

SAFEGUARDING (CHILD PROTECTION) POLICY

THE VILLA PRE PREP & NURSERY SCHOOL

The Villa is committed to providing a safe and secure environment for children, staff and visitors and promoting a culture of openness, trust and transparency where children and staff will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children by protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The Villa's Safeguarding policy draws upon duties conferred by the Children Acts 1989 and 2004, The Education and Inspections Act 2006, The Serious Crimes Act (2015), The Children and Families Act 2014, S175 of the 2002 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools), The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools), The Apprenticeship, Skills, Children and Learning Act (2009), The Education and Training (Welfare of Children) Act 2021, The Mental Capacity Act 2005, The Care Act 2014, and the guidance contained in "[Working Together to Safeguard Children](#)", the DfE's statutory guidance "[Keeping children safe in education](#)", Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership (LSCP) and the Southwark Safeguarding Children Partnership (SSCP). We also have regard to the advice contained in DfE's "[What to do if you're worried a child is being abused](#)" and "[Information Sharing – Advice for practitioners](#)". The policy is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of The Villa.

We will ensure that all staff read at least Part one of DfE guidance "[Keeping children safe in education](#)" and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one.

POLICY AIMS

The purpose of this policy is to:

- Identify the names of responsible persons in the school and nursery and explain the purpose of their role
- Outline the role of the Director
- Describe what should be done if anyone in the school and nursery has a concern about the safety and welfare of a child who attends the school and nursery
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school or nursery staff, e.g. volunteers, contractors etc.
- Outline how complaints against staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school and nursery
- Outline how the implementation of this policy will be monitored.

This policy is consistent with all other policies adopted by the Director and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:

- Health & Safety
- Code of Conduct
- First Aid
- Behaviour & Sanctions (Nursery)
- Behaviour Management & Anti-bullying (School)
- E – Safety
- Confidentiality
- Outings & Visits
- Toileting and Nappy Changing

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

Safeguarding and promoting the welfare of children is defined in [*Working Together to Safeguard Children*](#) guidance 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
- taking action to enable all children to have the best outcomes.
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the [*Children's Social Care National Framework*](#).

RESPONSIBILITIES AND IMMEDIATE ACTION

Safeguarding and promoting the welfare of children in our school and nursery is the responsibility of the whole school and nursery community. All adults working at The Villa (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead who is a member of the leadership team.

The Designated Safeguarding Lead are: Tatiana Homer & Louise Maughan
The Deputy Designated Safeguarding Leads is: Kasia Janda

They can be contacted on 020 7703 6216 or emailed:

Tatiana.homer@thevillaschoolandnursery.com

Louise.maughan@thevillaschoolandnursery.com

Kasia.janda@thevillaschoolandnursery.com

The Designated Safeguarding Lead (DSL) who is a senior member of the School takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and process in place) and provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children in need, at risk of significant harm and those who may benefit from Early Help assessments.

DSL is responsible for ensuring that filtering and monitoring systems and process for the school's IT systems are in place and updated in accordance with the latest DfE guidance.

DSL is the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the school's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue. Where there is any doubt as to the seriousness of this concern, or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Deputy Designated Safeguarding Lead (DDSL) or the LA's Strategic Lead Officer for safeguarding in education services. If a child is in immediate danger or is at risk of harm, a referral will be made to Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately (see [when to call the police: guidance for schools and colleges](#)).

DSL will exercise their duty to challenge the actions and decisions of Children Social Care or any other partner agency, in accordance with Southwark Safeguarding Children Partnership (SSCP), local Escalation Procedures (or relevant LSOP's escalation procedures if the child resides in a different LA) where it is believed that an individual professional agency might not be acting in the best interest of the child concerned.

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

THE ROLE OF THE DIRECTOR

The Director will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school and nursery are effective and comply with the law at all times. The Director is expected to receive appropriate training on safeguarding at induction that is updated regularly. In addition, they should receive information (for example, via emails, e-bulletins and newsletters) on safeguarding and child protection at least annually so that they can demonstrate knowledge of their responsibilities relating to the protection of children, young people and vulnerable adults.

The Director will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times. The Director is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at [Human Rights / Equality and Human Rights Commission](#) and [Equality Act 2010: advice for schools](#).

The Director is also aware of duties placed by the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) on organisations and individuals to process personal information fairly and lawfully and to keep the information we hold safe and secure. We note the ICO guidance '[For Organisations](#)' which includes information about our obligations and how to comply, including protecting personal information, and providing access to official information. The Director is aware that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The Director also notes the [DfE Data Protection guidance for schools](#), which will help school staff understand how to comply with data protection law, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

Our Director recognises that whilst all children should be protected, some groups of children, such as children who need a social worker (Child in Need and Child Protection Plans); children who are absent from education; children requiring mental health support; looked after and previously looked after children; care leavers; children with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

Our Director will do all that they reasonably can to limit children's exposure to the risks from the school's IT system. As part of this process, our Director will ensure that the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Our Director will consider the age range of our children, the number of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

In accordance with the DfE's [filtering and monitoring standards](#), the Director have assigned a senior leader Louise Collingwood-Ellis and Tatiana Homer and Amy Wan to ensure that these standards are being met. We will identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.

The Director will ensure that The Villa contributes to inter-agency working in accordance with statutory guidance "[Working Together to Safeguard Children](#)" and that The Villa's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Partnership (SSCP).

The Director has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the head teacher.

Concerns about and allegations of abuse made against the head teacher will be referred to the Director who will liaise with the LA's designated officer (DO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the head teacher.

As good practice, the Director will meet on a regular basis with the DSL to monitor The Villa's safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the school and nursery are meeting its duties in respect of safeguarding.

Types of child abuse and neglect

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, including where they see, hear or experience its effects. 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. They may be abused by an adult or adults or another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

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

Safeguarding incidents and/or behaviours can be associated with factors outside The Villa and/or can occur between children outside school and nursery. All staff, but especially the DSL and DDSLs will be considering the context within which such incidents and/or behaviours occur. This is known as [Contextual Safeguarding](#), which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

In addition to these types of abuse and neglect, members of staff will also be alert to following specific safeguarding issues:

Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on [Mental Health and Behaviour in Schools](#).

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: 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 are regularly absent from school or education or do not take part in education. Any possible CCE case will be

shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; being regularly absent from school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the [London Safeguarding Children Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents where

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) ['Sharing nudes and semi-nudes: advice for education settings working with](#)

[children and young people](#). We also note the DfE's [Searching Screening and Confiscation Advice](#) for schools.

Child on child abuse

Children are capable of abusing their peers. This can take different forms, such as physical abuse (such as bullying, including cyber bullying, hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse (blackmail or extortion, threats and intimidation) sexual violence and sexual harassment; sexting, sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (encouraging other children to engage in inappropriate sexual behaviour, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts). Although it is more likely that girls will be victims and boys perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as “banter”, “just having a laugh” or “part of growing up”.

The Villa has a strong commitment to an anti-bullying policy and will consider all coercive acts and peer on peer abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under The Villa behaviour policies. As a school and nursery, we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. Any possible peer on peer abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Sexual harassment, online sexual abuse and sexual violence

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the school, even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)". All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for

example, girls and LGBT children). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. We will keep comprehensive records of all allegations.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in accordance with '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "[*Keeping children safe in education*](#)" and train our staff members accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

Domestic abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Information

is available about [Domestic abuse and how to get help in Southwark](#). Southwark Council's support and service provider Solace (020 7593 1290, southwark@solacewomensaid.org) offer free and confidential support for women and men aged 16 or over who are survivors of domestic abuse.

So-called 'honour-based' violence (HBV)

HBV includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBV or who has suffered from HBV, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation can affect any child or young person (male or female) under the age of 18 years; can still be exploitation even if the activity appears consensual; can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence; can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [Southwark's VAWG Strategy](#).

Female Genital Mutilation (FGM)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health

problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM.

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "[Mandatory Reporting of Female Genital Mutilation – procedural information](#)".

Preventing Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with

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

- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.
- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141-210.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub ([MASH](#)). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half

blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that Southwark Council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub ([MASH](#)) by emailing MASH@southwark.gov.uk or calling **020 7525 1921**. Advice about whether there is a need to notify the council, can be obtained by contacting MASH. In case of a non-Southwark child, we will notify the relevant LA.

REFERRALS

Where there is a safeguarding concern, we take into account the child's wishes and feelings when determining what action to take and what services to provide. We have systems in place for children to express their views and give feedback. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

We note that Southwark's Multi Agency Safeguarding Hub ([MASH](#)) adopted the London Safeguarding Children Partnership (LSCP) [Threshold Document](#), which provides a framework for professionals who are working with children, young people and families and aims to help identify when a child may need additional support to achieve their full potential. It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support. We also note the LSCP's [The Continuum of Need Matrix](#), which is not an exhaustive list but provides examples that can be used as a tool to assist assessment, planning and decision making for professionals working to safeguard and promote the welfare of children. Safeguarding indicators will always be considered alongside a child's other needs. We will refer to LSCP's Threshold Document and Continuum of Need Matrix when assessing the children's needs and making referrals to Southwark MASH.

Safeguarding referrals should be made to Southwark Multi Agency Safeguarding Hub ([MASH](#)) via [Referral Form](#) and copied to the LA's Schools Safeguarding Coordinator. Prior to any written IARF being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Violence, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the

referral, but a rationale for the decision to progress without consent should be provided with the referral.

Within one working day of a referral being received, local authority children's social care should acknowledge receipt to the referrer and a social work qualified practice supervisor or manager should decide next steps and the type of response required. We will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, we will consider local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

Early Help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention. Our staff will be alert to the potential need for early help for a child who is disabled; has special educational needs (whether or not they have a statutory education; health and care (EHC) plan); is a young carer; is bereaved; is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime; is frequently missing/goes missing from care or from home; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised; is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online; is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; is misusing drugs or alcohol themselves; is suffering from mental ill health; has returned home to their family from care; is a privately fostered child; has a parent or carer in custody; is missing education, or persistently absent from school, or not in receipt of fulltime education; has experienced multiple suspensions and is at risk of, or has been permanently excluded.

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. Southwark's [Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

- General enquiries and signposting
- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested.**

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

All parents applying for places at The Villa will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school and nursery, parents will be notified of this as soon as possible.

The Villa recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or nursery or pupils travelling to and from The Villa and will take all reasonable steps to lessen such risks.

VULNERABLE PUPILS

Particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care. The School's Designated Teacher for Looked-after and Previously Looked-after Children will work with the virtual school head, who manages pupil premium plus for looked after children, to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual school head to promote the educational achievement of previously looked after children. We note the DfE's statutory guidance [*Designated teacher for looked-after and previously looked-after children*](#). Where a child has an allocated social worker, we will liaise with the relevant LA's virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We also note the DfE's non-statutory guidance on [*promoting the education of children with a social worker*](#) that contains further information on the roles and responsibilities of virtual school heads.

Local authorities should share with our school/setting the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or being absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as

bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's [SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#).

If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household, which is affected by family violence, this will be referred to the Designated Safeguarding Lead as a safeguarding issue.

The Villa also acknowledges the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

TRAINING

All staff members will receive appropriate safeguarding and child protection training (including online safety, which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. All newly recruited staff (teaching and non-teaching) and will be apprised of this policy and will be required to attend relevant training. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy on their first day in the setting.

Arrangements are in place for all non-classroom based support staff: including meals, cleaning and other contracted staff to receive relevant induction and ongoing safeguarding training.

The Designated Safeguarding Lead (and their Deputies) will attend an appropriate DSL training course and then refresher training at least every two years. The designated safeguarding lead will also undertake Prevent awareness training and will be able to understand the unique risks associated with online safety. In addition to this formal training, their knowledge and skills will be refreshed (for example, via e-bulletins, meeting other designated safeguarding leads or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. Designated staff will be encouraged to attend appropriate network meetings and to participate in the [multi-agency training programme](#) organised by the Southwark Safeguarding Children Partnership (SSCP).

RECRUITMENT

The Villa is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed and all staff recruited to The Villa will be subject to appropriate identity, qualification and health checks. As part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may

be done as part of due diligence check. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the school, as outlined in Part three of the DfE guidance "[Keeping children safe in education](#)". We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare "[Disqualification under the Childcare Act 2006](#)".

Relevant members of staff who are involved in recruitment will undertake safer recruitment training. The Villa will ensure that at least one person on any appointment panel has undertaken safer recruitment training in accordance with staffing regulations.

This School and Nursery will only use employment agencies which can demonstrate that they positively vet their supply staff. Any alleged misconduct of temporary or agency staff will be reported to the employer concerned and to the LA's Designated Officer (LADO). Staff joining The Villa on a permanent or temporary basis will be given a copy of this policy, the Staff Handbook, The Staff Code of Conduct, and the Allegation against Staff Procedures.

VOLUNTEERS

Any parent or other person/organisation engaged by The Villa to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and Criminal Records Checks.

Under no circumstances a volunteer in respect of whom no checks have been obtained will be left unsupervised or allowed to work in regulated activity.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain DBS certificate for volunteers who are not in regulated activity and who are supervised regularly and on ongoing day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part three of the DfE guidance "[Keeping children safe in education](#)".

Volunteers will be subject to the same code of conduct as paid employees of The Villa.

Voluntary and third sector groups that operate within this school and nursery or provide off-site services for our pupils or use The Villa's facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Safeguarding Children Board. Premises lettings and loans are subject to acceptance of this requirement.

If it comes to our attention that an allegation or complaint of mistreatment has been made against an employee or volunteer of such organisation, this will be reported by the school to the Local Authority's Designated Officer (LADO)

Where services or activities are provided separately by another body we will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with our school on these matter where appropriate. We note the DfE's non-statutory guidance for providers running out-of-school settings.

STAFF CODE OF CONDUCT

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in The Villa's Behaviour Management Policies. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE guidance "[*Use of reasonable force in schools*](#)".

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Care Plan that has been agreed with the parents and health authority.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; for example during musical instrument tuition, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting.

The Villa staff should also be alert to the possible risks that might arise from social contact with pupils outside of the school and nursery. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Head Teacher or Nursery Manager. Visits/telephone calls by pupils to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Head Teacher or Nursery Manager. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Head Teacher or Nursery Manager. Staff supervising off-site activities will be provided with a school mobile phone as a point of contact.

Staff will only use the school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Director. Staff will only use the approved Villa email or other Villa approved communication systems with pupils or parents/carers and only communicate with them on appropriate school and nursery business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.

Staff should be aware of The Villa's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the Head teacher or one of the Designated Safeguarding Leads if the Head teacher is not available and nothing should be said to the colleague involved. It should be shared with the Director if it relates to the Head teacher.

We note the non-statutory [*Guidance for Safer Working Practice for professionals working in education settings*](#) published by the [*Safer Recruitment Consortium*](#).

CONTRACTORS

Building contractors who are engaged by or on behalf of The Villa to undertake works on site will be made aware of this policy and the reasons for this. Long-term contractors who work regularly at The Villa will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Leadership Team deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in non-teaching sessions. All contractors and sub-contractors will be issued with copies of The Villa's code of conduct for staff.

Individuals and organisations that are contracted by The Villa to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity. We will determine the appropriate level of supervision depending on the circumstances.

We will always check the identity of contractors and their staff on arrival at The Villa.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The Villa takes seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. We will ensure that we 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. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including supply teachers, volunteers

and contractors. All such allegations and concerns will be brought immediately to the attention of the Headteacher or one of the Designated Safeguarding Leads if the Headteacher is not available and nothing should be said to the colleague involved. In cases where the Headteacher is the subject of the allegation or concern, they will be reported to the chair of governors, in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – known as ‘low level concerns’.

Allegations that may meet the harms threshold

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school and will be used in respect of all cases in which it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to a school’s attention and appear to meet the above criteria. Contact can also be made with LA’s Schools Safeguarding Coordinator who will liaise with the LADO. Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children’s social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and [London Safeguarding Children Partnership \(LSCP\) procedures](#). This process will agree upon the appropriate course of action and the time-scale for investigations.

The school has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person.

Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services

had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

Concerns and/or allegations that do not meet the harms threshold – known as ‘low level concerns’

The term ‘low-level’ concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be ‘low-level’.**

All ‘low-level’ concerns will be brought immediately to the attention of the Headteacher or one of the Designated Safeguarding Leads if the Headteacher is not available and nothing should be said to the colleague involved. In cases where the Headteacher is the subject of the concern, they will be reported to the chair of governors or chair of the management committee.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance “[Keeping children safe in education](#)”.

The Director is: *Dr I Stoyanov who can be contacted via the main office (0207 703 6216)*

Southwark’s LADO is: Eva Simcock – Tel: 020 7525 0689; Mob: 07943076608; Email: Eva.Simcock@southwark.gov.uk. LADO can also be contacted via Qau.Safeguarding@southwark.gov.uk.

There is also a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with LADO issues when LADO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297

The LA’s Strategic Lead Officer for safeguarding in education services is: the Director of Children’s Services Alasdair Smith 02075250654

The LA’s Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715

Family Early Help Service General Education Enquiries: 020 7525 1922

MASH Duty Desk: 020 7525 1921

We also note the ‘[Safeguarding information for professionals and the community in Southwark](#)’ on Southwark Council’s website.

RECORDS

Detailed and accurate written records will be kept of all incidents and child protection or child in need concerns, discussions and decisions made, and the rationale for those decisions, relating to individual pupils. This will include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent

program etc. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged and these will be kept as CP records. The Villa will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous “secrets”.

Child protection records are not open to pupils or parents. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Leads and their Deputy.

The content of Child Protection Conference or Review reports prepared by The Villa will follow the headings recommended by Children’s Services and will, wherever possible, be shared with the parents/carer in advance of the meeting.

Child Protection records will be sent to receiving schools and nursery settings separately from the main pupil file and under a confidential cover when pupils leave The Villa, ensuring secure transit and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or nursery in advance of a child leaving. For example, information that would allow the new school or nursery to continue supporting victims of abuse and have that support in place for when the child arrives.

When we receive child protection records from other schools or nurseries, we will ensure key staff such as the DSL and SENCO are aware as required.

If a pupil is withdrawn from The Villa having not reached the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify any new address and the school or nursery to which they are being admitted and to ensure that their educational records are sent without delay to the child’s new school or nursery. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service through the Single Point of Contact (SPOC)/ SPOC FEH Team Manager in order for them to make further enquires. If The Villa receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending school or nursery with a note, advising them to refer to their LA’s Children’s Services Department. **A child’s name will only be removed from the School’s Admissions Register in accordance with the DfE guidance Working Together to improve school attendance.**

We will inform the Local Authority when we are about to add or delete a pupil’s name from the school admission register for any reason in accordance with Southwark’s [Children Missing Education \(CME\) Protocol](#).

When a pupil transfers from our school and we do not know to which school they have gone, we will generate CTF for each pupil using XXXXXXX for school number to indicate the destination is unknown, as per paragraph 2.4.2 of the [CTF 24 specification](#). Given that schools cannot search the “lost pupils database”, if a pupil arrives in our school and we do not know the previous school, we will contact the LA’s Education Data Manager Natasha Sharmah (Natasha.Sharmah@southwark.gov.uk, 020 7525 2914), who will be able to search the database for a matching record using gender, names or former names and date of birth and forward it to our school.

The school will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency

contacts. We will hold more than one emergency contact number for each pupil or student to make contact with a responsible adult when a child who is absent from education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

We will take actions according to Southwark's [*Protocol for Children who are Uncollected from School*](#) when pupils who ordinarily do not make their own way home are not collected by their parents/carers at the end of the school day or from after school clubs and activities and when any children with Special Educational Needs who are transported from school can not be dropped-off at their home or meeting point due to the absence of the parent or carer.

SAFETY IN THE SITE

No internal doors to classrooms will be locked whilst pupils are present in these areas.

Entry to The Villa's premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Authorised visitors to The Villa will be logged into and out of the premises and will be asked to wear their identity badges or be issued with visitor badges. Unidentified visitors will be challenged by staff or reported to the Head teacher/Nursery Manager or main office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near The Villa or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if police stops these individuals they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools and nurseries in liaison with the police and through appropriate systems.

Parents, carers or relatives may only take still or video photographic images of pupils at The Villa or on Villa-organised activities with the prior consent of the school and nursery and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

CURRICULUM

The Villa acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship. It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to judge what kinds of physical contact are acceptable and unacceptable;

- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help;
- to use assertiveness techniques to resist unhelpful pressure;
- emotional literacy.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules in accordance with our Online Safety Policy, which, amongst other things, will include appropriate filtering and monitoring on school devices and school networks. We will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Remote education

We understand the importance of keeping pupils, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from our school (if anyone) their child is going to be interacting with online. We also note the DfE guidance [*Safeguarding and remote education*](#).

HEALTHY SCHOOLS AND WELLBEING FIRST: IMPROVING MENTAL HEALTH AND RESILIENCE IN SCHOOLS (IMHARS) PROGRAMME

The Villa will work with partners to promote a whole healthy, inclusive school and nursery approach and achieving the “Healthy School London” status, as well as the local Wellbeing First: Improving Mental Health and Resilience in Schools (IMHARS) Programme award– including a focus on the curriculum as part of the Personal Development (PD)- with the aim of:

- “Closing the gaps” overtime, through using the full capacity and flexibility of the curriculum to help pupils to be safe, confident, healthy, happy and active citizens
- Developing a school and nursery ethos, culture, spiritual, moral, social and cultural (SMSC) development provision and environment which encourages a healthy lifestyle for all pupils, including the vulnerable;
- Using the full capacity and flexibility of the curriculum to help pupils to be safe and healthy;
- Ensuring that food and drink available across the school day reinforce the healthy lifestyle message;
- Providing high quality PSHE including sex and relationship education (SRE) as part of Personal Development
- Providing high quality Physical Education (PE) and sport to promote physical activity and fitness
- Promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing and mental health;
- Working in partnerships with parents/carers, local communities, external agencies and volunteers to support health and wellbeing of all pupils including the vulnerable.

WORKING IN PARTNERSHIP WITH PARENTS

It is our policy to work in partnership with parents or carers to secure the best outcomes for our children. We will therefore communicate as clearly as possible about the aims of this school and nursery.

- We will use clear statements in our brochures and correspondence.
- We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- We will be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary.
- We will distribute the LA's leaflet for parents, "*Protecting Children in Education Settings*".
- We will make available a copy of this policy to any parent who requests it. The policy will also be available through The Villa's web site.
- We will keep parents informed as and when appropriate.

MONITORING AND EVALUATION

The Director will monitor the safeguarding arrangements at The Villa to ensure that these arrangements are having a positive impact on the safety and welfare of children.

This will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school and nursery, backed up by training at every level
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes
- the quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting
- the timeliness of response to any safeguarding concerns that are raised
- the quality of work to support multi-agency plans around the child.

COMPLAINTS

All complaints arising from the operation of this policy will be considered under The Villa's complaint procedure, with reference to the LA's Strategic Lead Officer for safeguarding in education services, as necessary.