

Appendix 4: The Counter-Terrorism and Security Act – The Prevent Duty, June 2015

Highgate's safeguarding policy includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

Definition:

Radicalisation refers to the process by which a young person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalization of young people.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Extremism is "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs."

Potential Indicators:

- **Vulnerability** – Identity crisis, personal crisis, personal circumstances, unmet aspirations, criminality.
- **Access to extremism:** Association with individuals or groups known to be involved in extremism, accessing the internet to contact groups associated with extremism or material promoting extremism, contact with extremist organisations or training, involvement in distributing extremist material, involvement in demonstrations or fund-raising for extremist causes, evidence of sympathy with extremist groups and / or views.
- **Experiences, Behaviours and Influences:** Peer, social, family or faith group rejection? Evidence of extremist ideological, political or religious influence on the child? Personal and emotional impact on the child of international events in areas of conflict or civil unrest leading to the development of extremist views? Significant shifts in the child's conduct to suggest new social influences? Conflict with family or school over beliefs, lifestyle, dress choices? Evidence of support (verbal or written) for terrorist acts or extremist groups / views? Has the child witnessed, or been the victim of, racial or religious hate crime or sectarianism?

- **Travel:** Is there a pattern of travel within / outside the UK for the purposes of extremist activity? Has the child travelled for extended periods of time to locations associated with extremist activity? Has the child ever sought to disguise their true identity?
- **Social Factors:** Experience of poverty, disadvantage, discrimination or social exclusion? Lack of meaningful employment or engagement appropriate to their skills? A lack of affinity with others or social exclusion from their peer groups? Learning difficulties or mental health needs? A simplistic or flawed understanding of religion or politics? Involvement with crime? A foreign national, refugee or awaiting a decision on their immigration status? Insecure, conflicted or absent family relationships? A significant adult in the child's life who has extremist views or sympathies?

Statutory Prevent Duty Obligations:

Highgate acknowledges that, under the Prevent Duty (June 2015) the School has a duty:

- To continually assess the risk of our pupils being radicalised or drawn into terrorism.
- To build our obligations under the Prevent duty into our existing local safeguarding partnerships, policy and processes.
- To raise the awareness of staff, through appropriate training, so that they are equipped to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- To ensure that our school IT systems are safe and protected from terrorist or extremist material through appropriate filtering and monitoring systems. Pupils will also be taught about online safety more generally.

Prevent Duty Referral Process:

Where a member of staff at Highgate has concerns that a young person might be considering extremist ideologies and / or may be radicalised or would benefit from specialist support to challenge extremist ideologies contact with the School's DSLs should be made without delay.

The DSLs and Senior Pastoral staff will discuss these concerns and will consider seeking external advice and guidance where necessary and appropriate. They will refer young people on to Haringey's Channel Panel under the local Prevent Duty strategy.

Concerns about a child, young person, or a family will result in a referral to the SPA (Single Point of Access)/MASH Team (Haringey), they will assess their needs in terms of safeguarding and liaise with the Prevent Coordinator regarding any extremism related concerns. Contact details below:

- 020 8489 4470 during office hours, or 020 8489 0000 out of hours (including weekends)

If the concerns are about an adult then a referral will be made to the Haringey Prevent Coordinator, who will assess their needs in terms of any extremism related concerns and liaise with relevant services, such as adult social care regarding any safeguarding issues. Contact details below:

- 020 8489 3884 or 020 8489 1280 (office hours only)
Email: prevent@haringey.gov.uk

Prevent referrals will be submitted according to the guidance offered by Haringey, and other local authorities, and Highgate will contribute to multi-agency Channel panels as necessary to offer the most appropriate support to the pupil and / or family.

Prevent course produced by the Home Office has also been undertaken by all teaching staff. Prevent Duty reminders for staff are repeated annually during Safeguarding Policy Induction and INSET and at regular staff briefings throughout the year.

Please note that the useful numbers and contact details set out below are not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the School's normal emergency procedures should be followed.

Prevent Duty Monitoring and Review:

Our response to the Prevent duty, the training of staff and the monitoring of pupils will be overseen by the Senior Designated Safeguarding Lead and will be formally reviewed on an annual basis by the Designated Safeguarding Leads' Committee.

Monitoring and review will include:

- Leadership and training at Senior Management and Governance level on fulfilling our Prevent obligations
- A commitment to working in partnership with other agencies
- Providing appropriate training for staff, including the risk of radicalisation within our Safeguarding policy and procedures
- Embedding opportunities within the curriculum and co-curricular activities to actively promote British values and to develop the critical thinking of pupils
- Continuing to promote e-safety among the pupil body
- Implementing protocols to log visiting speakers to the School, checking their suitability and monitoring the content of such presentations.

Useful Information and Contact Numbers:

Please note that the useful numbers and contact details set out below are not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case dialling 999 or invoking the School's normal emergency procedures should be the immediate course of action.

Staff can contact the local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.

The Department for Education has dedicated a telephone helpline (**020 7340 7264**) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to **counter.extremism@education.gov.uk**. The helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the School's normal emergency procedures should be followed.

The UK Anti-Terrorist hotline: 0800 789 321 / Crime Stoppers: 0800 555 111
www.gov.uk/report-terrorism or www.gov.uk/report-suspicious-activity-to-mi5

Online Channel Awareness Course for Staff:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

Online Prevent Awareness Course for Staff (Ongoing via Induction and Staff INSET):

<https://www.elearning.prevent.homeoffice.gov.uk/>

Appendix 5: Peer on Peer/Child on Child Abuse Policy (KCSIE 2021, Part 5)

Contents:

- Introduction
- What is Peer on Peer Abuse?
- Fundamental Principles
- Harmful Sexual Behaviours (HSB)
- How can pupils and parents/carers report abuse?
- Responding to concerns or allegations
- Handling online concerns
- Monitoring, Raising Awareness and Liaison
- Staff Training
- Pupil Education
- Further Information

Introduction:

The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and of the School policy and procedures for dealing with it.

This annex to the Safeguarding Policy draws upon the guidance in *KCSIE* (September 2021) Part 5 and *Sexual Violence and Sexual Harassment between Children in Schools and Colleges* (DfE, September 2021).

It should be read in conjunction with the rest of the Safeguarding and Welfare Policy, Anti-Bullying Policy, Behaviour Policy and the IT Acceptable Use Policy and any additional relevant guidance issued by local Safeguarding Partners (Local Authority, Clinical Practitioners or Police).

Please note that whilst this policy has been updated to take account of the updates in KCSIE 2021 and the update to Sexual Violence and Sexual Harassment between Children in Schools and Colleges, the policy will be further updated during the session 2021-22 based on the Anti- Sexism and Sexual Violence Plan and in consultation with pupils, parents/carers and staff.

What is Peer on Peer Abuse?

Peer on peer abuse, where a pupil's behaviour is likely to cause significant harm to other pupils, can take many forms:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;

- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse) (sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Fundamental Principles:

- **The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment** and it is never acceptable and it will not be tolerated.
- The **systems** in place should be clear (and they should be **well promoted, easily understood and easily accessible**) for children to confidently report abuse, knowing their concerns will be treated seriously and that they can safely express their views and give feedback. All systems, processes and policies should operate with **the best interests of the child at their heart**.
- **Children may not find it easy to tell staff about their abuse verbally.** Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of School staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. **If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.**
- **The School's initial response to a report from a child is incredibly important.** How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. The Designated Safeguarding Lead (and their deputies) will understand what the Early Help process is and how and where to access support (schools can manage

internally and seek early help). The School's risk assessment will also consider whether there may have been other victims.

- **Addressing inappropriate behaviour** (even if it appears to be relatively innocuous) **can be an important intervention** that helps prevent problematic, abusive and/or violent behaviour in the future.
- It should be **recognised that an initial disclosure to a trusted adult may only be the first incident reported**, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse; keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. Sexual abuse may be accompanied by other forms of abuse.
- Although it is more common for girls to be the victims and boys the perpetrators, we will take an **equally robust stance for incidents** of sexual violence or sexual harassment **between children of the same sex** as it would if it occurred between different sexes.
- **Technology is now a significant component in safeguarding and wellbeing issues**, children are now at risk of online abuse as well as face to face, and the two may be concurrent.

All staff should:

- be aware that children can abuse other children (often referred to as peer on peer abuse). And that **it can happen both inside and outside of school and online**. They should be aware of the forms that it can take;
- be able to **recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports**;
- **be clear as to the school's policy and procedures** with regards to peer on peer abuse and **the important role they have to play in preventing it and responding** where they believe a child may be at risk from it. This includes understanding how allegations of peer on peer abuse will be recorded, investigated and dealt with and how alleged victims, perpetrators and any other child affected by peer on peer abuse will be supported;
- should understand, that **even if there are no reports in their schools or colleges it does not mean it is not happening**, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their Designated Safeguarding Lead (or Deputy). **They should adopt an attitude that it could happen here**;
- **understand the importance of challenging inappropriate behaviours between peers**, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. **Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and violent**

behaviour in future. Challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts is also crucial to ensuring a zero-tolerance approach;

- be able to **reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem** by reporting abuse, sexual violence or sexual harassment. **Nor should a victim ever be made to feel ashamed** for making a report;
- be aware that while all children should be protected, it is important to **recognise that some groups of children are potentially at greater risk of harm**. Girls, children with SEND and LGBT children are at greater risk. Perpetrators are more likely to be boys.

The School is committed to the prevention, early identification and appropriate management of peer-on-peer abuse both within and beyond the School. In particular, we will:

- Take a contextual whole-school approach to preventing and responding to peer-on-peer abuse;
- Adopt an educational, preventative, pro-active approach in creating a culture that does not tolerate peer on peer abuse, rather than a solely reactive response to (alleged) incidents of peer-on-peer abuse;
- Respond to all reports and concerns including those that have happened outside of school and online.
- Promote this policy to pupils, staff and parents to ensure that our community is safe and that appropriate and prompt action is taken in response to any concerns or incidents;
- Review the policy, at least annually and with any updates in the interim as may be required, to ensure that it continually addresses the risks to which pupils are, or may be, exposed to.

A Safeguarding Approach:

- Reports of sexual violence and sexual harassment are complex to manage and it is essential that those children (allegedly) subject to abuse are supported and protected as a priority.
- The School's initial response to an allegation of abuse will reassure the child that they are being taken seriously, they will be supported and they will be kept safe. Staff will listen, respond and record such a disclosure in accordance with the School's Safeguarding policy best practice.

- Many children who present with harmful behaviour towards others, in the context of peer-on-peer abuse are themselves vulnerable and any sanctions that may be applicable via the School's Behaviour policy will always be accompanied by consideration of appropriate pastoral support. That said, taking disciplinary action and still providing appropriate support are not mutually exclusive. They can, and will, occur at the same time if necessary.
- In accordance with the School's Safeguarding policy, the terms 'child' and 'children' in this annex are defined as a person aged under 18 but the School's starting point is that the response to peer-on-peer abuse should be the same for all pupils, regardless of age. There is, however, likely to be a more significant Local Authority and / or criminal justice response in relation to any pupil responsible for abuse who is aged 18 or over.

Harmful Sexual Behaviours:

Harmful sexual behaviour (HSB) is **developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive**. It's harmful to the children and young people who display it, as well as those it is directed towards.

All behaviour takes place on a spectrum and understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

The School will regard *any* report of sexual violence or sexual harassment very seriously and staff should be aware of, and alert to, the statistically gendered nature of sexual abuse in that it is more likely that girls will be subject to sexual abuse and that boys are more likely to be responsible for that abuse.

The NSPCC states that, "children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive". Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour.

As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is "*harmful sexual behaviours*".

For the purposes of this policy, harmful sexual behaviours can be defined as "Sexual behaviours expressed by children that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child or adult."

A continuum model to demonstrate the range of sexual behaviours presented by children may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it. See table below:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviour	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure compliance Intrusive	Instrumental violence which is psychologically and/or sexually arousing to the child
Shared decision making	Generally consensual and reciprocal	Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Informed consent lacking or not able to be freely given May include elements of expressive violence	responsible for the behaviour Sadism

Staff should **always** discuss **any** concerns regarding sexual violence or sexual harassment between children with a DSL.

Other Harmful Peer on Peer Behaviours

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of the behaviour continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

This could include, for example, whether the behaviour:

- is socially acceptable;
- involves a single incident or has occurred over a period of time;

- is socially acceptable within the peer group;
- is problematic and concerning;
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability;
- involves an element of coercion or pre-planning;
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power;
- involves a misuse of power.

A behaviour continuum can be a useful tool but it is not definitive or exhaustive. Staff should bear in mind that there are some aspects which may not be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse.

In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour. It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context.

In all cases a contextual safeguarding approach should be adopted and staff should always discuss any concerns regarding other, or multiple, forms of peer on peer abuse with a DSL.

How can pupils or parents/carers report abuse?

Pupils should contact any trusted adult in school to report peer-on-peer abuse. If they are worried about doing so, they could speak to a friend or parent/carer for support.

We will develop further ways to report concerns as part of our ASSV plan.

If you report a concern you will be **taken seriously and you will be supported and kept safe**.

Responding to concerns or allegations:

All concerns/allegations of peer-on-peer abuse will be handled sensitively, appropriately and promptly.

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of then **the member of staff should:**

- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

- not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to; wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made** (including date, time, who present, where the disclosure took place and reasons for this). Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- inform the Designated Safeguarding Lead (or Deputy), as soon as practically possible, if the DSL (or Deputy) is not involved in the initial report.

Ideally a report will be managed with two members of staff present (preferably one who is a DSL). Further details on best practice for managing and recording disclosures is contained earlier in this Safeguarding and Welfare Policy.

Any response will:

- Immediately consider how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted);
- Include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- Risk-assess and will treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. We will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, recognising that additional sanctioning work may be required for the latter at the appropriate point. We will also consider whether there may have been other victims;
- Take into account that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the School environment; and the child/children's online presence. Consider the risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines;

- Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and the potential complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- Consider the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so;
- If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care and/or the Police will be made immediately. Staff are aware that anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made;
- If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed;

Risk and Needs Assessment:

Where there is an incident of peer-on-peer abuse, the School will immediately carry out a robust risk and needs assessment in respect of each child affected by the abuse, consulting with local Safeguarding Partners as appropriate. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

These risk assessments will:

- Assess and address the nature and level of risks that are posed and/or faced by the child acknowledging that the needs and wishes of the child should be paramount in any decisions so that they can feel as much control over the process as is reasonably possible;
- Engage with the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the short and long-term;

- Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child;
- Reviewed the agreed intervention and support at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child and allows them to continue to safely access their education;
- A key consideration for DSLs, alongside progressing the safeguarding report and process, will be the important question of the victim and alleged abuser sharing classes and space at School, taking into account the School's duties to both safeguard children and to educate them. These decisions are likely to be complex and difficult and will be considered on a case-by-case basis. Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim;
- Where there is an allegation of rape, assault by penetration or sexual assault between peers at Highgate the alleged abuser may be temporarily excluded from School, pending further investigation by the Police and School. This may be in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged offender. Appropriate academic and pastoral support will be provided by the School during this period of temporary exclusion;
- The School will continue to liaise with the Police and Children's Social Care and adjust the risk assessment as necessary; it may be possible for the School to fulfil its duty to educate by removing the alleged abuser to alternative classes and activities from those that they share with the victim. Consideration would also be given to the circulation and routines of the children involved in order to keep them apart, as far as possible, on the School site (including during any before and after school activities) and on the journey to / from School;
- Victims of sexual harassment or violence, wherever it happens, are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the perpetrator(s) attend the same school. Risk management will take this into account;
- All of the discussions above will take place bearing in mind the needs and wishes of the victim at the heart of the process (supported by parents and carers as required); and
- Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

How will the DSL team respond to concerns or allegations of peer-on-peer abuse?

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

DSLs and other senior Pastoral staff will always use their professional judgement to determine next steps. The DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. DSLs will record the advice and the rationale for such decisions.

Where the DSL and other senior pastoral staff confirm, consider or suspect that the behaviour in question might be rape, assault by penetration or a sexual assault and an offence may have been committed, the DSL will contact the local Safeguarding Partner, and with their support refer to the police.

The School has a statutory duty to co-operate with safeguarding partners and will actively engage with its local partners in relation to peer-on-peer abuse, and will work closely with, for example, the local Safeguarding Partners where the children on our School roll live as well as Haringey local authority where the school is based. The School will discuss concerns/allegations of peer-on-peer abuse with local Safeguarding Partners where necessary, and particularly where wider safeguarding concerns exist and the management of an incident may require additional expertise and effective partnership working.

After consultation with the local Safeguarding Partner, the School will generally inform parents / carers of the referral, unless there are compelling safeguarding reasons not to (e.g. if informing a parent or carer may put the child at additional risk).

The DSL will discuss the allegations/concerns with the local Safeguarding Partner and agree on a course of action, which may include:

A – Manage internally

In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing pastoral support.

B – Early Help

The School may decide that the children involved do not require referral to statutory services but may benefit from early help from the local authority. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address nonviolent HSB and may prevent escalation of sexual violence.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).

C – Refer to children's social care (for a section 17 and/or 47 statutory assessment)

Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to local children's social care. At the point of referral to children's social care, we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, we (especially the designated safeguarding lead or a deputy) will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

We will not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school or college take do not jeopardise a statutory investigation. A risk assessment will help inform any decision. Consideration of safeguarding the victim, the alleged perpetrator(s), any children directly involved in the reported incident and all children (and adult students) at the school or college should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) will be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

D – Report to the Police

Any report to the police will generally be in parallel with a referral to children's social care (as above). Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. At this stage, we will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important we are supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

Where a report has been made to the police, we will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s)

and their parents or carers. We will also discuss the best way to protect the victim and their anonymity. In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the School continues to engage with specialist support for the victim and alleged perpetrator(s) as required. While continuing to proceed with an internal investigative process, in accordance with the School's Behaviour policy.

If the allegation is progressed through the criminal justice system, the School will not wait for the outcome (or even the start) of the Police investigation to offer appropriate support to the children involved. Whilst protecting the children and / or taking any steps in accordance with the School's Behaviour policy, the DSLs will continue to work closely with the local Safeguarding partners to ensure that any actions taken by the School do not jeopardise the Police investigation. If we have any questions we will ask the police who will do as much as they can to help (within the constraints of any legal restrictions).

If a child is convicted or receives a caution for a sexual offence, the School will review its assessment of risk to the children involved and the wider School community and will, in accordance with the Behaviour policy, hold a formal disciplinary Hearing where permanent exclusion from School is the likely outcome.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Whatever the School's response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Ongoing response

Safeguarding and supporting the victim

Any response by the School will consider:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they

- will be offered. This will however need to be balanced with the school or college's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB has been displayed;
 - the ages of the children involved;
 - the developmental stages of the children involved;
 - any power imbalance between the children. For example, is an alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
 - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
 - that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
 - are there ongoing risks to the victim, other children school staff?;
 - other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation;
 - other health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC);
 - Other support available.
- The victim will never be made to feel that they are a problem or that they should be ashamed for making a report.
 - The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.
 - The School's next steps and responses will be carefully considered and proportionate, in accordance with our Safeguarding approach. Effective communication with, and appropriate support for, the child (and their parents / carers) will be a priority.
 - Victims may not disclose all information immediately and ongoing dialogue will be kept open and encouraged. The School will offer the child the opportunity to nominate a 'designated trusted adult' on the staff to communicate with if that would be helpful.
 - A victim of sexual violence or harassment may be traumatised and may struggle in a normal classroom environment. The School will avoid any actions that may serve to isolate the child, especially from supportive peer groups, but if the child wishes to withdraw from some activities or work in a separate space then the School will make every reasonable effort to meet these wishes, in both the short and, if necessary, longer-term.
 - The School will do everything it can to protect the child from any bullying or harassment that occurs as a result of the report they have made.

Safeguarding and supporting the alleged peer abuser and young people who have displayed harmful sexual behaviour

- The School will do all that it reasonably can to balance its statutory priority to safeguard and support the victim (and / or the wider pupil body), alongside its obligation to educate and safeguard the alleged abuser;
- The School will be mindful of the age and developmental stage of the alleged abuser and the resultant stress of being the subject of an allegation, in addition to potential negative reactions from other peers and members of the School community to the allegations;
- The School will respond proportionately, on a case-by-case basis. The alleged abuser may have unmet needs and may pose a risk of harm to other children. HSB in young children may be (and often are) a symptom of their own abuse or exposure to abusive practices or harmful materials. A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. The School will seek the support and advice of children's social care, specialist sexual violence services and the Police in assessing how best to support the child concerned. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary;
- If the alleged abuser moves to another educational institution then the DSLs will ensure that the child's educational progress and support, ongoing needs, potential risk of harm to others are communicated effectively to the new School or education provider.

Safeguarding other children

- Consideration will be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required;
- Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school will do all we can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed;
- A whole school or college approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at the school are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

Handling Online Concerns:

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) is a form of peer-on-peer abuse. Consensual image sharing, especially between older children of the same age, may require

a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

Staff should pass on any concerns around this immediately to a DSL. A one page summary on handling these issues for all staff can be found [here](#). **The key consideration is for staff not to view or forward illegal images of a child.**

Where a report includes an online element, the DSL will refer to searching screening and confiscation advice (for schools) and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The linked advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Monitoring, Raising Awareness and Liaison:

The School actively seeks to prevent all forms of peer-on-peer abuse by raising awareness among Governors, Staff, Pupils, and parents about this issue.

This will include regular updates and information to the whole School community about the prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it promptly and appropriately.

All scenarios that decisions and actions will be regularly reviewed by the Designated Safeguarding lead and relevant policies will be updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Pupils will be regularly informed of the School's approach to such issues, including its zero-tolerance approach towards all forms of peer-on-peer abuse. Pupils will be encouraged to contribute to the School's understanding of such issues and to contribute to policy development via direct feedback to pastoral staff and such forums as School Councils and Form / House Captains' meetings.

Parents will be encouraged to talk to the School's pastoral staff on this issue, particularly on what they perceive the risks facing their children to be and how they would like to work with the School to address those risks, e.g. via questionnaires, discussion groups / workshops and policy reviews.

Staff Training:

Regular training and policy updates will be provided to ensure that all staff are clear about the School's policy and procedures with regard to preventing, recognising and reporting

peer on peer abuse. This will include scenario discussions, contextual Safeguarding, the identification and classification of potentially harmful or risky behaviours and the importance of taking seriously all forms of peer-on-peer abuse. It will also cover online safety annually.

The DSL team will receive regular updates on partnership and Early Intervention support from the local authority. We will also ensure they are aware of the local police arrangements.

Pupil Education:

The most effective preventative education programme will be through a whole-school approach that prepares pupils for life in modern Britain. Relationships Education for all primary school age pupils, Relationships and Sex Education (RSE) for all secondary school age pupils, and Health Education for all pupils in state-funded schools is compulsory.

Educating children about the nature and prevalence of peer-on-peer abuse via PSHEE, tutorials, assemblies, the wider curriculum and other appropriate forums. Pupils will be aware of what they can do to seek support if they witness or experience such abuse and the harmful effect that it can have on those who experience it.

Further Information:

For further information please refer to the relevant [London Child Procedures](#). See also [KCSIE \(September 2021\)](#) paragraph 455 for details of additional support available.

Appendix 6: Sharing Nudes and semi-nudes: how to respond to an incident: advice for education settings working with children and young people (December 2020)

In December 2020 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of the sending or posting of nude or semi-nude images by young people under the age of 18.

The UKCCIS guidance is non-statutory, but should be read alongside KCSIE and it should be followed unless there's a good reason not to do so.

This appendix includes the overview for all staff. Any incident would be followed up by a DSL who would be expected to follow the full guidance.

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared. All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with the School's child protection policies. The appropriate safeguarding lead person should be familiar with the full 2020 guidance from the [UK Council for Internet Safety \(UKCIS\), Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and should not refer to this document instead of the full guidance.

What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately.

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**. [In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent)].
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

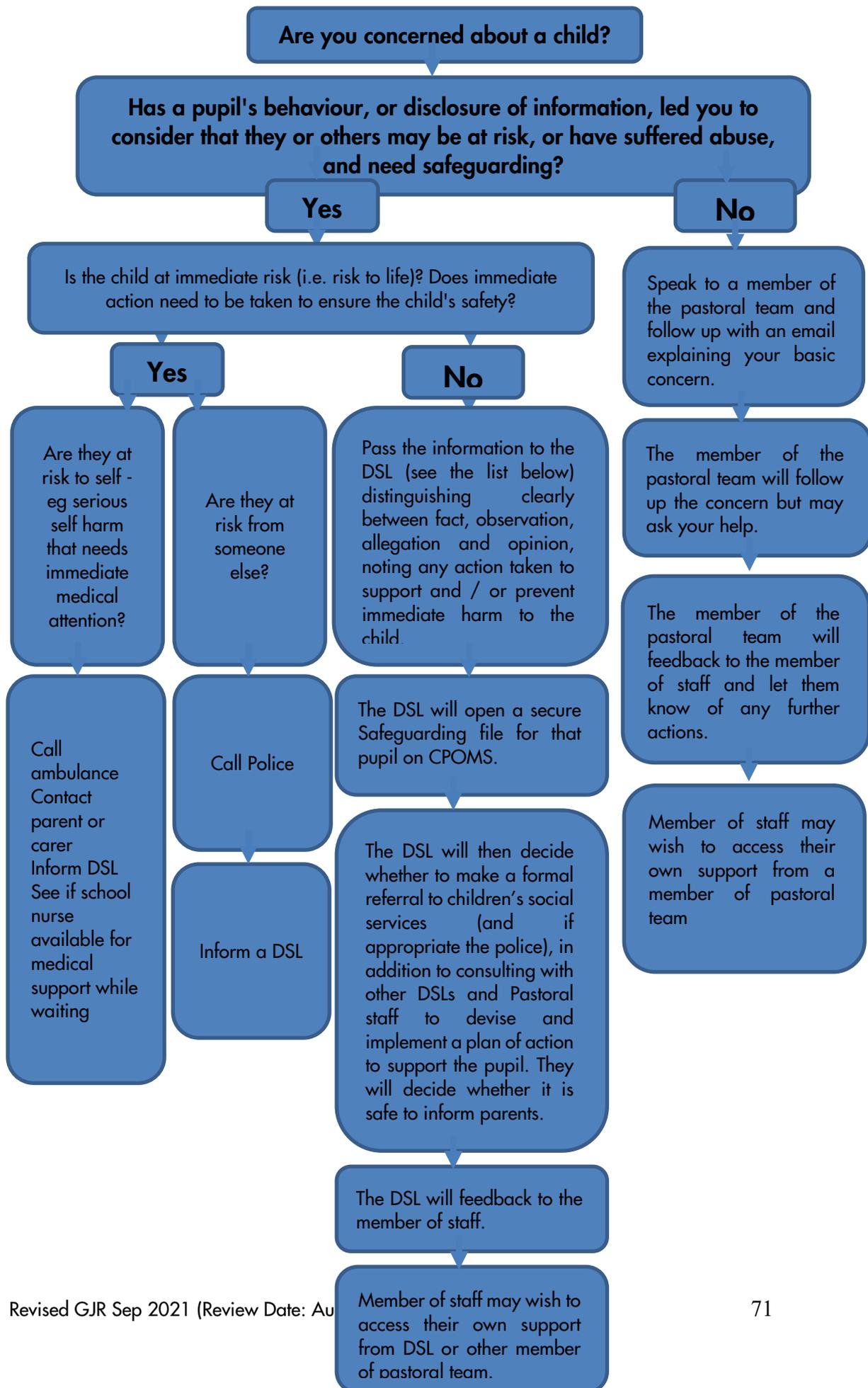
For further information

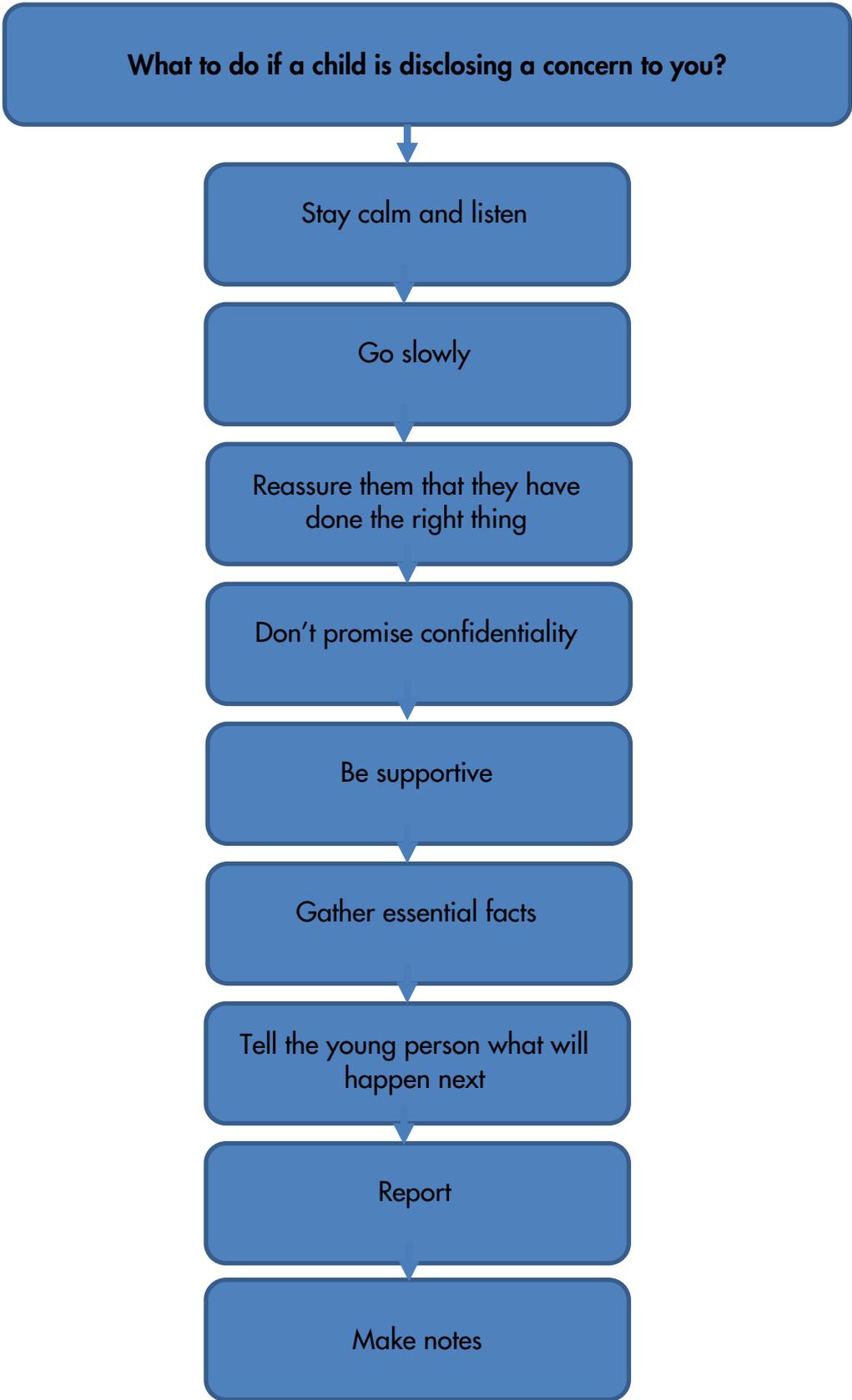
Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, 2020)* at www.gov.uk/government/publications/sharing-nudesand-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

Note on Searching, Screening and Confiscation of Devices

Should the School decide it needed to search, screen or confiscate a pupil device it would refer to government advice in [Searching, screening and confiscation at School](#).

Appendix 7: Responding to a concern flowchart





Where to find a DSL?

Pre-Prep

Gideon Zucker
Deputy Principal
Tel: 020 8347 4413



Sally Hancock
Deputy Principal
Tel: 020 8347 4419



Junior School

Philippa Studd
Deputy Principal
Tel: 020 8340 9193



Matthew Foley
Deputy Principal
Tel: 020 8342 7275



Senior School

Near Entrance Lodge
Graeme Robertson
Lead DSL
Tel: 020 8347 4440



In Dyne House
Louise Shelley
Senior Deputy Head
Tel: 020 8347 3574



Other Members of DSL Team

Kasia Wojtkowiak Compliance
Jonathan Murphy Director of Music
Natasha Creed Music Dept Manager
Clare Rodgers Head of JS Sport
Sarah Butterworth Chrysalis
Steph Pride Director of SpEx

In Central Building
Arthur Dabrowski
Acting Head of
Middle School
Tel: 0208 347
2127



In Dyne House
Verity Smith
Assistant Head of
Sixth Form
Tel: 0208 347
2127



In Charter
Building
Sam Pullan
Head of Lower
School
Tel: 0208 347
2190



In Charter Building
Enya Doyle
Acting Director of
Inclusion
Tel: 0208 347 2127



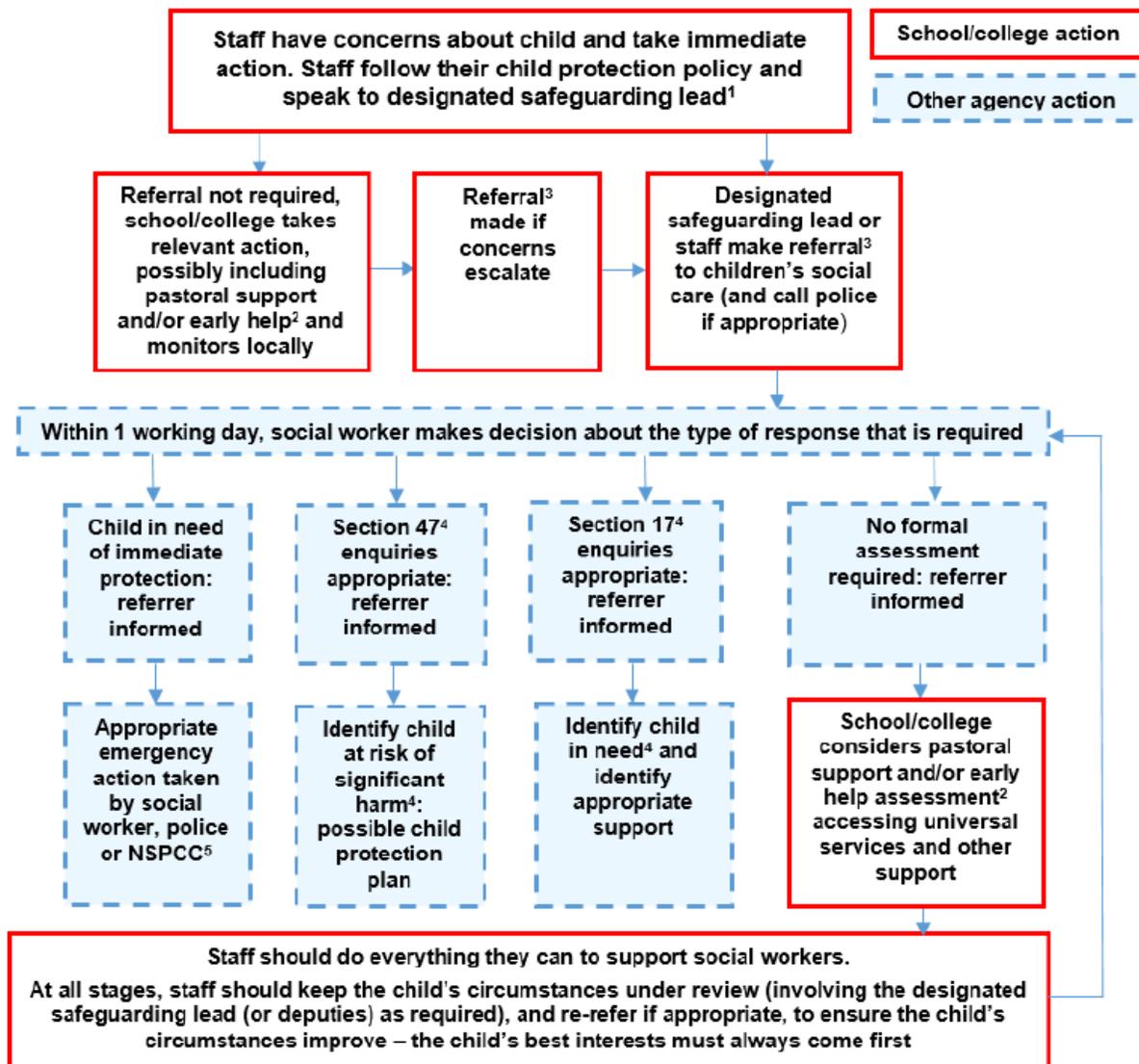
Other Help If you are worried about a child for any reason, contact their local MASH

(for example: Haringey MASH on 020 8489 4470 or their Emergency out-of-hours duty team on 020 8489 0000)

- **If you or a child is in immediate danger you should always phone 999.**

KCSIE Guidance on Actions where there are concerns about a child (KCSIE, September 2021, p.23)

Actions where there are concerns about a child



Appendix 8: Highgate Pre-Preparatory School

Policy on Safeguarding and Promoting the Welfare of Children in relation to the intimate care of young children

- Intimate care can be defined as care tasks of an intimate nature, associated with bodily functions, body products and personal hygiene which demand direct or indirect contact with or exposure of the genitals.
- The PP School is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. PP staff recognise that there is a need to treat all children with respect when intimate care is given.
- Children's dignity will be preserved and a high level of privacy, choice and control will be provided to them.

Our approach to best practice:

- All children who require intimate care are treated respectfully at all times; the child's welfare and dignity is of paramount importance.
- There is careful communication with each child who needs help with intimate care to discuss the child's needs and preferences. If the child prefers the help of parents, they will be contacted straight away.
- Children will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for themselves as they can, e.g. washing themselves,
- Each child's right of privacy will be respected. Careful consideration will be given to each child's situation to determine how many teachers/support staff will be present when the child needs help with intimate care. A second member of staff must be made available when intimate care is being provided and be able to support if necessary.
- Parents will be involved with their child's intimate care arrangements on a regular basis and the needs and wishes of parents will be carefully considered. There is regular and clear communication with all parents of children requiring intimate care. All parents are made aware, and reminded of, the School's policy and procedures regarding intimate care on a regular basis.

Policy for the Use of Mobile Phones and Cameras in the Early Years Foundation Stage

To ensure the safety and welfare of children in our care the Early Years Foundation Stage operates a policy for the use of mobile phones and cameras which stipulates that:

Staff / Volunteers / Parent Volunteers / Visitors / Students

- Personal mobile phones, cameras and video recording devices should not be used on school grounds during contact time with children. The only exception to this rule is in emergency situations.

- All personal mobile phones, cameras and video recording devices must be stored securely out of reach within the setting during contact time with children.
- During Forest School lessons and trips staff and parent volunteers may carry their own phones but should only be used in emergencies.
- Personal calls may be made on personal devices in non -contact time but not within teaching areas.
- If Staff / Volunteers / Parent Volunteers / Visitors / Students have a personal emergency they may use the Pre-Preparatory phone or may make a call on a personal device but not within teaching areas.
- Staff / Volunteers / Parent Volunteers / Visitors / Students must ensure that the admin team has up to date contact information and that staff make their families aware of emergency work telephone numbers.
- All Staff / Volunteers / Parent Volunteers / Visitors / Students are made aware that the use of personal mobile phones to take photos or videos is not permitted and that they only use the Highgate School equipment to take photos.
- We seek permission from the child before we take a photograph.
- Within the Early Years Foundation Stage staff regularly take individual or group photographs of the children in our care for educational purposes. These images may be used for display inside the Early Years Foundation Stage areas or on the School website. We also use the images for the teaching, observation and publicity purposes. We inform parents that images of their child may be taken for teaching, observation and publicity purposes
- In line with the School policy on Taking, Storing and Using Images of Pupils, unless the relevant pupil or his or her parent / carer has requested otherwise, the School will use images of its pupils for the above-mentioned uses.
- In accordance with the above-named School policy, any parent / carer who wishes to limit the use of images of a pupil for whom they are responsible should contact the Bursar in writing.
- We do not identify children in our internal teaching, observation or publicity displays without prior parental consent.
- We do not identify children in images used in our external material, such as a prospectus or on the School website.
- All images and recordings of pupils are stored on school equipment and are deleted once their specific educational purpose has been achieved.
- Copies of images and recordings are not distributed or shared.

Staff / Volunteers / Parent Volunteers / Visitors / Students will be educated on the importance and safety issues for themselves and children regarding this policy.

Appendix 9: Guidance for School Leavers and Pupils Working at Highgate School

DEFINITIONS

Year 14 – these are any pupils who have left Highgate, or a Partner School such as LAET, the preceding academic year before they begin their period of employment.

Old Cholmeleians (OCs) – any former pupil that left the school more than a year previously.

Junior School Assistant – pupils who recently left, known as Y14, employed in the Junior School.

Estate Assistant – current pupils and OCs (including Y14s), employed in the Estates department.

Chrysalis Fellow – Y14s or OCs employed in the Partnership department.

INTRODUCTION

This document aims to provide guidance and help support current pupils or recent School leavers of Highgate School during their employment as either a Junior School Assistant, Chrysalis Fellow or Estate Assistant. Any breach of this guidance will be regarded as a serious disciplinary offence leading to disciplinary action up to and including dismissal.

Highgate understands that it can be difficult adjusting from being a pupil to being an employee. In order to support you in what may be your first formal entry to the professional world, you will meet with a Designated Safeguarding Lead (DSL) and your line manager when you begin your contract. They will talk through this guidance with you and consider some common scenarios and challenges you may come across in making the transition from senior pupil to employee and colleague.

As a paid employee, all the School's employment and staff conduct policies apply to you without exception. You are now a member of staff, not a pupil, and it is important that you make this distinction in the way that you present yourself not only at School during working hours but also in your interactions in the wider community.

However, your status as a current pupil or recent leaver means that there are aspects of the School's Safeguarding policies that you must be mindful of and will have a bearing on how you will be required to interact with new colleagues (some of whom who may be your current/former teachers), current pupils and, potentially, your OC peers who are not employed by the School.

This is to protect you, your new colleagues / current and former teachers and the School from any incidents or situations that could undermine the School's excellent reputation as a safe place for learning and for the highest standards of professionalism.

If you are ever in doubt regarding acceptable conduct or appropriate professional interactions with others during your employment, you are encouraged to seek immediate advice from your line manager or a Designated Safeguarding Lead (listed at the end of this guidance).

RELATIONSHIPS WITH OTHER STAFF

You will be aware that it is a serious safeguarding and professional standards breach, in addition to potentially being a criminal offence, for a member of staff to form an inappropriate (e.g. romantic or sexual) relationship with a current pupil.

This is why the School's Safeguarding Code of Conduct for Staff (S & W policy, Appendix 2) states that:

'In order that staff do not place themselves or pupils at risk of harm or of allegations of harm to a pupil, members of staff must conduct themselves with pupils mindful of their teacher-pupil relationship and their legal position of trust, avoiding any sense of inappropriate informality, friendship with a peer or of favouritism. This includes those former pupils in Year 14, thus reducing the risk of a perception that anything in breach of the Code of Conduct may have had its origins in the period when the pupil was still in School'

Due to your relatively recent departure from Y13 at Highgate (or still being a pupil), the potential perception of 'grooming' (the abuse of a position of power or trust by a teacher or member of staff while you were still a pupil) should you become too personally close to a new colleague during the period of your employment is a serious professional allegation that you, your new colleagues and the School must be mindful of and do all that we can to prevent.

Please note therefore that a Y14 pupil, even if employed by the School, becoming involved in an intimate situation or relationship with a teacher would be regarded by the School as a serious breach of its Safeguarding Code of Conduct and would trigger a report to the LADO for the teacher concerned, in addition to a disciplinary investigation into the conduct of the Y14 pupil / employee.

Thus, a Y14 pupil / employee cannot begin a relationship with any Highgate staff (other than a Y14 peer), regardless of their job or level of seniority. Beginning a relationship refers also to any intimate behaviour, for example kissing or holding hands, all is expressly prohibited.

Misjudgements in this area are most likely to take place in more informal settings, such as socialising with colleagues at the end of a working week or end of term. Such gatherings are not proscribed for Y14 pupils / employees, but the School's rules for employees apply on or off the School premises.

Thus, the School requires **all** colleagues to be mindful of the professional obligations and boundaries that apply, bearing in mind the important information and consequences outlined above.

Returning OCs, should not enter into a relationship with a member of staff who taught them or was in a position of trust with them in the past.

RELATIONSHIPS WITH CURRENT PUPILS

Highgate recognises that pupils may form close personal relationships with other pupils. Whilst Highgate does not wish to interfere with these existing personal relationships, it is necessary for those current pupils / recent leavers / OCs seeking employment by the School to declare these relationships in their interview prior to when they start their employment at Highgate.

Since such ongoing relations between an employee and a current pupils would be a serious breach of the School's Safeguarding policies, the relationship must end, or be suspended for the period of the contract, prior to them starting their employment if offered the role. This necessary implication of the School's employment requirements will be made clear during the appointment process and any candidate who feels that it will be a problem should withdraw their application.

The information declared at interview will be recorded on your personal file and may be shared with your line manager and the Designated Safeguarding Lead Team. The information will be treated in strict confidence.

It should be readily apparent therefore that, once a current pupil or recent School leaver has started their employment, they also cannot start a close personal relationship with any current Highgate pupil.

CONFIDENTIALITY

Confidentiality is something that may be spoken or given to employees that must not be discussed with another. The appropriate sharing of information between Highgate School colleagues is an essential element in ensuring our pupils well-being and safety.

However, you must not share any confidential information regarding Highgate School colleagues or the School's operation to any current or former pupils including any person external. This includes any information obtained during social settings.

SOCIAL NETWORKING SITES

Highgate Safeguarding policy states that contact between staff and current pupils on Facebook and other Social Network Sites is prohibited.

However, Highgate recognises that if current pupils or recent School leavers have Social Networking Sites, that they would already have contact with current pupils. Highgate requires that during your employment you do not post anything that could compromise your professional reputation or undermine the reputation of the School. Furthermore, you must not make any new connections with any current pupil/s.

If any information about the School, its employees or its business that could cause harm or undermine the School's reputation is found to originate in the digital activities of an employee then this will trigger a disciplinary process that could result in dismissal for gross misconduct.

If the School leaver is offered another employment contract that is 12 months after the academic year that they were a pupil, then all current pupils who are connected on Social Networking sites must be removed.

Appendix 10: Safeguarding Staff Supervision Policy

Introduction

Supervision is a fundamental task that managers undertake to support the development of skills and practices of their designated safeguarding leads (DSLs) and deputies. Following the inquiry of Victoria Climbe in 2003, Lord Laming stated that: *'All staff working directly with children must be regularly supervised'*

Supervision is a method of supporting staff so they can provide for the needs of their students. Safeguarding supervision is a regular, planned, accountable two-way process which should offer emotional support and develop the knowledge, skills and values of an individual, group or team. Its purpose is to monitor the progress of professional practice and to help staff to improve the quality of the work they do, thus improving outcomes for children as well as achieving agreed objectives. Supervision also provides an opportunity to ensure that codes of conduct and standards of practice are maintained therefore promoting a safe culture. This may be part of supervision or can take place separately especially where supervision is not given by the line manager/DSL.

The objectives and functions (Morrison (2005)) are:

- Competent accountable performance
- Continuing professional development
- Personal support
- Engaging the staff member with the School

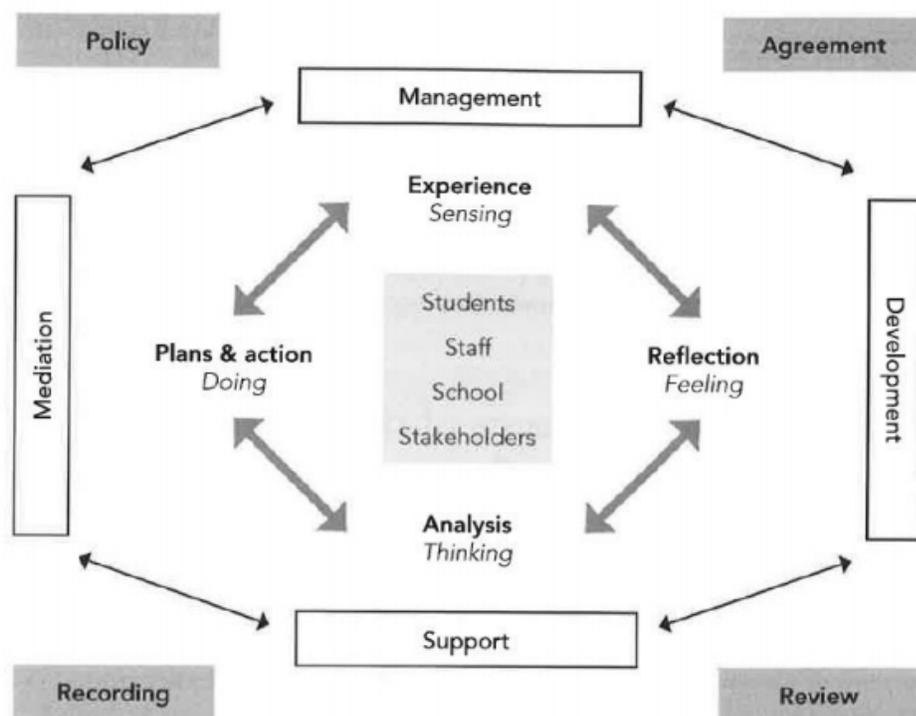


Figure 2.1: 4x4 model of supervision. Developed from Morrison T (2005) *Staff Supervision in Social Care* (3rd edition). Brighton: Pavilion Publishing and Media.

Purpose

The purpose of Safeguarding Supervision is to:

- Provide protected time to reflect on practice;
- Provide support with emotional wellbeing, resilience, picking up on demands and developing coping strategies;
- H82ave an opportunity to off-load, talk about how they are feeling when dealing with distressed students and the impact on their own life. It should feel restorative and help build resilience;
- Celebrate success;
- Review workloads and time management;
- Discuss and seek guidance on specific cases – review action plans, avoid drift. Provide a fresh eye, talk through intolerances, frustrations e.g. with other agencies/systems;
- Review CPOMS recording and key plans for all pupils to ensure they are up to date and that all actions are being actioned;
- Provide an opportunity where a member of staff can be challenged supportively and constructively with advice offered on areas for improvement;
- Allow for issues relating to the work place and to working practices to be identified and discussed including safer working practice and professional boundaries;
- Enable an opportunity for reflection, creative thinking and solution focussed thinking;
- Consider how their role fits with the rest of the school/other services and the community;
- Identify achievements and good practice;
- Consider appropriate CPD/training needs in relation to the safeguarding role.

Principles

- Safeguarding supervision is not related to and does not replace appraisal, but should compliment it;
- It is not counselling and a supervisor at times may need to refer a supervisee to other services such as counselling;
- The relationship between supervisor and supervisee should be positive and trusting;
- The school SLT/Governors should see supervision as an important aspect of the professionals' work and ensure adequate time is provided;
- Decision making on a child's records should be signed off by the DSL who remains responsible;
- Where supervision takes place across schools or with an independent person, confidentiality of individual children and families must be maintained. Case discussions will therefore be anonymised.

Arrangements

The following staff will meet at least once per-half term (more likely monthly or more frequently) and the meetings will have an agenda and some form of minutes taken.

Director of Wellbeing:

- The Director of Wellbeing will gain external supervision.

DSLs:

- The Lead DSL will be supervised by the Director of Wellbeing
- Senior School DSLs will be supervised by the Lead DSL
- Junior School DSLs will be supervised by the Principal of Junior School
- Pre-Prep DSLs will be supervised by the Principal of Pre-Prep
- Non-teaching DSLs will be supervised by Director of Compliance
- The Director of Compliance will be supervised by the Lead DSL

Senior School Pastoral Staff:

- The Heads of Section will be supervised by the Deputy Head (Pastoral);
- The Heads of House will be supervised by their link member of ST (a Head of Section or Deputy Head (Pastoral));
- The Heads of Year will be supervised by the Head of Lower School;
- Tutors in Y7/8 are supervised by the relevant Head of Year;
- Tutors in Y9-13 are supervised by the relevant Head of House.

The safeguarding arrangements as a whole are reviewed by the Safeguarding Governors.

Change Log			
Section	Change	Owner	Date
5 DSLs and Appendix 7	SAP added to the DSL Team	GJR	May 2021
Various	Full review for changes to KCSIE September 2021 and changed to DfE Guidance on Sexual Violence and Harassment September 2021	GJR	Aug 2021

Safeguarding and Welfare Policy, Update for 2021 – 2022

Approved by:



Chair of Governors (Mr Bob Rothenberg):

Date: 13 September 2021



Head (Mr Adam Pettitt):

Date: 13 September 2021