



## HEATH HOUSE PREPARATORY SCHOOL

### Safeguarding Policy

This policy applies to all children at Heath House, including those within our EYFS, and has regard for advice in and duties under: the *Children Act 1989 and 2004*; the *Education Act 2002*; the Education (Independent School Standards) Regulations 2014; the *Childcare Act 2006* and the *Statutory Framework for the Early Years Foundation Stage (2021) Safeguarding and Welfare Requirements*; Department for Education (DfE) guidance on *Keeping Children Safe in Education (September 2024) (KCSIE)*; *What to do if you're worried a child is being abused: Advice for practitioners (March 2015)*; *Working Together to Safeguard Children (2023)*; *Working together to Improve School Attendance (2024)*; *Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (February 2017)*; *Preventing and tackling bullying: Advice for headteachers, staff and governing bodies (July 2017)*; the *Prevent Duty Guidance: for England and Wales (2023) (Prevent)*, *Relationships Education, Relationships and Sex Education (RSE) and Health Education and Children and Social Work Act (2017)*.

This policy will be updated as needed, in line with any changes to legislation or procedures, and as a minimum at least annually.

Everyone employed by Heath House, and all ancillary staff, have a responsibility in relation to child protection, safeguarding and promoting the welfare of children. In most cases this will be the referral of concerns to the Designated Safeguarding Lead. In day-to-day contact with children at risk, members of staff have an opportunity to note concerns and to meet with parents and other associated adults.

Increasingly, schools are expected to work with, support and sometimes lead different agencies to enable the most appropriate form of intervention to take place. This policy aims to outline the role that the school will have, the procedures that staff should take and guidance on issues related to Safeguarding generally. It is not exhaustive. All members of staff should use, as a rule of thumb, the needs and safety of the child as being at the centre of any decision that they make. This policy is drawn up with reference to the Lewisham inter-agency procedures. The schools Safeguarding policy is given to all parents joining the school. It is also available on our website [www.heathhouseprepschool.com](http://www.heathhouseprepschool.com) in the policy documents section or on request from the school office.

**If you have any concerns related to the welfare or safety of a child, including online-safety and safeguarding (sometimes known as 'e-safeguarding') please contact the Designated Safeguarding Lead without delay. The school's Designated Safeguarding Lead is Mr Richard Laslett, Deputy Head Teacher. In Mr Richard's absence, please contact Mrs Emily Reid, School Development and IT Co-Ordinator.**

#### Definitions

The school uses the definition of *safeguarding and promoting the welfare of children* and the definitions of *abuse* as stated in the KCSIE 2024:

#### Definition of Safeguarding

'Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In

order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance (KCSIE 2024) as:

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

*Keeping Children Safe in Education (September 2024)*

### **Definitions of Abuse**

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Abuse can be *physical abuse, emotional abuse, sexual abuse, or, neglect*. These are defined in greater detail below, where signs and symptoms are also set out.

### **Aims**

The aims of this policy are:

1. To raise awareness of individual responsibilities in identifying and reporting possible cases of abuse;
2. To provide a systematic means of monitoring, recording and reporting of concerns and cases;
3. To provide guidance on recognising and dealing with suspected child abuse;
4. To provide a framework for inter-agency communication and effective liaison;
5. To identify strategies and interventions available to support children at risk;
6. To ensure that any deficiencies or weaknesses in Safeguarding arrangements are remedied without delay;
7. To ensure that safe recruitment procedures are operated.

### **Management of Safeguarding**

#### **Designated Safeguarding Lead**

The school has appointed Mr Richard Laslett, Deputy Head Teacher as the Designated Safeguarding Lead. As the Designated Safeguarding Lead, Mr Richard takes lead responsibility for safeguarding and child protection. In the event of his absence from the school, Mrs Emily Reid will act on his behalf.

## Availability and Contact Details

During term time, and throughout the duration of 'Summer School', the Designated Safeguarding Lead and the deputy Designated Safeguarding Lead are always available (during school hours) for staff in the school to discuss any safeguarding concerns. During out of hours activities (for example, on a residential trip) the Designated Safeguarding Lead can be contacted on the out of hours phone number. Contact details for the Designated Safeguarding Lead and the deputy Designated Safeguarding Leads are set out below:

### Contact details for the Designated Safeguarding Lead and Deputy to the Designated Safeguarding Lead

Role	Name	Position at the school	Location on school site	Contact details
Designated Safeguarding Lead including for the EYFS	Richard Laslett	Deputy Head Teacher	School Office, Wemyss Road Building	Internal dial 200 0208 297 1900 or <a href="mailto:dsl@heathhouseprepschool.com">dsl@heathhouseprepschool.com</a> Out of Hours: 07525510510
Deputy to the Designated Safeguarding Lead (DDSL)	Emily Reid	School Development and IT Co-Ordinator	School Office, Wemyss Road Building	Internal dial 200 0208 297 1900 or <a href="mailto:dsl@heathhouseprepschool.com">dsl@heathhouseprepschool.com</a> Out of Hours: 07939506351

### Contact Details of the Local Agency Responsible for Safeguarding

The Lewisham Safeguarding Children Partnership (LSCP) sets the local procedures for what to do where there are concerns about a child. The telephone numbers of the local agencies responsible for Safeguarding are listed in Appendix 1. They must be contacted within 24 hours of a disclosure or suspicion of abuse.

Full local procedures are available from the Lewisham Safeguarding Children Partnership at:

<https://www.safeguardinglewisham.org.uk/lscp>

Tel: 020 8314 3396

Email: [safeguardingpartnership@lewisham.gov.uk](mailto:safeguardingpartnership@lewisham.gov.uk)

If you are concerned that a child has suffered harm, neglect or abuse, this can be discussed with and reported to the Lewisham Multi Agency Safeguarding Hub (MASH). Contact details are in Appendix 1. If a child is at immediate risk of harm, call the police.

### The Role of the Proprietors

As required by KCSIE the proprietors ensure this Safeguarding Policy is implemented and effective. The proprietors of Heath House are Global Schools Group.

They will:

- Be responsible for undertaking annual reviews of the policies and procedures that apply to Safeguarding and of the efficiency with which the related duties have been discharged.
- As owners of the school they have ultimate responsibility of the children in their care and will do their utmost to ensure that all children in their care are safe, happy and learning.

### The Role of the Designated Safeguarding Lead

The role of the Designated Safeguarding Lead as designated safeguarding lead, (guidance taken from KCSIE 2024):

The Designated Safeguarding Lead/safeguarding lead is an appropriate senior member of staff, from the school leadership team. The designated safeguarding lead takes lead responsibility for safeguarding and child protection.

### **Manage referrals**

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children’s social care as required;
- Support staff who make referrals to local authority children’s social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

### **Work with others**

The Designated Safeguarding Lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the headteacher to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.<sup>1</sup>
- As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for safeguarding concerns in cases which concern a staff member.
- Liaise with staff on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- Liaise with the Mental Health Support Team, (this will be Lewisham CAMHS) where safeguarding concerns are linked to mental health.
- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent program etc.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headteacher and relevant teachers, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes:

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<sup>1</sup> <https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

- Ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Work with the IT Co-Ordinator and the Senior Management Team to discuss, determine and implement the appropriate internet Filtering and Monitoring systems for the school to ensure all children's safety when using technology (particularly the internet) at school.

### **Training**

The Designated Safeguarding Lead (and all DDSLs) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments (EHA);
- Have a working knowledge of how local authorities conduct a safeguarding case conference and review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's Safeguarding policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- Have regard for the [Data Protection in Schools](#) guidance;
- Understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners, showing a clear understanding that the DPA/ GDPR does not stop the information passed on to agencies such as the local authority or police;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understand the risks that children face online and have the capability to support them to stay safe. This includes ensuring that the school meets the Internet Filtering and Monitoring guidance set out by the Dfe;

- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

### **Raise Awareness**

The Designated Safeguarding Lead should:

- Ensure the school's Safeguarding Policies are known, understood and used appropriately;
- Ensure the school's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietors regarding this;
- Ensure the Safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

The Designated Safeguarding Lead will:

- Take lead responsibility for safeguarding and child protection;
- Support staff to recognise the needs of children, including rescue from possible abuse or neglect;
- Ensure that staff are familiar with the school's Safeguarding Policy and procedures, the role of the Designated Safeguarding Lead and line of accountability for reporting concerns and making referrals;
- Ensure that appropriate strategies for recording and reporting concerns, disclosures and incidents are kept within school;
- Create a culture of listening to children and taking their feelings and wishes into account, while always putting their welfare at the centre of any decision;
- Where a child's needs are not being met, help children and their families to get the support they need by contacting the Early Help Service (which replaces the Common Assessment Framework) and making an EHA referral;
- Support the Team Around Family (TAF) model and attend any TAF meetings to help practitioners and family members (and where appropriate, the child) share information and create an action plan to support the child's needs;
- Discuss any concerns about a child with their parents or legal guardians, and where possible seek their agreement to make a referral, unless this may either delay or prompt a behavioural response that places the child at increased risk of significant harm;
- Co-ordinate action within the school and liaise with Children's Social Care and other agencies over cases of abuse and suspected abuse;
- Make child protection referrals following the procedures set by the Lewisham Safeguarding Children Partnership (LSCP), recording and reporting accordingly;
- Safeguard children who have suffered or are likely to suffer significant harm by reporting these cases to Children's Social Care immediately;
- Liaise with agencies about individual cases;
- When children leave the school ensure their safeguarding file is transferred to the new school or college as soon as possible within the specified time frame. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained;

- Act as a source of advice within the school;
- Organise training on safeguarding and child protection within school;
- Provide appropriate feedback to members of staff as and when necessary;
- Review and monitor the Internet Filtering and Monitoring systems in place at Heath House;
- Be trained in Safeguarding and inter-agency working. This training will be updated every two years. Training is usually undertaken through Lewisham Council or another suitable and reputable training provider.

### **Role of Staff**

Following guidance in *Keeping Children Safe in Education (2024)* and *Working Together to Safeguard Children (2023)* the school aims to create an environment in which staff feel supported and able to raise concerns about a child or any safeguarding issue to the Designated Safeguarding Lead using the procedure set out below in this policy.

KCSIE states that any member of staff may make a referral to an external agency. Staff should note that if they are worried a child is being abused, or have concerns about the safety or welfare of a child and feel they are not being acted upon by the Designated Safeguarding Lead, it is the staff member's responsibility to take action. If, at any time, staff believe that a child may be a child in need, or that a child is being harmed or is likely to be, they should refer immediately to local authority children's social care. This referral can be made by any member of staff.

All ancillary staff have safeguarding training and are within eye sight or earshot of a member of Heath House staff at all times.

**If a child is in immediate danger or is at risk of harm then a referral should be made to children's social care and/or the police immediately.** The Designated Safeguarding Lead should always be informed. The contact details for Lewisham Children's Social Care services are listed in Appendix 1.

School staff should:

- Be alert to the signs of abuse as detailed in this policy;
- Report any concerns immediately, where possible to the Designated Safeguarding Lead or their deputy and record their concerns on CPOMS;
- Consult with the Designated Safeguarding Lead if in any doubt as to how to proceed;
- Follow the advice given in this policy in relation to how to handle disclosures;
- Follow the Staff Code of Conduct Policy;
- Ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, or engaging in inappropriate electronic communication with a pupil);
- Ensure that assurance is obtained that appropriate Safeguarding checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (for example, in a separate institution);
- Follow the whistleblowing procedures in the Whistleblowing Policy;
- Have regard for KCSIE 2024 and read any updates provided by the school;
- Have regard for the Prevent Duty and read any updates provided by the school;
- Attend all update safeguarding training offered by the school, including twilight courses or any weekend courses staff are enrolled on;

- Engage in informal training during staff meetings and read any briefings or information shared relating to safeguarding children and child protection;
- Ensure that they keep their knowledge up to date by reading e-bulletins and other relevant documents;
- Have regard for all school policies including any updates issued;
- Be aware of any changes in guidance or legislation relevant to their position and the children in their care;
- Ensure they carry out their due diligence prior to directing children to access any website or computer program to ensure that the content is appropriate. If a teacher feels that a website which can be accessed is inappropriate, they should alert the Senior Management Team and IT Co-Ordinator as soon as possible;
- Have due regard to the relevant data protection principles and regulations, but ensure that this does not stand in the way of their duty to safeguard children.

## **Definitions and Signs and Symptoms of Child Abuse**

### **Physical Abuse**

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

Signs and symptoms include:

- Unexplained recurrent/frequent injuries;
- Unexplained or unusual fractures or broken bones;
- Unexplained bruises or cuts; burns or scalds; or bite marks;
- Improbable excuses or refusal to explain injuries;
- Wearing clothes to cover injuries, even in hot weather;
- Refusal to undress for gym;
- Bald patches;
- Chronic running away;
- Fear of medical help or examination;
- Self-destructive tendencies;
- Aggression towards others;
- Fear of physical contact - shrinking back if touched;
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make them study');
- Fear of suspected abuser being contacted.

### **Emotional Abuse**

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious



bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs and symptoms include:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Physical, mental and emotional development lags;
- Sudden speech disorders;
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc');
- Overreaction to mistakes;
- Extreme fear of any new situation;
- Inappropriate response to pain ('I deserve this');
- Neurotic behaviour (rocking, hair twisting, self-mutilation);
- Extremes of passivity or aggression;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child;
- Peer on Peer abuse; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

### **Sexual Abuse**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Signs and symptoms include:

- Being overly affectionate or displaying knowledge/ interest in sexual acts inappropriate to the child's age;
- Using sexual language or having sexual knowledge that you wouldn't expect the child to have;
- Children who ask others to behave sexually or play sexual games;
- Physical sexual abuse problems, including chronic itching, soreness or pain in the genital and anal areas, sexually transmitted infections or underage pregnancy;
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia;
- Personality changes such as becoming insecure or clinging;
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- Sudden loss of appetite or compulsive eating;
- Being isolated or withdrawn;
- Inability to concentrate;

- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or childminder;
- Starting to wet again, day or night/nightmares;
- Become worried about clothing being removed;
- Suddenly drawing sexually explicit pictures;
- Trying to be 'ultra-good' or perfect; overreacting to criticism; and
- Child- on-Child abuse.

### **Neglect**

Neglect the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs and symptoms include:

- Constant hunger;
- Children that are dirty or have poor personal hygiene;
- Constant tiredness;
- Children without adequate clothing, e.g. not having a winter coat;
- Poor state of clothing;
- Emaciation;
- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Failure to receive basic health care;
- Untreated medical problems, i.e. parent fails to seek medical treatment when their child is ill or injured;
- No social relationships;
- Compulsive scavenging;
- Destructive tendencies.

Note: A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone.

Mental health problems can be a sign or indicator of abuse, neglect or exploitation.

All teachers will remain vigilant and report any of the above signs, or a combination of the above signs.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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. Experiencing domestic abuse can have a serious, long lasting

emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

All staff are constantly vigilant for any signs of abuse and report any concerns to the DSL. Additional information and support for staff is available from the NSPCC and the government's advice on ['What to do if you're worried a child is being abused: Advice for Practitioners'](#).

### **Responding to Reports of Sexual Violence**

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance. The DSL will work closely with the LADO in the instance of needing to respond to a report of sexual violence.

KCSIE 2024 states that it is important that all school staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school. When referring to sexual violence in this section, KCSIE does so in the context of child-on-child sexual violence.

When referring to sexual violence, KCSIE refers to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

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

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

## What is consent?

Consent is about having the freedom and capacity to choose.

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

It is important to note that:

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

(KCSIE 2024)

## Specific Safeguarding Issues

### Pupils with SEND

We are committed to protecting all children including pupils with SEND. Additional barriers can exist when recognising abuse, neglect and exploitation, they are particularly vulnerable as they may not be able to communicate or verbalise any issues. These barriers can include:

- behaviour, mood and injuries related to the child's condition which may undergo the exploration/investigation;
- the children may be more prone to peer group isolation or bullying, including prejudice-based bullying, than other children;
- children with SEND, or certain medical conditions, may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

All staff are constantly vigilant for any signs of abuse and report any concerns to the DSL.

### Child-on-Child abuse

KCSIE states the following about child-on-child abuse:

'All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school's or college's policy and procedures with regard to child-on-child 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. All staff 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 child-on-child abuse they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are 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.'

*Keeping Children Safe in Education (September 2024)*

Teachers are vigilant in identifying and responding to cases of child-on-child abuse, whether this is inside or outside of school, or online.

All staff challenge abusive behaviour and any incidents of child-on-child abuse, including abusive comments and interactions must never be passed off as 'banter' or 'having a laugh'.

Children are encouraged to speak to their teachers about any concerns they have and are encouraged to put a note in the 'Talk to the Teacher' box if they would like.

Any incidents of child-on-child abuse are recorded on the teachers 'Behaviour and Bullying Log' which is also reported to the DSL. Further investigations are made as necessary and parents are informed.

Heath House recognises that even if there are no reported cases of child-on-child abuse, it may be present, but not reported.

Heath House recognises that it is more likely that girls will be victim of child-on-child abuse and boys will be perpetrators. It is important to be clear that child-on-child abuse is unacceptable and all allegations will be treated seriously.

Due to the age of children at Heath House, intimate relationships are unlikely, however all staff must be aware that child-on-child abuse may be present in these relationships. In addition, staff will remain vigilant in identifying any child-on-child sexual abuse.

In the context of managing reports of child-on-child sexual violence and/or harassment, KCSIE 2024 states that 'Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent Harmful Sexual Behaviour and may prevent escalation of sexual violence.'

The school has a zero tolerance approach in dealing with the sharing of consensual and non-consensual nude and semi-nude images (also known as sexting).

The school's policy and procedures for incidents of bullying including cyberbullying are set out below.

The school's policy and procedures for dealing with allegations of child-on-child abuse are set out below under the heading Policy on Dealing with Allegations of Abuse made against Members of Staff, Volunteers, Head Teacher or another Pupil.

Please also see the Behaviour Policy for information on the support in place for victims, perpetrators and other children that are affected by incidents of child-on-child abuse.

### **Child Abduction**

At Heath House we take the safety and welfare of the children in our care extremely seriously. As such we have secure safety procedures in place to ensure children are safe whilst within our care, this includes safety from abduction. Staff must be vigilant at all times and report any persons lingering on school property immediately. All doors to the school are locked and unable to be accessed unless staff members allow individuals in. There is a video entry system in place. Visitors and general security are covered in more detail in the Supervision of Visitors Policy.

Children will only be released into the care of a designated adult, see the Arrivals and Departures Policy for more details. Parents are requested to inform the school of any potential custody battles or family concerns as soon as they arise so the school is able to support the child. The school will not take sides in relation to any custody battle and will remain neutral for the child. If an absent parent arrives to collect their child, the school will not restrict access **unless** a court order is in place. Parents are requested to issue the school with a copy of these documents should they be in place. We will consult our solicitors with regards to any concerns over custody and relay any information back to the parties involved.

If a member of staff witnesses an actual or potential abduction from school the following procedure will be followed:

- The police must be called immediately
- The staff member will notify the Head Teacher immediately and she will take control.
- The parent(s) will be contacted.
- All other children will be kept safe and secure and calmed down where necessary.
- The police will be given as many details as possible including details of the child, description of the abductor, car registration number if used, time and direction of travel if seen and any family situations that may impact on this abduction.

In the event of the school being made aware of a local abduction, attempted abduction or other related concern, the children may be shown the following video and have an additional PSHE lesson/ discussion with their teacher to remind them of the appropriate way to behave when out in the local community as well as what to do if they feel they are in danger whilst they are outside.

**Stranger Safety Video:** <https://www.youtube.com/watch?v=H95m0v2sIMY>

### **Upskirting**

Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, is a criminal offence. In line with the schools teaching on cyberbullying and peer-on-peer abuse, any incidents of upskirting will be appropriately reported. Children are not permitted to have a mobile phone with them at school without the permission of their parents and the Head Teacher. Children's phones are switched off and stored in a safe location for the duration of the day.

### **Bullying including Cyberbullying**

The DfE's advice on *Preventing and tackling bullying* states that under the Children Act 1989 a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. The Lewisham threshold for referring concerns about a child being bullied, or bullying other children, is set by the London Safeguarding Children Partnership in the *Threshold Document: Continuum of Help and Support* (see overleaf).

Please see Appendix 4 for the Internet Safety and Filtering Policy.

## Information from the Indicators of Need Matrix [Tier 1-4] in the Threshold Document: Continuum of Help and Support

Tier 1 Children with no additional needs whose health and developmental needs can be met by universal services.	Tier 2 Children with additional needs that can be met through the provision of 'early help assessment' - a referral to children's social care is NOT required.	Tier 3 Children with complex multiple needs who need statutory and specialist services. A referral to children's social care is required.	Tier 4 Children in acute need. Require immediate referral to children's social care and/or the police.
The child's social development			
The child demonstrates accepted behaviour and tolerance towards their peers and others. Where on occasion this is not the case, this is managed through effective parenting and universal services	The child exhibits aggressive, bullying or destructive behaviours which impacts on their peers, family and/or local community. Support is in place to manage this behaviour.	The child exhibits aggressive, bullying or destructive behaviours which impacts on their peers, family and/or local community. Early support has been refused, or been inadequate to manage this behaviour.	The child exhibits aggressive, bullying or destructive behaviours which impacts on their peers, family and/or local community, and which is impacting on their wellbeing or safety.
The child demonstrates feelings of belonging and acceptance	The child is a victim of discrimination or bullying.	The child has experienced persistent or severe bullying which has impacted on his/her daily outcomes.	The child has experienced such persistent or severe bullying that his/her wellbeing is at risk.

Where this is the case, the school will report its concerns to Children's Social Care using the contact details in Appendix 1. Even where safeguarding is not considered to be an issue, the school may need to draw on a range of external services to support the pupil who is experiencing bullying, or to tackle any underlying issue which has contributed to a child engaging in bullying (perpetrator). Please see the Anti-Bullying Policy.

### Other Safeguarding Issues

Children may be at particular risk if:

- They and their family have dealings with the court system;
- They have family members in prison;
- They or their family are/ have been a victim of Modern Slavery (the National Referral Mechanism will be used as necessary);
- They or their family have been involved in Cybercrime;
- They have witnessed ill treatment;
- They or a member of their family has been subject to Domestic Abuse; and
- They or a member of their family has experienced or is experiencing homelessness.

For further guidance on the above, staff are directed to Annex B of the KCSIE 2024 document.

### Children who are lesbian, gay, bisexual or transgender (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships and Health Education (RHE) curriculum and at an age appropriate time in an age appropriate manner to children at Heath House.

The CASS review (as outlined in KCSIE 2024) identified that caution is necessary for children questioning their gender and that families should be encouraged to seek clinical advice. As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to the DfE's [Guidance for Schools and Colleges in relation to Gender Questioning Children](#), when deciding how to proceed.

### **Early Help**

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

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

### **Mental Health and Wellbeing**

Please read the Children's Mental Health and Wellbeing policy for the procedures in place to support children's mental health and wellbeing.



Any member of staff with a mental health concern about a child or another staff member must report this immediately to the DSL so that appropriate action may be taken. Please also see the Staff Mental Health and Wellbeing policy.

### **Children Absent from Education**

KCSIE 2024 places emphasis on the risks associated with children being absent from education. The school has a duty to have regard for KCSIE 2024 and to report children who are. The school's procedures for identifying and responding to children who go missing from education are set out in the Children Absent from Education Policy.

Staff should:

- Be aware that a child going missing from education is a potential indicator of abuse or neglect;
- Understand that unexplainable and/or persistent absences from education' as one sign that children may be at risk of harm;
- Follow the school's procedures for unauthorised absence and for dealing with children that go missing from education as set out in the Children Absent from Education Policy;
- Be aware that children who go missing from education, particularly on repeat occasions, may be at risk of potential safeguarding concerns such as risk of radicalisation, travelling to conflict zones, sexual exploitation, FGM and forced marriage; and
- Understand that taking the attendance register for their class on a twice daily basis is a legal requirement, and an essential part of identifying children who go missing from education.

At Heath House, all pupils are expected to aim for 100% attendance however we do understand that this is not always possible. If a child's attendance percentage falls below 90% over the academic year or if they are absent from school for 5 days or more per term, the child's parents will be contacted by the school, as outlined in the Attendance Policy. All attendance registers are monitored regularly by the Senior Management Team.

### **Children Absent from Education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future (see above). This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker, where being absent from education may increase known safeguarding risks within the family or in the community.

(KCSIE 2024)

### **Child Sexual Exploitation and Child Criminal Exploitation**

From the DfE advice *Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* (February 2017):

The definition of child sexual exploitation is as follows:

'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial

advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

(DfE, February 2017)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or 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. CSE and 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.

(KCSIE, 2024)

### **Child Sexual Exploitation (CSE)**

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 noncontact 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 for example 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 for example they believe they are in a genuine romantic relationship.

(KCSIE, 2024)

Staff should be aware that some of the following signs may be potential indicators of sexual exploitation:

- 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.

### **Child Criminal Exploitation (CCE)**

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.

(KCSIE, 2024)

Staff should be aware that some of the following signs may be potential indicators of criminal exploitation:

- 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.

The LSCB Child Sexual Exploitation Risk Assessment Toolkit for all professionals who work with children and young people is available from: <https://www.safeguardinglewisham.org.uk/lscp/lscp/professionals/toolkits>

### **Female Genital Mutilation (FGM)**

Female genital mutilation (FGM) (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.

FGM is illegal in the UK, and it is mandatory for teachers to report to the police any cases where it appears that FGM has been carried out. Teachers should still report any concerns around a child to the Designated Safeguarding Lead, and involve Children's Social Care as appropriate.

At Heath House, we believe that all our pupils should be kept safe from harm. FGM affects girls particularly from North African countries, including Egypt, Sudan, Somalia, Sierra Leone and Nigeria. Although our school has no/few children from these backgrounds and consider girls in our school safe from FGM, we will continue to review our policy annually.

### **Missing Children**

Children are at risk of harm when they go missing. A missing or lost child from school or from a school trip or outing is a safeguarding issue. The school has specific procedures in place for reducing the risk of a child going missing from school, and for responding to a missing or lost child incident.

Please see the Missing or Lost Child Policy.

### **Preventing Radicalisation – the Prevent Duty and Channel**

Schools are subject to a duty (under section 26 of the Counter-Terrorism and Security Act) and must have due regard to the need to prevent people from becoming terrorists or supporting terrorism. This is known as the Prevent Duty.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

Staff are trained in Prevent and Channel awareness. Should the school identify a child at risk of radicalisation it will contact the Lewisham Prevent Programme (contact details in Appendix 1) to ask for guidance in assessing the level of risk to identify the most appropriate referral, for example, Children's Social Care or Channel.

It is the school's policy that children are supervised at all times when using ICT equipment and the internet, or viewing internet content during lessons. Children are taught about online safety in order to reduce risks and build resilience, including to radicalisation; this is delivered in age appropriate ways as part of PSHE and during Computing/ICT lessons.

Please see Appendix 4 for the Internet Safety and Filtering Policy.

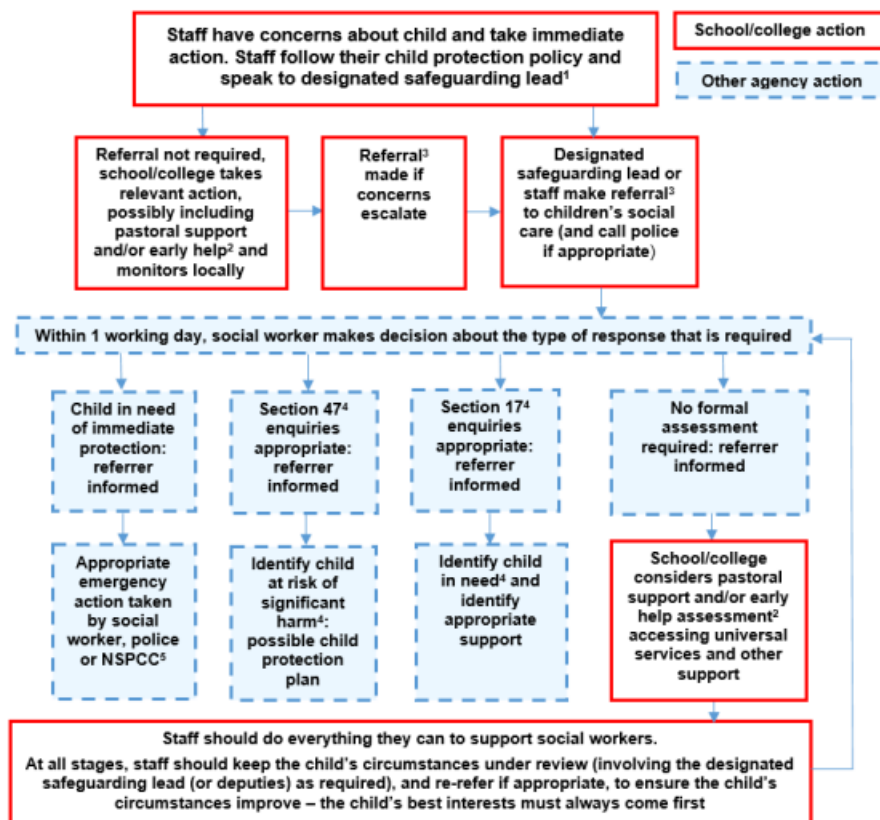
The Borough of Lewisham is a Prevent priority area and contact details for support and advice about extremism can be found in Appendix 1. With regard for Prevent duties and the need to safeguard children from being drawn into terrorism or put at risk of online radicalisation the school will ensure that any visiting speaker is suitably and appropriately supervised, and that children will always be supervised when using ICT equipment and the Internet.

Please see the Supervision of Visitors Policy.

## **Procedures**

The school's procedures for what staff should do if they have concerns about a child are set out below. However, **if a child is in immediate danger or is at risk of harm then a referral should be made to children's social care and/or the police immediately**. Staff should always inform the Designated Safeguarding Lead if they make a referral. The contact details for Lewisham Children's Social Care services are listed in Appendix 1.

### Actions where there are concerns about a child (taken from KCSIE 2024):



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, 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. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

### Contact Details of the Local Agency Responsible for Safeguarding

The Lewisham Safeguarding Children Partnership (LSCP) sets the local procedures for what to do where there are concerns about a child. The telephone numbers of the local agencies responsible for Safeguarding are listed in Appendix 1. They must be contacted within 24 hours of a disclosure or suspicion of abuse.

Full local procedures are available from the Lewisham Safeguarding Children Partnership at:

<https://www.safeguardinglewisham.org.uk/lscp>

Tel: 020 8314 3396

Email: [safeguardingpartnership@lewisham.gov.uk](mailto:safeguardingpartnership@lewisham.gov.uk)

If you are concerned that a child has suffered harm, neglect or abuse, this can be discussed with and reported to the Lewisham Multi Agency Safeguarding Hub (MASH). Contact details are in Appendix 1. If a child is at immediate risk of harm, call the police.

### **Policy on Dealing with Suspected Abuse**

All staff should refer concerns to the Designated Safeguarding Lead without delay. If a child chooses you to disclose:

- Listen to the pupil, keeping calm and offering reassurance;
- Observe bruises but should not ask a child to remove or adjust their clothing to observe them;
- Allow the child to lead the discussion if a disclosure is made, but do not press for details by asking questions, e.g. “what did they do next?”;
- Do not ask a leading question (i.e. one that suggests the answer that is expected);
- Listen — don't investigate or ask leading questions, but use questions such as “is there anything else you'd like to tell me?”;
- Accept what the pupil says without challenge — reassure them that they are doing the right thing and that you recognise how hard it is for them;
- Do not lay blame or criticise either the child or the perpetrator;
- Do not promise confidentiality — explain that they have done the right thing and who needs to be told.

When abuse by another child is suspected, Safeguarding procedures will be applied to both (alleged) abuser and abused. If appropriate, the school's disciplinary procedures will be invoked.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

### **Procedures for Monitoring, Recording and Reporting**

School policy is that accurate notes should be written at the time of the incident or immediately after. Records may be used in legal proceedings and must be accurate and secure. Staff should use the school's CPOMS (Child Protection Online Monitoring System) software, and all records must be copied to the Designated Safeguarding Lead and must include factual information rather than assumption or interpretation. The child's own language should be used, and staff must not attempt to interpret or embellish the child's words. Records may be used at a later date to support a referral to an external agency. Write down what you didn't do as well as what you did do i.e. I did not make my notes immediately because I was with the child and social services until 1am and was then too tired. I made them first thing this morning and all details were still fresh and clear in my mind.

Staff should report any concerns about a child, disclosures or incidents immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will follow the steps and processes set out in *Working*

*Together* and by the Lewisham Safeguarding Children Partnership (LSCP) to assess and provide services for children who may be in need, including those suffering harm. This includes:

- The referral process into local authority children’s social care;
- The process for determining next steps for a child who has been assessed as being ‘in need’;  
The essential processes for children where there is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm (this includes immediate protection for children at serious risk of harm).

### **Thresholds for Referrals**

The Lewisham thresholds for reporting to children’s social care are set by the London Safeguarding Children Partnership in the *Threshold Document: Continuum of Help and Support*; a tool intended to assist practitioners to make decisions about the best course of action, when they have concerns about a child. The Threshold Document contains the Indicators of Need Matrix (Tiers 1 – 4) as well as the Threshold Criteria for child protection referrals under Section 47 of the Children Act 1989. The Threshold Criteria is reproduced in Appendix 2, along with information about where staff may consult a copy of the London Child Protection Procedures and the Threshold Document.

### **Making Referrals to Children’s Social Care or the Police**

**Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children’s social care and if appropriate the police, (see [When to call the police: Guidance for schools and colleges](#) - [npcc.police.uk](http://npcc.police.uk)) is made immediately. Referrals should follow the local referral process.**

The process for making referrals and reporting concerns about a child to Children’s Social Care is as follows:

- The Designated Safeguarding Lead will make a referral to Children’s Social Care;
- Once the referral has been accepted by Children’s Social Care the lead professional role falls to a social worker;
- The Designated Safeguarding Lead will clarify with the social worker the nature of the concerns about the child and how and why they have arisen;
- The Designated Safeguarding Lead will then expect the social worker to make a decision within 1 working day about the type of response required. This includes determining whether:
  - The child requires immediate protection and urgent action is required;
  - The child is in need, and should be assessed under section 17 of the Children Act 1989;
  - There is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm, and whether enquires must be made and the child assessed under section 47 of the Children Act 1989;
  - Any services are required by the child and family and what type of services; and
  - Further specialist assessments are required in order to help the local authority to decide what further action to take.

### **Whistleblowing Procedure**

The school has a culture of supporting staff and encouraging them to share concerns surrounding safeguarding with the Designated Safeguarding Lead. Should a member of staff feel there is unsafe practice, have concerns about another person’s practice or behaviour, or see a potential failure in the school’s safeguarding policy and

procedures, they should contact the Designated Safeguarding Lead or member of the Senior Management Team immediately and follow the school's whistleblowing procedure (see Whistleblowing Policy).

As outlined in KCSIE 2024 and the Whistleblowing Policy, if a member of staff feels unable to raise an issue with the Senior Management Team, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- General guidance can be found via - <https://www.gov.uk/whistleblowing>
- The NSPCC's What you can do to report abuse helpline - <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/> (for staff who feel unable to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled).

Please see the Whistleblowing Policy.

### **Policy on Dealing with Allegations of Abuse made against Members of Staff, Volunteers, Head Teacher or another Pupil**

The school understands that an allegation may be made against a member of staff, volunteer, Head Teacher or pupil. If an allegation is made, the person to whom the allegation is made will immediately inform the Head Teacher and/ or DSL. If the allegation is against the Head, the procedure is to report to the director of Heath House Prep School, Jonathan Carroll - [jonathan.carroll@myglobalschool.org](mailto:jonathan.carroll@myglobalschool.org)

The school will follow the 'Harm Test' before reporting allegations of abuse. A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.

The Local Authority Designated Officer (LADO) must be informed using the procedure described below in respect of all cases in which it is alleged that a person has behaved in a way such that:

- A child has been harmed, or may have been harmed;
- A possible criminal offence against or related to a child has been committed;
- He or she poses a risk of harm towards a child or children if they work regularly or closely with children.

The DSL, in respect of all such cases, will complete a referral form and send this to the LADO within 24 hours of becoming aware. In any case where information is reported to the DSL and a professional judgement made that a child is in immediate danger or risk or harm, the DSL will immediately contact the police, and inform the LADO.

There will be no delay in referring and managing allegations against staff. The matter must remain strictly confidential until the DSL (or LADO) has made an initial assessment. A false allegation, whether it is made for frivolous or malicious reasons, can jeopardise the career of a member of staff/volunteer and cause irreparable damage. Equally, if a genuine complaint is not taken seriously, it can be damaging to the child concerned and to other children who may become future victims.

A member of staff/volunteer against whom an allegation has been made may - but will not automatically - be suspended.

Suspension will arise on the following grounds:



- A child or children would be at risk;
- The allegation is so serious that dismissal for gross misconduct is possible;
- It is necessary to allow any investigation to continue unimpeded.

A distinction should be drawn between an allegation, a concern about the quality of care or practice or a complaint. Please see the school's Whistleblowing Policy and Complaints Procedure.

### **Low Level Concerns**

As part of the whole school approach to safeguarding, Heath House ensures that it promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools to identify inappropriate, problematic or concerning 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 Heath House.

### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant. 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

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

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

**It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately.** Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

All concerns relating to children will be treated with the utmost severity and CPOMS must be appropriately filled in and the procedures contained within this policy must be followed.

Lower level concerns relating to Staff which do not meet the 'Harm Test' outlined above will be addressed separately to higher level of concerns. This is to create and embed a culture of openness, trust and transparency within the school.

All reports of low level concerns are to be reported to the DSL as outlined earlier in this policy. Records of Low Level Concerns are kept securely in the School Office, details of the individual reporting the concern, the date and the nature of the concern are all recorded.

Any patterns of behaviour are noted and appropriate action will be taken including, if necessary, informing the LADO.

Following a report of a low level concern, the Senior Management Team will consider if there are any wider cultural issues in the school that have enabled the behaviour and if all policies and procedures in place are appropriate or need revising. If required, additional training will be provided to minimise the risk of recurrence.

Please see the Staff Disciplinary Policy and the Staff Code of Conduct for the policy on Low Level Concerns relating to staff conduct.

### **Safe Recruitment of Staff**

Mrs Elena Laslett-Shaw, School Manager and Bursar, Mr Richard Laslett, Deputy Head Teacher and Mrs Emily Reid, School Development and IT Co-Ordinator are trained and qualified in Safer Recruitment in Education. The school follows the recruitment procedure set out in the Safe Recruitment of Staff Policy.

Please see the Safe Recruitment of Staff policy.

#### **Staff induction training includes:**

- The Staff Handbook;
- The School Handbook;
- The Safeguarding Policy;
- The identity of the Designated Safeguarding Lead (see Safeguarding Policy);
- Safeguarding Children e-learning;
- The Privacy Policy;
- Introduction to GDPR e-learning;
- The Confidentiality Policy;
- The Staff Code of Conduct Policy;
- The Staff Disciplinary Policy;
- Staff and Volunteer Acceptable Use of Technology Policy Agreement;
- The Whistleblowing Policy;
- The Behaviour Policy;
- The Children Missing Education Policy;
- The School Policy List;
- Information about the risks of radicalisation:
  - The Prevent duty: Departmental advice for schools and childcare providers;
  - How social media is used to encourage travel to Syria and Iraq briefing note for schools;
  - Prevent and Channel General Awareness training (see below);

- Keeping children safe in education: Part 1 information for all school and college staff, and Annex B;
- Duty for health and social care professionals and teachers to report female genital mutilation (FGM) to the police factsheet;
- New staff Handover sheet.

Heath House uses specialist teaching recruitment agencies to fill all staff vacancies such as Reeson and Veritas. The teaching agencies are reputable specialist agencies who have a clear understanding of the type of candidate that may be suited to a particular role at Heath House. The instructed agencies conduct pre employment vetting checks on the school's behalf in addition to the vetting carried out by Heath House.

In line with KCSIE 2024, as part of the recruitment process, the Senior Management Team may carry out an online search as part of their due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. Candidates are made aware of this as part of the application process by the teaching agency and are reminded that such searches may be conducted when they attend the school as part of the interview process.

### **Reporting to the DBS**

The school will report to the Disclosures and Barring Service (DBS), within one month of leaving the school, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. 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 or volunteers;
- Resignation;
- Voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering;
- Referral to the Teaching Regulation Agency where a teacher has been dismissed for "unsuitable professional conduct."

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 Department for Education's register.

Consideration will be given to making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed for misconduct (or would have been dismissed had he/she not resigned first). The reasons for such an order are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Statutory guidance is available to support "consideration", which must be genuine.

Please see the Safe Recruitment of Staff Policy, Supervision of Staff Policy, and Staff Code of Conduct Policy.

### **Use of School Premises for Non-School Activities**

Heath House is the sole occupier of all 3 school buildings (Wemyss Road, Tranquil Hall and the Old Library). The school does not hire the buildings out to any third parties for any non-school events. All activities that take place within the 3 school buildings are school related activities and are therefore subject to all school policies and procedures.

### **Supporting pupils**

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable and secure element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum;
- The school ethos which promotes a positive, supportive and secure environment and gives the pupil a sense of being valued;
- The school Behaviour Policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred;
- Liaison with other agencies that support the pupil such as social services, child and adult mental health services, the education welfare service and educational psychology service;
- Ensuring that, where a pupil on the child protection register leaves, their information is transferred to the new school immediately and that the child's social worker is informed. In line with KCSIE 2024, transfers will be made within 5 days of the child leaving during term time or within 5 days of the start of the new term out of term time.

### **Physical Contact with Pupils**

All staff should be aware of issues related to physical contact with pupils and the way in which this might be misconstrued. This relates particularly to any sensitive areas of the body. In the event of physical restraint it is important that only the minimum amount of physical contact and force is used in order to prevent the pupil from causing injury to themselves, others or property. Following such an intervention an incident form should be completed and the Head Teacher immediately informed. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Please note that staff undergo applicable training in 'Use of Reasonable Force for Independent Schools'.

There are some occasions when physical contact may be appropriate. The need for physical contact for a child in the Early Years Foundation Stage (EYFS) will be greater than for older children, for example, including support with toileting or changing clothes. Physical contact should always comply with the school's Intimate or Personal Care Policy. Physical contact may be necessary to demonstrate a required action or correct a technique, for example in PE or Games lessons, music lessons, and extra-curricular clubs such as Gym & Dance. The appropriate policies have been made available to parents, who have signed the relevant consent form.

Please see the Staff Code of Conduct Policy, Intimate or Personal Care Policy, Extra-Curricular Club Policies and Risk Assessments.

## **EYFS Pupils**

Early years providers have a duty under section 40 of the *Childcare Act 2006* to comply with the safeguarding and welfare requirements of the *Statutory Framework for the early years foundation stage* (EYFS Framework). At Heath House the Early Years Foundation Stage (EYFS) staff complete safeguarding training that enables them to recognise signs of potential abuse, neglect and exploitation. The school designates Mrs Laslett as listed on page 2, to take lead responsibility for safeguarding children within the EYFS setting and liaising with local statutory children's agencies as appropriate.

The school will inform the Independent Schools Inspectorate (ISI) of any allegations of serious harm or abuse by any person living (no permission is given for any person to live on any of the school premises), working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations. The school will inform ISI as soon as is reasonably practical, but at the latest within 14 days.

## **Policy for the use of Mobile Phones and Digital Photography**

Children have their photographs taken to provide evidence of their achievements for development records and displays. Each class has a Tablet which staff use to take photos. Staff, visitors, volunteers and students are not permitted to use their own mobile phones or cameras to take or record images of children for their own records. Please refer to the Tablet Agreement.

All Staff ensure that their mobile phones are off and stored securely during teaching hours. Mobile phones may only be used in an emergency when out of the building, for example when on the Heath.

Please see Staff Code of Conduct Policy and the Staff and Volunteer Acceptable Use of Technology Policy.

## **Online Safety and 'E-safeguarding'**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

KCSIE (2024) states that online safety issues 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual 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 any member of staff feel that pupils, themselves or other staff are at risk, the DSL must be informed and a report filed to the Anti-Phishing Working Group (<https://apwg.org/>).

The proprietors of Heath House ensure that online safety is a running and interrelated theme throughout the school's approach to safeguarding and all related policies and procedures. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

(KCSIE 2024)

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. Staff and volunteers are required to abide by the Staff Acceptable Use of Technology Policy and Tablet Agreement.

The School operates password-protected Wi-Fi across its buildings with adequate firewalls in place. Pupils are not given access to the school Wi-Fi, and only access the Internet via the school laptops during class time and under supervision. It is recognised that with 3G/4G/5G available, staff need to remain alert for the misuse of technology not provided by the school. Pupils are not allowed to bring their own electronic devices to school, this includes mobile telephones. The only exception to this is pupils in Year 6 who may bring a mobile phone to school if they travel to/from school alone, and only with the express permission of the Head Teacher or Deputy Head Teacher. On arrival at school, pupils hand their mobile phones to their form tutor; it is returned to them at the end of the school day. Pupils are not allowed to use their mobile phone during the school day, and may only use their mobile phone under the supervision of a teacher to contact their parents, guardian or carer to confirm their arrival at and departure from school.

It is the school's policy that pupils are supervised at all times when using ICT equipment and the Internet, or viewing Internet content during lessons. Teachers ensure that they have conducted their due diligence before directing children to access a website/ computer program. Teachers inform the SMT and IT Co-Ordinator of any websites/ programs which they feel may have harmful or suspicious content so that the website/ program can be investigated further and access blocked if necessary.

Internet filters are strict and blocked websites and categories are regularly reviewed. The school uses 'Cisco Meraki' content filtering through Virgin Media to control access to websites as well as monitor the use of all devices connected to the school Wi-Fi. The IT Co-Ordinator checks network reports on a daily basis to review the effectiveness of the filters in place and provides feedback to the Senior Management Team as appropriate. Filtered groups and websites are reviewed regularly, as and when the need arises, and as a minimum once per term.

In an age appropriate manner, pupils should be informed of and be able to understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Potential risks of going online include: exposure to and sharing of explicit material (including sexting); grooming; radicalisation; exploitation; identity theft; cyber-bullying; cyber hacking. Pupils are taught about online safety in order to reduce risks, keep themselves safe online, and build resilience, including to radicalisation; this is delivered in age appropriate ways as part of PSHE and during Computing/ICT lessons.

Outside of school hours it is the responsibility of parents, guardians and carers to safeguard their child and protect them from the risks associated with going online, using the Internet, and social media. The school does not allow pupils to access social media sites and applications using the school's laptops or any other devices, and asks for parents to support the school in this by prohibiting their children from accessing social media sites and applications for example, Facebook, Instagram, Tiktok, Pinterest, YouTube, Snapchat, Twitter, Vine and WhatsApp, from home or personal electronic devices. Primary school age children fall below the minimum age restrictions for users of these and similar sites and applications. It is worth considering that such sites will not necessarily have procedures in place to make them suitable places for younger children. If the school receives information that a child is using a social media site or application that they fall below the

minimum age user restriction for, the school will contact the child's parents to request they restrict access to the site. For advice on how to talk to children about online safety see: <https://www.thinkuknow.co.uk>

The school recommends the following 'Parents and Carers resource sheet' produced by Childnet International as a useful source of information and resources about online safety: <http://www.childnet.com/ufiles/parents-factsheet-11-16.pdf> Hard copies of the fact sheet are available from the School Office.

Parents are encouraged to constantly monitor their child's use of the internet when they are at home. Should the school become aware of a child accessing an inappropriate website at home, the child's parents will be informed and will be invited into school to meet with the DSL. The school also arranges for visiting speakers to talk to parents about how to keep their child safe online.

Please see Appendix 4 of this policy for the Internet Safety and Filtering Policy which contains further detail on the measures in place to safeguard children at Heath House.

### **Remote Learning**

In the unlikely event of a school wide closure due to exceptional circumstances, teachers will teach via Microsoft Teams, an online workspace that enables children and teachers to interact in a professional environment as well as share documents, projects, videos and photos of their work. Microsoft Teams can be accessed on a computer, laptop or tablet. All Heath House children will receive their unique login information directly from the school along with information on what to expect from remote learning which will be set out by each class teacher.

Due to the nature of remote learning, the children's use of technology will not be subject to the same strict filters that are in place at school and parents are therefore informed that they must closely, constantly monitor their child's use of technology to ensure that it is appropriate.

The school will intermittently monitor the children's use of Microsoft Teams from a technical perspective however this must not be considered as a replacement for parental monitoring. Teachers are also asked to follow the 'Working from Home Guidelines' that are issued to them by Heath House. Please see the School Closure Arrangements for Child Protection, Appendix 3.

All teachers will be issued with a school laptop to use during any remote learning period, teachers are not permitted to hold any information on children on their own device. Teachers sign a 'Laptop Agreement' on receipt of the laptop and confirm they will follow the correct procedures when using the laptop and working from home. Teachers will only access data relating to the children in their care whilst at school, programmes such as SIMS are not to be accessed from home under any circumstances.

Please see the Laptop Agreement, School Closure Arrangements (Appendix 3) and Working from Home Guidelines.

### **Sexting**

The school follows advice about sexting in schools from the UK Council for Child Internet Safety (UKCCIS): *Sexting in schools and colleges*.

UKCCIS states the following:

'This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under 18s is also illegal. Although the production of such imagery will likely take place outside of school and college, these issues often manifest in schools, colleges and organisations working with children and young people. Schools, colleges and other organisations need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated.'

All incidents involving youth produced sexual imagery should be dealt with as a safeguarding concern and responded to in line with procedures set out within this policy. The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved.

When an incident involving youth produced sexual imagery comes to the attention of a member of staff:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate school staff;
- There should be subsequent interviews with the young people involved (if appropriate);
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm;
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

The school welcomes any questions that staff or parents, carers, or guardians may have about e-safeguarding and online safety. If you would like to speak to the Designated Safeguarding Lead about online safety then please contact the School Office on 020 8297 1900.

For further advice, or to report concerns, contact Child Exploitation & Online Protection (CEOP) using the details in Appendix 1. Links to further advice and information from relevant agencies is also included in Appendix 1.

**If you have any concerns related to the welfare or safety of a child, including online-safety and safeguarding (sometimes known as 'e-safeguarding') please contact the Designated Safeguarding Lead without delay.**

Signed:

**Mark Pearce – Head Teacher**



## Table of changes made in the most recent review

Page number	Change made
Page 2	Definition of safeguarding updated in line with KCSIE 2024
Page 3	Out of hours phone number added for DSL and DDSL
Page 5	Additional duties for the DSL (from KCSIE 2024)
Page 6	Reference to the Data Protection in Schools guidance
Page 14	Early Help and Child-on-Child Sexual violence/ harassment (update from KCSIE 2024)
Page 17	Additional points added for who staff should be particularly alert for, with regards to Early Help.
Page 17	Further guidance on how to support gender questioning children.
Page 18	Further detail added to the Preventing Radicalisation section
Page 18	Detail that unexplained or persistent absences could be a sign of harm
Page 25	Added the importance of calling the local authority or the police. Link to a document which explains when to call the police.
Page 32	Name of Head Teacher amended.
Throughout	References to abuse and neglect have been updated to abuse, neglect and exploitation.
Throughout	References changed to Children Absent from Education (from children missing education)
Throughout	Concern forms replaced with CPOMS

Internal use only

<b>Last reviewed</b>	September 2024
<b>Date for review</b>	September 2025

## **APPENDIX 1**

### **Contact Details - Lewisham Children's Social Care**

First Floor  
1 Laurence House  
Catford Road  
SE6 4RU

Tel: 020 8314 6000

#### **Lewisham Multi Agency Safeguarding Hub (MASH)**

During Office hours: Lewisham's MASH Tel: 020 8314 6660

Out of Office hours: Emergency Duty Team Tel: 020 8314 6000

Email: [mashagency@lewisham.gov.uk](mailto:mashagency@lewisham.gov.uk)

Web: <https://lewisham.gov.uk/myservices/socialcare/children/keeping-children-safe/multi-agency-safeguarding-hub>

### **Lewisham Safeguarding Children Partnership**

Kaleidoscope Child Development Centre  
32 Rushey Green  
SE6 4JF

Web: <https://www.safeguardinglewisham.org.uk/lscp>

Tel: 020 8314 3396

Email: [safeguardingpartnership@lewisham.gov.uk](mailto:safeguardingpartnership@lewisham.gov.uk)

### **Lewisham Local Authority Designated Officer, LADO**

Lewisham Local Authority Designated Officer (LADO) & Child Protection Chairperson  
Quality Assurance Service  
1<sup>st</sup> Floor Laurence House  
1 Catford Road  
London  
SE6 4RU  
Tel: 020 8 314 7280

Email: [LewishamLado@lewisham.gov.uk](mailto:LewishamLado@lewisham.gov.uk)

### **Early Intervention Service (EIS)**

Tel: 020 3228 9300

EHA forms available for download from: <https://www.slam.nhs.uk/our-services/service-finder-details?CODE=SU0393>

**CEOP (Child Exploitation & Online Protection)**

Web: <https://ceop.police.uk/safety-centre/>

**DBS Disclosure and Barring Service**

Tel: 03000 200 190

**Independent School Inspectorate (ISI)**

Email: [concerns@isi.net](mailto:concerns@isi.net)

**Ofsted**

National Business Centre  
Piccadilly Gate  
Manchester  
M1 2WD  
Tel: 0300 123 1231

**Prevent - Support and advice about extremism**

Lewisham Prevent programme

Tel: 07710 387 930

Email: [prevent@lewisham.gov.uk](mailto:prevent@lewisham.gov.uk)

The local police force

Call Lewisham Police using Tel: 101

The non-emergency police number:

Tel: 101

DfE helpline and mailbox for non-emergency advice for staff and governors:

Tel: 020 7340 7264

Email: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

## APPENDIX 2

The London Child Protection Procedures and the Threshold Document: Continuum of Help and Support are available for staff to consult in the School Office.

The London Child Protection Procedures are available from: <http://www.londoncp.co.uk/>

The Threshold Document is available from: [http://www.londoncp.co.uk/files/revise\\_d\\_guidance\\_thresholds.pdf](http://www.londoncp.co.uk/files/revise_d_guidance_thresholds.pdf)

### The Threshold Criteria: Section 47 of the Children Act 1989 (Reproduced from the Threshold Document)

<b>Section 47, Children Act 1989: Child Protection enquiries [Tier 4]</b>
The table below is an indicator guide of the type of circumstances which would lead to a S47 assessment. This table is intended as a guide and is not exhaustive. Reference should also be made to the London Child Protection Procedures 5th edition. <a href="http://www.londoncp.co.uk/procedures/">http://www.londoncp.co.uk/procedures/</a>
Any allegation of abuse or neglect or any suspicious injury in a pre- or non-mobile child.
Allegations or suspicions about a serious injury / sexual abuse to a child.
Two or more minor injuries in pre-mobile or non-verbal babies or young children (including disabled children).
Inconsistent explanations or an admission about a clear non-accidental injury.
Repeated allegations or reasonable suspicions of non-accidental injury.
A child being traumatised injured or neglected as a result of domestic violence.
Repeated allegations involving serious verbal threats and/or emotional abuse.
Allegations / reasonable suspicions of serious neglect.
Medical referral of non-organic failure to thrive in under-fives. .
Direct allegation of sexual abuse made by child or abuser's confession to such abuse.
Any allegation suggesting connections between sexually abused children in different families or more than one abuser.
An individual (adult or child) posing a risk to children.

Any suspicious injury or allegation involving a child subject of a current child protection plan or looked after by a local authority.
No available parent and child vulnerable to significant harm (e.g. an abandoned baby).
Suspicion that child has suffered or is at risk of significant harm due to fabricated or induced illness.
Child/ren subject of parental delusions.
A child at risk of sexual exploitation or trafficking.
Pregnancy in a child aged under 13.
A child at risk of FGM, honour based violence or forced marriage.



## HEATH HOUSE PREPARATORY SCHOOL

### School Closure Arrangements for Safeguarding and Remote Learning

This is an appendix to the Safeguarding Policy and it applies to all children at Heath House, including those in the EYFS. This appendix operates in conjunction with all other school policies and is applicable to the remote learning children may engage in during the closure of Heath House for any unforeseeable reasons (snow days/loss of power or water/pandemic etc)

#### **Safeguarding Arrangements for Remote Learning**

All information and procedures outlined in the Safeguarding Policy still apply during the school closure. In addition to the Safeguarding measures that are outlined in the Policy, it is important to recognise the differences that remote learning and classroom based learning have and the additional safeguarding measures that have been put in place to ensure all children are protected by the school as far as possible.

During a School wide closure, Heath House children will take part in remote learning using Microsoft Teams. Microsoft Teams is an online workspace that enables children and teachers to interact in a professional environment as well as share documents, projects, videos and photos of their work. It can be accessed on a computer, laptop or tablet.

Parents have been informed that by allowing their child to use the login information that they receive from the school, they agree to constantly monitor their child's use of Microsoft Teams and all other aspects of their use of technology in line with the school's policies, ensuring that the use of such technology is appropriate. It is vital that parents work in partnership with teachers to ensure every child accesses technology safely. The School retains the right to intermittently monitor and restrict the use of Microsoft Teams and all Office software that is accessed using the login details provided by the school.

Children are taught how to be safe online whilst at school, and when accessing technology and the internet at school are subject to the school's strict firewalls. Due to the nature of remote learning, it is the parent's responsibility to ensure that their child is using technology safely and that the appropriate restrictions are in place on their computer, laptop and tablet.

Parents are advised to ensure that they have the appropriate internet filters activated to ensure that children access the internet in a safe manner.

When providing content for children to use, teachers will make every effort to thoroughly check that all content is appropriate before publishing it to Microsoft Teams. In addition to this, all teachers will abide by the 'Working from Home Guidelines' that have been issued by Heath House. The 'Working from Home

Guidelines' outline the expectations of teachers to fulfil the stated remote learning timetable as well as guidance on how to ensure lessons are appropriate and effective for all learners.

The school will intermittently monitor children's accounts to check their activity however, this must not be relied upon as monitoring appropriate use as the checks will be carried out randomly from a perspective of confirming the account is functioning correctly. It is the parent's responsibility to ensure that children are using technology safely and appropriately. Staff accounts are regularly monitored.

Teachers and Parents are reminded to be especially vigilant regarding peer on peer abuse through the online Microsoft Teams platform.

Teachers will talk to the children in the same way they would in the classroom. Whilst monitoring each child's mental health and wellbeing is more of a challenge via remote learning, teachers will endeavour to support each child throughout the remote learning period and will liaise with the DSL and/or Head Teacher to address any concerns that may arise.

### **Remote Learning**

All Heath House children, including those in the EYFS, have been issued a unique username and password for Microsoft Office along with a user guide to aid parents in setting up Microsoft Teams on their home computers.

Teachers will create interactive lessons using a multitude of different resources including videos of themselves, videos from YouTube, PowerPoints, Word documents, quizzes and much more. Children are expected to log in each day, at the time outlined by the teacher in the Curriculum Outline sent to parents at the beginning of term, and complete all work that has been set for them to the best of their ability.

As with their normal school timetable, children will engage in academic lessons in the morning and will then be encouraged to exercise and be creative in the afternoon. It is important that children take regular breaks from using their computer, laptop or tablet and move away from the screen during this time.

The work set by teachers will be appropriate for their class and teachers will use a suitable type of technology for the children's age. For example, children in Lower School will receive more video based recordings from their teachers as well as simple quizzes and tasks whereas Upper School children, who have more experience using technology, will be set more complex assignments that may, for instance, require them to type in a Word document. Whilst the children's instruction and many of their tasks will be computer based, teachers will set project and paper based work for the children to engage in to ensure that they are not spending all of their time learning at the computer. Teachers will continue to adapt their teaching style to ensure that it is appropriate for all children in their class.

Children are encouraged to communicate with their teachers about their work and ask questions, just as they would in the classroom at school. Teachers will provide both written (typed) and verbal feedback, via video call, to children for all work that is submitted.

The school will intermittently monitor children’s accounts to check their activity however, this must not be relied upon as monitoring appropriate use as the checks will be carried out randomly from a perspective of confirming the account is functioning correctly. Staff accounts will also be monitored.

Parents who require technical support with Microsoft Teams are directed to contact Mrs Reid on [e.reid@heathhouseprepschool.com](mailto:e.reid@heathhouseprepschool.com)

**If you have any concerns related to the welfare or safety of a child, including online-safety and safeguarding (sometimes known as ‘e-safeguarding’) please contact the Designated Safeguarding Lead without delay.**

Internal use only

<b>Last reviewed</b>	September 2024
<b>Date for review</b>	September 2025



## HEATH HOUSE PREPARATORY SCHOOL

### Internet Safety and Filtering Policy

#### Identifying and Assigning Roles and Responsibilities

Schools should provide a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material. Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It's important that the right people are working together and using their professional expertise to make informed decisions.

The Proprietors have overall strategic responsibility for filtering and monitoring and need assurance from the relevant staff that the standards are being met.

To do this, proprietors should identify and assign:

- A member of the Senior Management Team to be responsible for ensuring these standards are met;
- Roles and responsibilities of staff and third parties, for example, external service providers

These individuals chosen for these roles and responsibilities may do this as part of a wider role within the school. However, it must be clear who is responsible and it must be possible to make prompt changes to the provision.

Mr Richard Laslett has overall responsibility for Internet Safety and Filtering and works closely with the IT Co-Ordinator.

#### Technical Requirements

- Procuring filtering and monitoring systems – Heath House uses Cisco Meraki to filter and monitor the use of the internet. This is procured through Virgin Media. The license for the Cisco Meraki filtering device is renewed annually and at such time discussions are held between the SMT and IT Co-Ordinator as to whether there is a more suitable solution.
- Documenting decisions on what is blocked or allowed and why – All blocked websites and categories are noted on the Meraki website. When changes are made, discussions are held between the SMT and IT Co-Ordinator and noted in the SMT minutes.
- Reviewing the effectiveness of the provision – the effectiveness of the monitoring system is reviewed formally at least once per term with informal reviews conducted frequently.
- Overseeing reports – the IT Co-Ordinator receives a daily report for all internet activity which includes any attempts to access blocked websites or websites which contain content from a blocked category. The IT Co-Ordinator updates the SMT with any instances of suspected misuse or attempted access to a blocked website or category.



## Standards for All Staff

All staff must:

- Understand their role in safeguarding in relation to internet safety and filtering;
- Ensure they are appropriately trained and keep their training up to date;
- Follow policies and procedures in place at Heath House;
- Act on reports and concerns that may arise;
- Ensure that they communicate any concerns in a timely manner;
- Closely monitor the use of any technology by children in their care;
- Be vigilant with any suspicions of inappropriate online relationships including cyber bullying (mainly through observation of conversations or dealing with disclosures appropriately);
- Report if:
  - they witness or suspect unsuitable material has been accessed
  - they can access unsuitable material
  - they are teaching topics which could create unusual activity on the filtering logs
  - there is failure in the software or abuse of the system
  - there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
  - they notice abbreviations or misspellings that allow access to restricted material

The Senior Management Team and IT Co-Ordinator work closely with the School Proprietors on all aspects of Internet Safety and Filtering.

## Day to Day Management

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective.

Any issues which arise are dealt with at the time of the issue – there is **no delay** in acting upon any allegations of inappropriate use or reviewing filters if inappropriate content can be accessed.

As outlined in the Safeguarding Policy, the DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- Filtering and Monitoring Reports (as discussed with the IT Co-Ordinator);
- Safeguarding concerns
- Checks to filtering and monitoring systems

The IT Co-Ordinator is responsible for:

- Maintaining filtering and monitoring systems;
- Providing filtering and monitoring reports;
- Completing actions following concerns or checks to systems.

The IT Co-Ordinator works with the Senior Management Team to:

- Procure systems
- Identify risk
- Carry out reviews
- Carry out checks

The filtering and monitoring systems in place at Heath House are reviewed termly in addition to annually when the solution's license expires at which time investigations into whether the solution remains the most suitable for the needs of the school.

Only the SMT and IT Co-Ordinator have access to the Wi-Fi password.

### **The Importance of Internet Safety, Filtering and Monitoring**

For filtering and monitoring to be effective, it must meet the needs of pupils and staff, and reflect the specific use of technology at Heath House while minimising potential harms. To understand and evaluate the changing needs and potential risks of the school, regular reviews of filtering and monitoring provisions must be conducted, at least annually. The reviews are conducted by the SMT in collaboration with the IT Co-Ordinator using guidance issued by the government to ensure compliance. The reviews are recorded as part of the SMT weekly meetings and Annual Safeguarding Review.

Additional checks to filtering and monitoring need to be informed by the review process so that proprietors have assurance that systems are working effectively and the school is meeting safeguarding obligations.

The annual review takes in to account:

- The risk profile of pupils, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL);
- What the filtering system currently blocks or allows and why;
- Any outside safeguarding influences, such as county lines;
- Any relevant safeguarding reports;
- The digital resilience of pupils;
- Teaching requirements, for example, your RHE and PSHE curriculum;
- The specific use of your chosen technologies, including Bring Your Own Device (currently prohibited at HH);
- What related safeguarding or technology policies you have in place;
- What checks are currently taking place and how resulting actions are handled.

To make the filtering and monitoring provision effective, the review informs:

- Related safeguarding or technology policies and procedures;
- Roles and responsibilities of staff;
- Training of staff;
- Curriculum and learning opportunities;
- Procurement decisions;
- How often and what is checked;
- Monitoring strategies.

The review is formally conducted as a minimum annually, or when:

- a safeguarding risk is identified;
- there is a change in working practice, like remote learning;
- new technology is introduced.

## **Blocking harmful and inappropriate content without unreasonably impacting teaching and learning**

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn. No filtering system can be 100% effective. The SMT and IT Co-Ordinator understand the coverage of the filtering system, any limitations it has, and mitigate risks as much as possible accordingly to minimise harm and meet the statutory requirements in Keeping Children Safe in Education (KCSIE) and the Prevent duty.

An effective filtering system needs to block internet access to harmful sites and inappropriate content however, it should not unreasonably impact teaching and learning or school administration or restrict students from learning how to assess and manage risk themselves.

### **Filtering System**

The school's filtering provider (Cisco Meraki) is:

- a member of Internet Watch Foundation (IWF)
- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- blocking access to illegal content including child sexual abuse material (CSAM)
- Is procured with a broadband service and meets the needs of the school.

The filtering system is operational, up to date and applied to all:

- users, including guest accounts;
- school owned devices;
- devices using the school broadband connection.

Staff are not permitted to 'Bring their own Device' and therefore are not permitted to use the school's internet on their own laptop, tablet, phone or other mobile device.

The filtering system should:

- filter all internet feeds;
- be age and ability appropriate for the users, and be suitable for educational settings;
- handle multilingual web content, images, common misspellings and abbreviations;
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them;
- provide alerts when any web content has been blocked.






















































It is important to be able to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff, such as the SMT or the DSL. All classroom PCs used by teachers are named and are for staff use only, in addition to the tablets for each class which are named. Laptops used by children are for children's use only and are not used by staff without express permission from the SMT/ IT Co-Ordinator. The laptops are also named/ numbered and teachers are aware of which child is using which laptop for traceability.











































## Content Filtering

The current list of categories blocked by are:



































 Block

Content categories

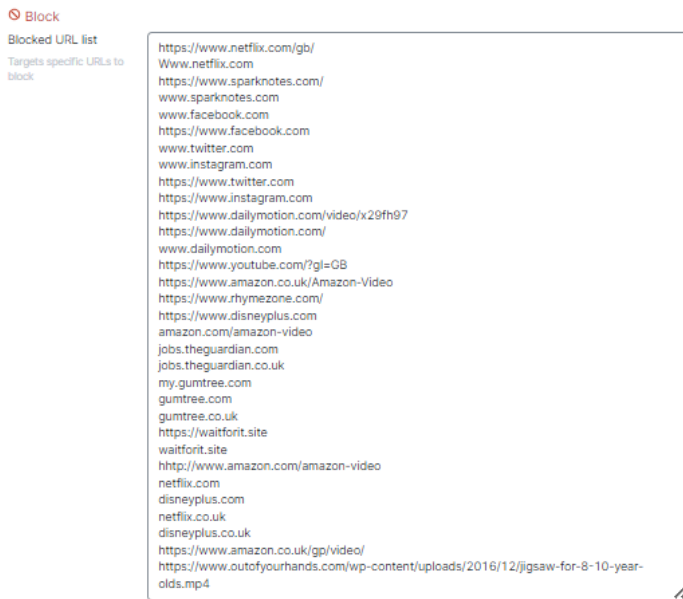
-  Lotteries 
-  Gambling 
-  Cheating and Plagiarism 
-  Humor 
-  Adult 
-  Pornography 
-  Child Abuse Content 
-  Terrorism and Violent Extremism 
-  Illegal Downloads 
-  Illegal Activities 
-  Digital Postcards 
-  Sex Education 
-  Military 
-  Auctions 
-  Tobacco 
-  Alcohol 
-  Non-sexual Nudity 
-  Extreme 
-  Hate Speech 
-  Lingerie and Swimsuits 
-  Sports and Recreation 
-  Hunting 
-  Advertisements 
-  Weapons 
-  Hacking 
-  Cannabis 
-  Job Search 

-  Online Communities 
-  Personal Sites 
-  Dating 
-  Professional Networking 
-  Illegal Drugs 
-  Religion 
-  Astrology 
-  Paranormal 
-  Games 
-  Filter Avoidance 
-  Online Trading 
-  Dining and Drinking 
-  Fashion 
-  Regional Restricted Sites (Germany) 
-  Regional Restricted Sites (Italy) 
-  Regional Restricted Sites (Great Britz) 
-  Regional Restricted Sites (Poland) 
-  Private IP Addresses as Host 
-  Cryptomining 
-  Cryptocurrency 
-  Personal VPN 

Threat categories

-  Spam 
-  Botnets 
-  Spyware and Adware 
-  Phishing 
-  Malware Sites 
-  Exploits 
-  Mobile Threats 
-  High Risk Sites and Locations 
-  Bogon 
-  P2P Malware Node 
-  Ebanking Fraud 
-  Indicators of Compromise (IOC) 
-  Domain Generated Algorithm 
-  TOR exit Nodes 
-  Newly Seen Domains 
-  Cryptojacking 
-  Malicious Sites 

The current list of blocked URLs is:



Youtube searching (for teachers) is currently permitted and there is a 'Strict' filter in place for searches. Children (under the direction of their teacher) are permitted to use Youtube Kids only – this is to be used strictly as a learning resource and children are not free to use the website.

**This policy has been written using information and guidance from the below sources:**

<https://www.ncsc.gov.uk/information/cyber-security-training-schools>

<http://testfiltering.com/>

<https://national.lgfl.net/digisafe/onlinesafetyaudit>

<https://360safe.org.uk/>

<https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring/appropriate-filtering>

<https://swgfl.org.uk/magazine/department-for-education-releases-new-filtering-and-monitoring-standards-for-schools/>

[https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping children safe in education 2024.pdf](https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf)