



S11 - SAFEGUARDING POLICY AND PROCEDURE

Reviewed: Education and Policy Committee

Approved: Full Governing Body

Approved Date: June 2024

Next Review Date: September 2024

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EXTERNAL SAFEGUARDING CONTACT DETAILS

Local Safeguarding Children Partnership (Kensington and Chelsea / Westminster):

www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/useful-safeguarding-contacts-professionals

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| To report a concern about a child or young person | <p>Westminster Access Team</p> <ul style="list-style-type: none"> • Tel: 020 7641 4000 • Tel Out of hours – 020 7641 6000 • Email: AccesstoChildrensServices@westminster.gov.uk |
| Multi Agency Safeguarding Hub (MASH) | <p>Karen Duncan</p> <ul style="list-style-type: none"> • Tri-borough MASH Business Support Officer • Telephone: 020 7641 3991 • Email: kduncan1@westminster.gov.uk <p>Dhruva Vashee</p> <ul style="list-style-type: none"> • Tri-borough MASH Business Support Officer • Telephone: 07866 077169 • Email: dvashee@westminster.gov.uk <p>Menna Emmanuel</p> <ul style="list-style-type: none"> • Specialist Community Public Health Nurse: • Telephone: 020 7641 5498 • Email: menna.emmanuel@nhs.net <p>Debra Cox</p> <ul style="list-style-type: none"> • Specialist Health Practitioner in MASH: • Telephone: 020 7641 3485 • Email: Debra.Cox@nhs.net |
| For case consultations, advice, guidance from the Safeguarding Teams in Children's Social Care | <p>For case consultations or follow-up enquiries please contact the Duty Child Protection Adviser in the first instance on 020 7641 7668.</p> <p>Gabby Bernard</p> <ul style="list-style-type: none"> • Child Protection Adviser • Telephone: 020 7641 4003 • Email: gbernard@westminster.gov.uk <p>Vanessa Silva Carreira</p> <ul style="list-style-type: none"> • Child Protection Adviser • Telephone: 07971 707 763 • Email: vcarreira@westminster.gov.uk <p>Prabha Vashee</p> <ul style="list-style-type: none"> • Child Protection Advisor • Mobile: 07890 380 253 • Email: pvashee@westminster.gov.uk <p>Sarah Mangold</p> <ul style="list-style-type: none"> • Interim Service Manager for Safeguarding, Bi-Borough • Mobile: 07984 016 841 • Email: sarah.mangold@rbkc.gov.uk |

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| Local Authority Designated Officer (LADO / Management of Allegations) | <p>Please contact duty LADO for consultations and referrals</p> <ul style="list-style-type: none"> • Telephone: 020 7361 2120 • Email: LADO@westminster.gov.uk <p>Aqualma Daniel</p> <ul style="list-style-type: none"> • Safer Organisations Manager & Local Authority Designated Officer • Tel: 07870 481 712 • Email aqualma.daniel@rbkc.gov.uk <p>Sally Smith LADO Manager</p> <ul style="list-style-type: none"> • Royal Borough of Kensington and Chelsea / City of Westminster • Tel: 07967 764 794 • Email: sally.smith@rbkc.gov.uk |
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| Prevent / Channel (Radicalism and Extremism) | <p>Kiran Malik</p> <ul style="list-style-type: none"> • Prevent Programme Manager, Westminster enquiries only • Telephone: 020 7641 5071 • Email: kmalik@westminster.gov.uk or prevent@westminster.gov.uk |
| Education and Attendance | <p>Wendy Anthony</p> <ul style="list-style-type: none"> • Bi-Borough Head of Admissions and Access to Education • Telephone: 020 7745 6440 • Email: wendy.anthony@rbkc.gov.uk |
| Local Safeguarding Children Partnership (LSCP) | <p>LSCP Business Manager: Emma Biskupski</p> <ul style="list-style-type: none"> • Telephone: 07739 315 388 • Email: emma.biskupski@rbkc.gov.uk • https://www.rbkc.gov.uk/lscp |

NSPCC:

Helpline: 0808 800 500 (11am to 3pm, Monday to Friday)

Email: help@nspcc.org.uk (24 hour)

DBS Disclosure Service:

Address: DSB Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF

T: 03000 200 190

E: customerservices@dbs.gov.uk

DfE helpline for non-emergency advice on extremism for staff and governors:

T: 020 7340 7264

E: counter-extremism@education.gsi.gov.uk

Teaching Regulation Agency (Formerly NCTL):

<https://www.gov.uk/government/organisations/teaching-regulation-agency>

T: Contact for reporting possible teacher misconduct: 0207 593 5393

T: General enquiries: 0370 000 2288

E: misconduct.teacher@education.gov.uk

Independent Schools Inspectorate:

Address: Ground Floor, CAP House, 9-12 Long Lane, London, EC1A 9HA

Telephone: 020 7600 0100

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WESTMINSTER ABBEY CHOIR SCHOOL

SAFEGUARDING POLICY DOCUMENT

**This policy is published on the Choir School's website.
It is reviewed annually by the Full Governing Body.**

The school will safeguard and promote the welfare of children who are pupils, or visit, the school so as to keep them safe from harm. This policy is set within the framework of and has regard to

- The Children's Act 1989 and 2004
- [Department for Education \(DfE\) Guidance "Keeping Children Safe in Education" \(KCSIE\) September 2023](#) (including [Disqualification under the Childcare Act 2006](#) (Sept 2018))
- [Working Together to Safeguard Children 2023](#) (WTSC) (December 2023)
- [Information Sharing \(IS\) advice for Safeguarding Practitioners](#) July 2018.
- [London Child Protection Procedures Updated: 30th September 2023](#)
- [National Minimum Standards for Boarding Schools](#) (5 Sept 2022)
- [Education \(Independent School Standards\) \(England\) Regulations 2014](#)
- [What to do if you are worried a child is being abused – Advice to practitioners](#) (DfE) March 2015
- [The Prevent Duty Guidance: for England and Wales - Updated 31 December 2023](#)
- [The Prevent Duty: safeguarding learners vulnerable to radicalisation](#)
- [Mandatory reporting of female genital mutilation: procedural information updated 22 January 2020](#)
- [Relationship Education, Relationships and Sex Education \(RSE\) and Health Education \(2019\)](#) (updated September 2021)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\) 23 March 2022, Updated 24 January 2024](#)

The policy operates in the context of the obligations arising under the Human Rights Act 1998 and the Equality Act 2010.

There are five main elements to our policy, which applies to all staff, governors and volunteers working in the school:

- Ensuring that we practise safer recruitment in checking the suitability of staff and volunteers to work with children.
- Raising awareness of safeguarding issues and equipping children with the skills needed to keep them safe.
- Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse.
- Supporting pupils who have been abused in accordance with their agreed child

protection plan.

- Establishing a safe environment in which children can learn and develop and in which all systems, processes and policies operate with the best interests of the child at heart.

We recognise that, because of their day-to-day contact with children, staff and volunteers are well placed to observe the outward signs of abuse. The school will therefore:

- establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- ensure that children know that there are adults in the school whom they can approach if they are worried
- ensure that all staff members undergo safeguarding training at induction in line with advice from the Local Safeguarding Children Partnership (LSCP). The training will be regularly updated.
- include opportunities in the Personal Social Health and Economic (PSHE) and RSE curricula and elsewhere for children to develop the skills they need to recognise and stay safe from abuse.

We will follow the procedures set out by the bi-borough's LSCP and take account of guidance issued by DfE to:

- ensure that we have a Designated Safeguarding Lead (DSL) and a deputy Designated Safeguarding Lead for safeguarding both of whom have received appropriate training and support for this role
- ensure that we have a named member of staff to oversee the Prevent Duty who has received appropriate training and support for the role
- ensure that we have a Nominated Governor (NG) responsible for safeguarding who has received appropriate training and that all governors receive appropriate safeguarding and child protection training so that they can provide strategic challenge
- ensure that every member of staff (including temporary and supply staff and volunteers) and of the governing body knows the name of the Designated Safeguarding Lead responsible for safeguarding and his/her role
- manage behaviour effectively to ensure a good and safe educational environment and have a clear understanding of the needs of all pupils, including those with mental health needs
- safeguard children from potentially harmful and inappropriate online material via the school's filtering and monitoring systems, and via its online safety policy and acceptable use of the internet policies (boys are not allowed mobile phones or personal internet enabled devices in school) that are regularly reviewed by the Governors
- ensure that all staff and volunteers understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the Designated Safeguarding Lead responsible for safeguarding
- ensure that all staff are prepared to identify children who may benefit from early help. (i.e., providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years)
- ensure that parents have an understanding of the responsibility placed on the

school and staff for safeguarding by setting out the relevant obligations in the parents' handbook

- notify Social Services if there is an unexplained absence of more than two days of a pupil who has a child protection plan (unless the plan requires more immediate notification)
- develop effective links with relevant agencies and cooperate as required with their enquiries regarding safeguarding matters including attendance at case conferences
- keep written records of concerns about children, even where there is no need to refer the matter immediately
- ensure that all records are kept securely, separate from the main pupil file and that safeguarding files are transferred to the new school or college as soon as possible when the pupil moves school
- develop and follow procedures where an allegation is made against a member of staff or volunteer
- ensure that safer recruitment practices are always followed.
- ensure that there are arrangements for reviewing the school's safeguarding policies and procedures, and the efficiency with which the related duties have been discharged
- ensure that any deficiencies in safeguarding arrangements are remedied without delay
- Staff should receive regular and relevant training on safeguarding expectations including those related to their role in the filtering and monitoring of the school network and devices used in school.

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, secure and predictable 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 pupils 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 that he is valued and not to be blamed for any abuse that has occurred
- liaison with other agencies that support the pupil such as social services, child and adult mental health service, education welfare service and educational psychology service
- ensuring that, where a pupil with a safeguarding plan leaves WACS, his information is transferred to the new school immediately and that the child's social worker is informed.

Procedures and arrangements to implement these policy objectives are set out in the Annex: Safeguarding Procedures.

ANNEX: SAFEGUARDING PROCEDURES

The school is committed to acting always in the best interests of the child. We all have a statutory duty to 'safeguard and promote the welfare of children' by:

- protecting children from maltreatment;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Pupils have the right to protection from abuse, neglect or exploitation. Staff must work towards fulfilling the school's vision of providing a nurturing environment where each child is inspired to learn and discover his potential and to feel safe and secure amongst his peers and staff. It is essential that we maintain effective methods and systems to monitor and review the safety and welfare of pupils and staff.

Safeguarding Core Group

Designated Safeguarding Lead (DSL)

Deputy DSL (DDSL)

Nominated Governor (NG)

Chairman of Governors (CoG)

Contact details are given on page 3.

The school will operate its policy in accordance with Westminster City Council's inter-agency procedures. See London Child Protection Procedures (Updated 30 September 2023) a copy of which is available from: <https://www.londoncp.co.uk/>

Responsibilities of the Designated Safeguarding Lead (DSL)

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for safeguarding and child protection remains with the DSL. This responsibility cannot be delegated. During term time the DSL and/or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. They will be responsible for ensuring as far as is possible pupils' safe use of IT with particular reference to on-line safety. The other broad areas of responsibility for the Designated Safeguarding Lead are:

Promoting the welfare of children:

They will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Managing referrals:

They will refer all cases of suspected abuse to the local authority children's social care and the designated officer(s) for safeguarding (all cases which concern a staff member), the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or Police (cases where a crime may have been committed). They will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. They will keep detailed, accurate, secure written records of concerns and referrals.

Training:

Undertaking appropriate training carried out every two years in order to 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. They will need to have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so. In addition to the formal training, as set out above/their knowledge and skills will be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to the role.

They will also ensure that each member of staff has access to and understands the school's safeguarding policy and procedures, especially new and part-time staff and, to the extent necessary, volunteers. They will ensure that staff have suitable training to be alert to the risks of radicalisation and will have sufficient training to be able to provide advice and support for others.

School network monitoring and filtering systems:

The DSL will liaise with the Abbey IT department and choir school IT teacher to ensure the school's network systems are appropriate to the task of protecting pupils. An annual audit will be carried out in line with the guidance set out in:

[Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

The DSL will also carry out a half termly check, in liaison with the Abbey IT department to review the pattern of sites pupils have been accessing and those that have been blocked as well as potential threats from outside the school.

Raising Awareness:

The DSL will ensure the school's policies are known and used appropriately. They will ensure that the school's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, working with governors regarding this. They will ensure that 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 in this. They will link with the local LSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding. Where children leave the school, they will ensure their safeguarding file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained.

In all of the above roles and responsibilities, the DSL and DDSL will, in such a manner as respects the appropriate confidentiality of the children and parents of the Choir School, liaise with Westminster Abbey's Safeguarding Officer to ensure that practices are as aligned across the Abbey as is possible and to benefit from the advice and expertise of that role.

Recruitment of Staff

The school will operate safer recruitment procedures in accordance with guidance in Working Together to Safeguard Children (WTSC 2023) which will include reference to the Independent Safeguarding Authority (ISA), Disclosure and Barring Service (DBS) checks and compliance with Independent School Standards Regulations (ISSR) in order to ensure as far as is possible that staff are suitably qualified to care for children and that we deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities within the school. See the school's policy: [S16 Staff Recruitment and Selection and the associated school guidance S42 Recruitment and Selection Procedures and Guidance](#). Any person whose services are no longer used because they are considered unsuitable to work with children will be reported to the DBS within one month of leaving the school. The school will seek assurance that appropriate safeguarding checks and procedures apply to staff employed by another organisation with whom its pupils are working.

Concerns about a Child

If staff have concerns about a child, they will need to decide what action to take. Where possible, there should be a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care. As Children's social care assessments should consider where children are being harmed in contexts outside the home, it is important that as much information as possible is provided as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#). Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Partnership. In the absence of the DSL, concerns should be referred to the Deputy DSL who has also been appropriately trained in inter-agency safeguarding work.

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, they should be informed as soon as possible that a referral has been made. In borderline cases the DSL will seek guidance from the social services duty and assessment team (contact details given at the end of this annex). They may also consult the document [NPCC - When to call the police](#) and the flow diagram on page 22 of KCSIE 2023. On receiving a referral of a child deemed to be at risk the DSL will contact the Local Safeguarding Children Partnership (LSCP) for the Bi-Borough within 24 hours. This will be confirmed in writing within 48 hours of receiving the referral. (Contact details given at the end of the Annex) see also <https://www.londoncp.co.uk/>

If no response is received within this timescale, confirmation of receipt will be sought.

Early Help

Staff aim to identify children who may benefit from early help through discussions with one of the Designated Safeguarding Leads, with the aim of providing appropriate help and prevent concerns escalating. Staff may be required to support other agencies and professionals in an early help assessment or allowing access for CSC to conduct a section 17 or section 47 assessment if necessary.

Referral processes are also available when there are concerns about children who may be at risk of being drawn into terrorism. See: <https://www.gov.uk/government/publications/prevent-duty-guidance> especially the sector specific guidance for Education in Section 5. Safeguarding is the responsibility of everyone and all staff have a duty to report to the DSL any behaviour that concerns them as showing signs of an inclination to extremism or radicalisation. At WACS, the DSL is also the designated member of staff to oversee the Prevent Duty in school. Where deemed necessary the DSL may discuss matters with children's social care or they may refer the child through the government's Prevent Strategy to Channel. They may also contact the local police force to talk in confidence and get support and advice. Staff will be given training from the DSL in learning to recognise the risks of extremism and radicalisation and managing the risk of radicalisation at WACS specifically in line with Prevent guidance. Similar advice is available from the DSL if staff or parents have any concern that a child may be the subject of sexual exploitation, however apparently innocent, via the internet. See also the school's [S18 Acceptable Use Policy of the Internet and Email](#).

In an all-boys school, it is very unlikely that staff will be alerted to instances of female genital mutilation (FGM) but should staff become aware that a family member under the age of 18 might be a victim they are required by law to make a report to the Police following procedures set out in Section 2.3 of [Mandatory Reporting of FGM: Procedural Information](#).

Definitions of safeguarding and abuse, and the possible signs and forms of abuse are outlined in Annex A of KCSIE 2023.

It is important to differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies. The former will be reported to children's social care immediately; the latter will be referred via inter-agency assessment procedures, most commonly via a Common Assessment Framework (CAF) and Team around the Child (TAC) approaches. Where because of safeguarding or welfare needs a child needs the assistance of a social worker, the school will work with them to ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes; such a need for assistance will inform decisions about safeguarding (for example, responding to unauthorised absence or missing 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).

Through staff training and regular communication, the school seeks an environment where staff feel able to make a referral via the DSL, and are thus supported in their

key safeguarding role. KCSIE (2023) makes it clear, however, that ANY member of staff or indeed any concerned individual may make a referral direct to children's social care and the various contact details are provided at the end of this annex.

Where there is a safeguarding concern, the child's wishes and feelings will be taken into account when determining what action to take and what services to provide, this observing the principle that the best interests of the child will always be paramount.

Responding to Disclosure:

- Ensure the child is safe and, if in distress, cared for.
- Reassure the child that you are taking them seriously, that they will be supported and kept safe, and that you are listening and want to help.
- Never give the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor make them feel ashamed for making a report.
- Let the child talk freely; do not interrupt.
- Keep questions open and to a minimum; do not ask leading questions.
- Never promise confidentiality.

Reporting and Recording Disclosures or concerns:

- Report to the DSL, Deputy DSL or Nominated Governor.
- Record the date and time of the disclosure and put into some context how the child came to say what has happened / is happening.
- Record verbatim what the child said, as soon as possible after the disclosure; keep the record factual and objective. Time and date the report.
- Where there is visible bruising/injury; describe what you have seen and where on the child's body. Do not ask the child to remove clothing. If appropriate a photograph may be a helpful record.
- Describe your observations of the child, describing his emotional state and behaviour.
- Record a clear summary of any concern, follow up action, decisions and any outcomes.
- All information is confidential and once passed on to the DSL there is no right to further knowledge.

Pupils with SEND

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges as 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 disability without further exploration;
 - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
 - children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
 - communication barriers and difficulties in managing or reporting these challenges.
- Given this, reports of abuse involving children with SEND should involve liaison between the SENCO and DSL and consideration of the need for extra pastoral care

Abuse by one or more pupils against another – child-on-child

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- gender based violence/sexual assaults or harassment,
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals.

Staff should be clear as to the school's policy and procedures with regards to child-on-child abuse and they will be trained in how to handle a disclosure of abuse. (See KCSIE 2023 paragraph 156 et seq.). Staff are made aware of types of child-on-child abuse in staff meetings and through electronic communications though the year. We recognise "the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys will be perpetrators' KCSIE) but that all child-on-child abuse is unacceptable and will be taken seriously" – it is equally possible between boys and the absence of reported cases does not mean that such abuse is not taking place, it may simply be that it is not being reported. Abuse is abuse and will not be tolerated or passed off as "banter", "just having a laugh" or "part of growing up": a zero-tolerance approach is taken.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

Any concerns or allegations of child-on-child abuse should be reported to and discussed with the DSL or DDSL. Staff witnessing or receiving an allegation should

not investigate the matter but should make notes and pass these to the DSL who will store them securely and separate from the child's educational file. In the event of an allegation of abuse between pupils the DSL will make an immediate needs and risk assessment, which will be recorded, and will normally seek advice from the Westminster Multi Agency Safeguarding Hub (MASH) before responding formally.

Contact details for the MASH are given at the end of this annex. In most cases the clear guidelines set out in the anti-bullying policy will be followed, but further guidance is given in KCSIE (Part 5) and in the DfE document [sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges](#) (Published 14 December 2017 & Last updated 1 September 2021). The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, such abuse will be referred to local agencies with a view to seeking early help. It is anticipated that in the event of a disclosure of pupil-on-pupil abuse, all children involved, whether perpetrator or victim, will be treated as being "at risk" and will be individually supported, usually with a personal staff mentor. It is understood that, as a boarding school, there is increased responsibility to manage sometimes intense personal relationships between peers. Boarding staff must be especially alert to this and such vigilance will be the most effective procedure for minimizing the risk of child-on-child abuse. Staff should also appreciate that children with special educational needs and /or disabilities may be especially vulnerable to child-on-child abuse. Pupils are not allowed mobile phones in school so the opportunity for sexting within school is limited, but advice is available for staff in dealing with the issue if it is suspected outside school: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DfE Published 23 December 2020)

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language such as using sexism or homophobic language or inappropriate behaviour between peers, including requesting or sending sexual images, and educating pupils about these areas in RSE lessons
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems as set out in our Anti-Bullying Policy (S22) and discussed in PSHE and assemblies
- Ensure staff reassure victims that they are being taken seriously and that they can safely express their views and give feedback

- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation and that LGBT children can be targeted by other children: in these circumstances having a trusted adult and being able to share their concerns is vital
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

Arrangements for dealing with allegations of abuse against teachers, volunteers and other staff

In the event of an allegation made against a member of staff, supply teacher or volunteer, that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in the school the headteacher will follow guidance from Part 4 of KCSIE. This will be the case where the allegation is that they have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

A quick resolution of an allegation is a priority for all concerned. All allegations must be reported straight away to the headteacher. If the headteacher is temporarily unavailable the report should be addressed immediately to the LADO. In addition, if an allegation is made to a member of staff concerning inappropriate behaviour by the headteacher staff must report it immediately to the CoG without notifying the headteacher.

In all other cases the DSL or headteacher will speak to the child/children involved, without in any way investigating the allegation; they will make notes and, if the allegation is not withdrawn, they will report it immediately to the CoG. The school will

not undertake its own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO – now known simply at the ‘Designated Officer’) or in the most serious cases, the police, so as not to jeopardise statutory investigations.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police. In any event, the Designated Officer will be informed within one working day of all allegations that come to the school’s attention or that are made directly to the police.

Once a course of action has been agreed with the Designated Officer discussions will be recorded in writing and communication with both the individual and the parents/carers of the child/children agreed. The school will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Suspension will NOT be an automatic response. If the allegation is against a member of the resident staff, the school will normally provide accommodation away from the pupils while the matter is being dealt with by the Local Safeguarding Children’s Board (LSCB). There are restrictions on the reporting or publishing of allegations against teachers so the school will make every effort to maintain confidentiality and guard against unwanted publicity up until such time as the accused person is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

The school will promptly report to the Disclosure and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used and for whom the DBS referral criteria are met. Even if a referral to DBS is not warranted, the CoG will consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed or would have been dismissed had they not resigned and a prohibition order may be appropriate. Guidance on what would warrant such a referral is available on the TRA website.

In the event of a substantiated allegation against a member of staff, the school will work with the Designated Officer to determine whether there are any improvements to be made to the school’s procedures or practice to help prevent similar events in the future.

Low level concerns about a staff member should also be reported to the Headteacher or if they are unavailable, the DDSL. If there are low-level concerns about the DDSL, this should be reported to the Headteacher. Staff should also self-refer to the DDSL and the Headteacher through submitting an entry on Confide if they have found themselves in a situation which might be misinterpreted, or they have behaved in a way that falls below professional standards. Low level concerns will be reviewed by the Headteacher or DDSL and will include details of the concern, how the concern arose and the actions taken; records will be kept confidentially and enable any patterns that may emerge to be addressed. For further information please refer to the school’s [S11B Low-level Concerns Policy](#).

Training

All staff members will receive appropriate safeguarding training which is regularly updated. In addition to formal re-training sessions, they 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. The DSL and Deputy DSL will undertake relevant training in safeguarding and inter-agency working at least every two years. All staff are given a copy of Part One of KCSIE (together with Annex A) which they are required to read and signify that they have understood. New staff will additionally be given guidance on their responsibilities and a comprehensive talk as to how the school system operates. Details of that training are set out in the Staff Induction Policy (see Appendix 1). Guidance will also be given to all staff to ensure as far as is possible that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil, for example in one-to-one dealings with children.

See also Policy, S34 Staff Interaction with Pupils, S57 Code of Conduct for School Staff. Pupils will also be taught about safeguarding, including online safety, through a broad and balanced curriculum. This may include covering relevant issues through ICT, personal, social, health and economic education (PSHE), tutorials and/or through relationship and sex education (RSE). Boys will be advised what to do if they are worried about something or if they suspect that they or another boy is in any sort of danger. Opportunities will be made in Tutor or Form Circle Time to discuss any concerns boys may have. Senior boys are given a special briefing by the headteacher as to their important role in safeguarding within the school.

Musical Tuition and Performance off Site

Tuition will not normally be given off site, and where it is, parents will be responsible for all aspects on a private basis. It will be made clear that the school can accept no responsibility for making such arrangements unless school staff are engaged. An individual risk assessment will be made for any performances given outside Westminster Abbey and this will include arrangements for safeguarding. In all cases, school or Abbey staff will accompany pupils.

Missing Pupils

In the event of a pupil going missing or being absent from school for a period of time, the school will operate its S38 Missing Pupil Policy which outlines exactly what would happen and who would be contacted at each stage of the process. Any pupil who goes missing or is absent on repeated occasions will be considered to be 'at risk' and the DSL will advise about appropriate support. If a pupil ceases to attend the school, before the child's name is re-classified on the admissions register, the Headteacher will satisfy himself that he has been officially registered at another school. If the headteacher is unable to identify a new school they will contact the local education authority in which the boy's parents live and the Bi-Borough to report the fact before adjustments to the register are made. See also guidance in the government's [Children Missing Education](#).

Reporting

It is the specific responsibility of every member of staff to report to the DSL, or to the Independent Schools Inspectorate (ISI), any concern or allegation about school practices or the behaviour of colleagues or pupils which is likely to put pupils at risk of abuse or other serious harm. Staff should rest assured that there would be neither

retribution nor disciplinary action for such “whistleblowing” in good faith. See also the school’s policy: S52 Whistleblowing Policy.

The member of staff reporting a concern will be asked to give a written account of the alleged incident. This will be kept as a record for possible future reference. It is understood that, should a member of staff simply wish to share a worry, or need simple advice on how best to deal with an incident, it is important to report such concerns however mild they may seem.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them.

The NSPCC Whistleblowing Advice Line is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call the helpline 0808 800 5000 between 11:00am to 3:00pm, Monday to Friday, or email: help@nspcc.org.uk.

Recognising Child Abuse

It is part of a teacher’s responsibility to learn to recognise signs of abuse and to refer any such concerns to the DSL. Staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Staff will be given training to help them to fulfil this role. Appended to this Policy is a document entitled:

APPENDIX 2: When to Worry About a Child – Definitions and Possible Signs of Abuse

Any signs or symptoms of child abuse should be treated with caution. At times there will be straightforward explanations for injuries or behaviour. It is essential that teachers share their concerns with the DSL. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

Confidentiality and Information Sharing

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. However, all confidential issues relating to children and young people should be dealt with on a *need- to- know* basis. Therefore, only specifically relevant information should be passed on to the recipient, who in turn may not pass this information on to another individual, without consulting the informant.

The school will contact the previous school of new boys to ascertain whether there have been safeguarding concerns and the DSL will request copies of any relevant reports. Along with all other Safeguarding reports these will be kept securely and separately from personal files.

All information given by the child is confidential at all times and once a report is made any further action taken will not be disclosed to members of staff. Before a referral to

Social Services is made, an assessment of disclosure will be carried out by the DSL who can seek advice from the lead officer for Safeguarding Schools & Social Care. If a child does not consent to the disclosure of information, then the DSL can override the duty of confidentiality in order to safeguard the welfare of the child. If appropriate, consent can be gained from the parent if this is deemed not to put the child at risk.

Only relevant members of staff in school need to know the details of concerns relating to a child in need i.e., the DSL, Form Teacher or Tutor, Matron and anyone involved in monitoring particular aspects of a child's behaviour. The boy concerned should also know which teachers/staff are in possession of what information, when it will be shared, why and with whom.

Staff and governors will have due regard to the relevant data protection principles, which allow one to process, share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. The Data Protection Act 2018 and 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.

Parents

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with them. However, concerns of this nature must be referred to the DSL, who will decide on the appropriate response. In a very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases, advice will be sought from the Local Safeguarding Children Board (LSCB).

Monitoring a Child

The DSL or, if a Common Assessment Framework (CAF) has been used, the Lead Professional will set a timescale for monitoring a child about whom a concern has been expressed (approximately half a term or 6–8 weeks). If no indicators are found or appear to develop, the monitoring will cease. If indicators and concerns continue, appropriate action will be taken and recorded. As part of good practice, parents/carers will be advised that their child is to be monitored and involved in the process as much

as possible. If a child is on a Child Protection Plan information will be shared with the Social Services.

Any deficiencies or weaknesses identified in the school's safeguarding arrangements will be remedied without delay in consultation with the LADO / Children's Services. The LADO is able to provide advice and they presides over the investigation of any allegation or suspicion of abuse directed against anyone working in the school.

The Governing Body will undertake an annual review of the school's Safeguarding Policy and procedures and of the efficiency with which the related duties have been discharged. This will take the form of an annual report by the DSL and Headteacher to the Governors and scrutiny of the records and procedures by the Nominated Governor.

APPENDIX 1: TRAINING FOR NEW STAFF AND VOLUNTEERS

(Also S45 Training for New Staff on Child Protection / Pupil Welfare)

Welcome to Westminster Abbey Choir School. Every new member of staff is given an induction programme that is tailored to his or her roles and responsibilities. All new teaching staff are allocated a mentor in their first year whose role is to provide informal support and assistance. We hope that your induction programme will help you to settle into the school as quickly as possible, so that you feel that you can make an effective contribution to the life of the school.

One aspect of your induction training involves guidance in handling child protection issues. You will be given a copy of the DfE's guidance document, Part 1 (or Annex A as appropriate) of Keeping Children Safe in Education (KCSIE 2023) which you should read carefully. The following notes (which are reproduced in the Safeguarding Policy) highlight some of the most important principles and procedures.

INTRODUCTION

In any school, safeguarding must always be the top priority. Every member of staff needs to be confident that they understand their role in keeping children safe, promoting the welfare of pupils, promoting equal opportunities and inclusion, and preventing bullying and harassment. Training is therefore crucial in raising awareness of potential safeguarding issues and in giving staff confidence to know how to respond in potentially difficult situations.

Every new member of the teaching and non-teaching staff, including new peripatetic musicians, is given such training. It is normally in the form of a session led by the Designated Safeguarding Lead and every effort will be made to hold such a session within the first week of a new member of staff arriving at the school. Similar training is offered to anyone else whose activities bring them into regular contact with children. All new employees of Harrisons, the firm that runs our catering, are also given training in safeguarding. In addition, staff will be encouraged to take the online training provided by Educare and they will be given regular update training. The only adults who work or visit the school who are exempted from this requirement are:

- Occasional visitors, including occasional lecturers and contractors, who sign in and are given a security badge, who are escorted throughout their visit,
- Registered school inspectors whose credentials have been checked,
- Contractors working on a designated site that is physically separated from pupils, who are required to sign in and out at their site office and to wear security badges at all times,
- Contractors or other visitors working in the school when pupils are not present e.g. during the holidays.

The training involves guidance in handling safeguarding issues. Staff will be given a copy of the DfE's guidance document, Part 1 and Annex A of Keeping Children Safe in Education (KCSIE 2023) which they must read carefully and sign a declaration to that effect. The following notes highlight some of the most important principles and procedures.

DSL

Dr Emma Margrett, is the school's Designated Safeguarding Lead (DSL). She has been trained for the demands of this role and she regularly attends courses with other child support agencies to ensure that she remains conversant with best practice and that our policies and procedures are current and follow that best practice. She receives refresher training at least every two years and she maintains close links with the Local Safeguarding Children Board (LSCB) for the Bi-borough of Kensington & Chelsea and Westminster. She reports at least once a year to the governors on safeguarding issues. The Deputy DSL is Mr Mark Mitchell, and he has been similarly trained. Mr Robert Gullifer is the governor responsible for safeguarding issues (called the Nominated Governor).

TOPICS COVERED IN THE INITIAL TRAINING

1. Our pupil welfare systems

- The Governors' formal consideration of safeguarding issues once a year, with day-to-day issues being delegated to Robert Gullifer, the Liaison or Nominated Governor for Safeguarding
- The roles of the senior leadership team and the DSL and Deputy DSL
- The weekly pastoral meetings, which include all teaching and resident staff
- The regular monitoring arrangements by the form teachers, tutors and matrons
- The role of the Independent Listener
- The training in leadership given to senior pupils
- The role of Circle Time / PSHE / Tutor Periods
- The role of a counsellor (arranged through the GP practice)
- If applicable, we will describe our arrangements for providing additional support for pupils with SEND and for whom English is an additional language.

2. The Framework for our safeguarding and anti-bullying policies

- Part I of Keeping Children Safe in Education (KCSIE) a copy of which is given to all staff
- School Safeguarding Policy
- Acceptable use of the internet and social networking sites (AUP Policy)
- Anti-bullying policy and procedure
- Behaviour policy and procedure
- Policy and procedure for arranging educational visits out of school (if applicable)
- Code of conduct for school staff
- Interaction with pupils – staff guidance
- Adults staying in boarding houses (if applicable)
- Photography
- Restraint
- Whistleblowing
- Missing Children

Attention will be drawn to all the above policies and new staff will be encouraged to familiarize themselves with them. Regularly updated copies are to be found on the

Choir School Drive: Policies & Handbooks

Teaching staff have a particular responsibility for supervising pupils and ensuring that they behave with consideration and good manners at all times but all staff need to be made aware of the school's policies in these areas. Of particular importance is online safety and staff are reminded of their important role in helping pupils in building positive relationships, identifying risks and keeping everyone safe.

3. Handling a disclosure of abuse

We draw on national guidance relating to safeguarding and protecting children; we note some of the signs of abuse, and the duties of staff, as well as the role of specialist agencies. We will explain our expectations of how staff should respond in difficult situations, and why they cannot promise confidentiality to a pupil. (See: S34 Interaction with Pupils Policy)

4. Visitors and Site Security

This covers the need for visitors to be signed in at Reception and to be escorted about the school.

5. Effective Record Keeping

Why effective record keeping matters and where and how records are kept.

6. Refresher Training

The session concludes with reminding staff that refresher training is given usually at yearly intervals along with termly updates and by inviting all staff, governors and volunteers to certify in writing that they have completed and understood the training session.

Please sign and return to the Headteacher:

SAFEGUARDING INDUCTION PROCEDURES in Westminster Abbey Choir School

I _____ have attended an induction session on Safeguarding Procedures. As a result, I have received a copy of KCSIE 2023 (Part 1 & Annex A) and I:

(a) am familiar with the following:

- (i) Anti-bullying Policy (S22)
- (ii) Acceptable use Policy for the Internet and Email (S18)
- (iii) Safeguarding Policy (S11)
- (iv) Behaviour, Discipline and Exclusions Policy (S03)
- (v) School Journey and Educational Visits Policy (S43)
- (vi) Staff Interaction with Pupils – Staff Guidance (S34)
- (vii) Code of Conduct for School Staff (S57)

(b) am aware of procedures for Safeguarding at Westminster Abbey Choir School.

(c) know that Dr Emma Margrett is the Designated Safeguarding Lead (DSL) and that I can discuss any concerns that I may have with them. In their absence or alternatively I can consult the Deputy DSL, Mr Mark Mitchell.

(d) know that further guidance, together with copies of the above policies are available on the Choir School drive.

(e) understand the responsibilities of staff in this area, and I have considered issues that may arise.

Signed _____ Date _____

APPENDIX 2: WHEN TO WORRY ABOUT A CHILD – DEFINITIONS AND POSSIBLE SIGNS OF ABUSE

Definitions

Types of Abuse and Neglect

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

2. **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.

3. **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 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.

4. **Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 32 -35 of KCSIE 2023 & Child-on-child abuse above).

5. **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.

Other Definitions

6. Radicalisation: refers to the process by which a person comes to support terrorism and forms of extremism. Persons may be susceptible to extremist ideology in many different ways and in many different settings. Staff must have regard to the legal duty to prevent children from being drawn into terrorism.

7. Children Missing or Absent from Education: All staff should be aware that children going missing or absent from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of an underlying safeguarding risk and to help prevent the risks of a child going missing in future.

8. Domestic Abuse (DA): 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.

9. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): are forms of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

10. Mental Health: All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff 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 staff 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, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

As a school we encourage and are alert to the benefits of early intervention, mentoring, vertical tutor groups, form time and learning support and where appropriate, the use external specialist support for individual pupils. Staff, in consultation with parents, may also make a referral to Child and Adolescent Mental Health Services (CAMHS).

11. Serious Violence: All staff should be aware of indicators which may signal those children are at risk from or involved with serious violent crime. These may include:

- Increased absence from school
- Change in friendships or relationships with older individuals
- Decline in performance
- Signs of self-harm or change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts.

There is a range of risk factors that increases the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Advice to schools and colleges on gangs and youth violence](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

It's not always obvious when a child is being abused. Types of abuse may overlap with one another. KCSIE highlights the fact that abuse can take place wholly online, or that technology may be used to facilitate offline abuse. There may be specific signs or your instinct may tell you something is wrong. Experts can use these indicators to assess how at risk a child is, no matter how small or seemingly insignificant your concern. Below are some of the more common issues and signs.

Worrying signs in a child's behaviour

Being emotionally withdrawn or aggressive are just two signs that NSPCC Helpline advisors think about when they take a call about a child. They are not a sure-fire way of identifying children who have been badly treated but they may indicate some form of abuse or neglect. Staff should refer to the DfE publication *What to do if you are worried a child is being abused* – Advice for practitioners and the NSPCC website for more information.

Does the child seem 'normal' for their age?

Every child is different. They have their own needs and develop at their own pace. But when you look at them alongside others of a similar age, do they appear to behave as you would expect? If they seem noticeably younger – socially, or in the language they use – or if they seem much older for their age, for example in terms of their sexual behaviour, that may be as a result of an unhealthy relationship with someone.

Do they seem emotionally or socially withdrawn?

Some children are naturally shy. But there's a difference between shyness and being emotionally withdrawn. Children who are emotionally withdrawn have real, chronic trouble expressing how they feel to an adult or to another child. They may refuse to do so, and even go out of their way to avoid talking to or being with others. If a child is emotionally withdrawn, they may be trying to cope with very strong feelings and/or dealing with a powerful distrust of other people.

Are they unusually aggressive?

Is a child often very aggressive, whether physically or in the words they use? They may have been influenced to believe that this is normal behaviour. They may have witnessed violence at home or elsewhere in their life, or feel the need to protect themselves from something.

Are there signs that they may be potential targets for extremism or radicalisation?

There is no one way of identifying an individual who is likely to be susceptible to terrorist ideology. However, many studies show that radicalisation often occurs as young people search for identity, meaning and community. Are there signs of patterns of behaviour that would suggest that a child is engaged, is intent on causing harm or is capable of committing violence.

Worrying signs in a child's physical appearance

Signs of being hurt or dirty are just a couple of concerns that NSPCC Helpline advisors consider when they take a call about a child. They are not a sure-fire way of identifying children who have been badly treated, but they may indicate some form of abuse or neglect.

Does the child seem dirty or smelly?

A child can easily become dirty, when they play sport for example. But if they often seem unclean or smelly for no clear reason, it could be that they are not being given the chance to get clean. Their clothes may not be washed regularly and they may even be denied the chance to have a bath or shower.

Are they bruised or cut in any way?

It's not currently illegal to smack a child but it is against the law to hit them in a way that leaves any lasting mark or **causes injury**. It goes without saying that a parent or carer should never hurt their child in any way, especially if it leaves cuts or bruises on their skin.

Worrying signs in a child's home environment

Is the child left at home by themselves?

There is no law regarding the minimum age that a child can be left home alone – but it is an offence if doing so leaves them in danger. So, there are many things to consider when you notice a child at home by themselves. Assessors will think about their age and maturity, as well as **how long and how often the child is left alone**. For example, a child under the

age of 12 is probably not able to cope by themselves in an emergency. Whilst it might be fine to leave a 16-year-old alone for an evening, it would not be right for them to be left alone for a week.

Are they left out late at night?

It's a normal, healthy part of growing up for a child to play outside with other children and, depending upon their age, with a limited amount of adult supervision. But if left by themselves after what might be considered too long or at a time when they should normally be at home or in bed; they may not be getting the care they need.

Are there unexplained periods of absence from school?

Might the family have had an unexplained trip abroad which could suggest issues of exploitation. Staff should be alert to the possibility of radicalisation, or indeed of a sister being subjected to FGM.

Is their home clean and tidy?

It's natural for busy family homes to be untidy or in need of a clean sometimes. But if it is extremely untidy or often very dirty, a child's health and wellbeing may be at risk. If the family cannot cope with these tasks, then they may not be making sure their child is clean or properly fed.

Worrying signs in a family relationship

Does the child spend time with their family?

If a child rarely spends time with their family, they may be trying to avoid a situation in which they could be hurt in some way. Or a parent or carer may be failing to properly care for their needs.

Do they seem to have a good relationship?

When seen together, does the child appear comfortable with their parents, carers or other family members? Do they seem to get along? If the child seems very uncomfortable or nervous, they may feel afraid of being too close to a family member. If you see a child acting aggressively towards a member of their family, it may be because they feel the need to distance themselves. It's natural for families to argue now and again. But if you see or hear the child being shouted at violently, or being hit, it's important to act to protect them.

General Symptoms

The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused:

- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'

- sexually explicit behaviour (e.g., playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others

These signs are not evidence themselves; but may be a warning, particularly if a child exhibit several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Material taken from NSPCC and KCSIE

APPENDIX 3: GUIDANCE ON DEALING WITH SAFEGUARDING ISSUES AND ADVICE ON STAFF INTERACTION WITH PUPILS

If a Pupil reports Abuse

Pupils who have a problem are encouraged to speak to an adult whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A pupil who is insistent upon confidentiality should be referred to an external source, such as ChildLine (details are given in the booklet S65 Boarding Handbook for Pupils, a copy of which is given to each boy annually). If the pupil is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the DSL with a written account of what has transpired as a matter of urgency.

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).

If a pupil decides to speak to a member of staff about the fact that either he, or a pupil known to him, is being bullied, harassed or abused, the member of staff should:

- React professionally, and remember that in the case of possible abuse (s)he is not carrying out an investigation, (which is a task for specialists),
- Take what the child says seriously and calmly without becoming emotionally involved,
- Make it clear why unconditional confidentiality cannot be offered,
- Explain that any adult member of staff is obliged to inform the DSL, if safeguarding issues are involved, in order that specialist help can be arranged.
- Encourage the pupil to speak directly to the DSL if the matter is sufficiently serious,
- Explain that only those who have a professional “need to know” will be told, and, if appropriate, measures will be set up to protect the pupil from retaliation and further abuse,
- Reassure the child that he was right to tell, and that he is not to blame for having been bullied or abused,
- Allow the child to tell his own story, without asking detailed or leading questions.
- If the matter concerns child-on-child bullying, explain how the school anti-bullying policy works and what the next steps will be,
- Record what has been said as soon as is possible including the time and date at which the record was made. Sign and date a print-out of the record.
- If the matter constitutes a serious safeguarding incident, inform the DSL as soon as possible - at least by the end of the morning/afternoon session of that day. If the DSL is unavailable, inform the deputy DSL.
- Inform the Headteacher immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the school, or on a school trip. (If the headteacher is unavailable – or is involved - the Chairman of Governors should be told immediately rather than referring to the deputy DSL).

Where there are evident signs of physical injury that may (or may not) be the result of abuse or bullying, medical help should be summoned. In serious cases, the Police

should be informed from the outset. For detailed guidance see the full Safeguarding Policy above.

Role of School Medical Staff

Health professionals operate within their own professional guidelines, which include an obligation to refer cases of abuse to the DSL.

Whistleblowing

If a teacher or member of staff has concerns about the behaviour of another member of staff (including supply staff and volunteers) towards a pupil, he or they must report it at once to the Headteacher. Any concern will be investigated. If there is evidence of criminal activity, the Police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution. A member of staff who uses the whistle-blowing procedure is entitled to have their name protected from being disclosed by the headteacher to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that their evidence may be required by the Police to be used in any criminal proceedings. See also the policy: S52 Whistleblowing Policy. If as a result of any investigation into safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children, a person in regulated activity is dismissed or removed, or would have been had they not resigned, a referral to the Disclosure and Barring Service (DBS) will be made.

Promoting Awareness of Safeguarding and Wellbeing

Our curriculum and pastoral systems, enhanced by the form and tutor systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that pupils relate well to one another and feel safe and comfortable within the school. We expect all teaching and medical staff to lead by example, and to play a full part in promoting an awareness (that is appropriate to their age) amongst the pupils on issues relating to health, safety and well-being. All staff, including non-teaching staff, have an important role in insisting that pupils adhere to the standards of behaviour set out in the behaviour policy and in enforcing our anti-bullying policy. Resident house staff have a particularly important role to play.

Time is allocated in PSHE classes, in tutor groups and in Form time for discussions as to what constitutes appropriate behaviour and why bullying and lack of respect for others is never right. Assemblies, drama and RS lessons are used to promote tolerance and mutual respect and understanding. The ICT curriculum teaches boys about the unacceptability of cyber bullying and abusive behaviour and to promote the safe use of the internet and mobile phones, inside and outside school.

Role of Senior Pupils

All boys in Form V are given basic leadership training as part of the PSHE programme that includes making sure that the younger pupils are kept safe, and guidance on the appropriate action that they should take if they discover that a pupil is being bullied or abused.

SPECIFIC GUIDANCE FOR STAFF ON INTERACTION WITH PUPILS

While it is vital that staff develop positive relationships with the pupils in their care, they need to ensure that their behaviour does not inadvertently lay them open to allegations of unprofessionalism or even abuse. They need to be seen to treat all pupils professionally and with respect.

Physical Proximity

It is sensible to try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental or singing lesson/rehearsal or in a personal tutorial etc, it is good practice to ensure that others are within earshot, that the room in which they are meeting is not so private that no one else is likely to use it and it should have windows that allow others to see in. Where possible, a gap should be maintained between teacher and child at all times.

Pupils should not be picked up (unless medically necessary or being restrained), nor should they be allowed to sit on a member of staff's lap. They should be gently discouraged from hugging school staff, though matrons may consider that there are occasions when such comfort is appropriate and professionally sound. Any physical contact should be the minimum required for care, instruction or restraint. This is also relevant in singing lessons, Alexander Technique lessons or other instrumental lessons when a degree of physical contact may be necessary. The teacher should always ensure that the child feels comfortable with the physical contact. For example, they should say something like, "Do you mind if I touch you here....?" The teacher must ensure that such contact does not ever breach professional boundaries.

Staff should avoid taking one pupil on their own in a car. An obvious exception to this would be an emergency visit to hospital, for example, but even in these circumstances staff should be healthily wary of putting themselves in a situation that could be misinterpreted. Ideally, a staff member should place the pupil in the back of the car rather than on the passenger seat.

In a small and personal school such as this it is very easy for staff and boys to get to know one another very well indeed. That is just as it should be, but staff must always keep a professional distance. They should avoid any suggestion of showing favouritism and they must maintain the demeanour of a responsible adult professional rather than that of an equal or friend.

Staff accommodation is strictly out of bounds to pupils and no member of staff should share sleeping accommodation with pupils or invite them to their home. The ground floor of the Headteacher's House is used as an area for pupils to rehearse ensembles. There are clear signs and a stairgate designating that access beyond the ground floor is not permitted.

See also Policies: S49 Adults Staying in Boarding Houses and S57 Code of Conduct for School Staff.

Communication with Pupils

Staff should not give their personal mobile phone numbers to pupils, nor should they communicate with them by text message, social networking site or personal email. For their own safety, they should maintain this professional distance even after a pupil has left the school, while he is still of school age. Staff may of course use the school email system to communicate with pupils for matters relating to school. The Group Leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her. Except in cases of emergency, a school mobile phone should be used for any contact with pupils that may be necessary. If pupils' personal mobile phones have been used, the Group Leader will delete any record of their numbers at the end of the trip or visit.

Physical Restraint

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself or on another, and then only as a last resort, when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the headteacher. See also S41 Restraint Policy.

Photography

Parents have given consent to their child's photograph being used in external news or publicity material for the Choir School or the Abbey. It is the school's policy not to use a photograph and a name together, except in those publications distributed internally and to parents. In special circumstances where it is appropriate to provide a photograph and identify a particular pupil by name externally, the school will first seek consent from parents.

It is permissible for staff to take photographs of pupils engaged in *bona fide* school activities for the purposes of record keeping and for display around the school. Staff are not permitted to store images of pupils on personal computers, phones, cameras or other electronic devices. Any photographs of school pupils taken on such personal recording equipment must be either deleted or transferred permanently as soon as possible to the school's network. The use of cameras on mobile phones is not allowed in washing and changing areas, or in the dormitories, nor should photography be used in a manner that may offend or cause upset. The misuse of cameras in a way that breaches our anti-bullying policy is always taken seriously and may be the subject of disciplinary procedures. The school expressly prohibits the use of images of the school or its pupils on any external website (other than the school's or Abbey's own websites or channels) such as personal accounts on YouTube, Twitter, Facebook, Flickr etc. Staff are however able to 'like' content on official channels from their personal accounts should they wish to do so, but should never communicate with pupils either publicly or privately on these accounts. See also S48 Use and Storage of Images of Children Policy.

APPENDIX 4: ONLINE-LEARNING ADDENDUM

There may be times during the academic year when the school, a class or individual boys may have a period of working at home being taught online. This appendix offers guidance in such circumstances.

This addendum to the Safeguarding Policy is to be read in conjunction with the following Policies whose provisions inform and govern the school's online learning activities and provision:

S18: Acceptable Use Policy for the Internet and Email

S22: Anti-Bullying Policy

S23: Bullying for all Pupils

S48: Use and Storage of Images

S69: Online Safety Policy

Reporting Concerns

All staff must continue to act on any concerns they have about a child immediately. It is still vitally important to do this, both for children still attending school and those at home.

The DSL will continue to be available to anyone who has a concern about safeguarding as per the details on page 3. If they are unavailable, the Deputy DSL may be contacted. One of the DSL and Deputy DSL will be contactable at all times that online teaching is taking place.

If a pupil feels that they have been subject to online bullying or child-on-child abuse they should follow the procedures set out in the school's policies on Bullying (S22 & S23).

Attendance

A daily register will still be taken each morning and staff will keep records of boys' attendance at timetabled lessons, informing the school office if a boy does not attend an online session. The school will liaise closely with parents in relation to attendance and ask for their cooperation by ensuring that any illness preventing online attendance is communicated to the school.

Teaching and Learning

Teaching will only be conducted by employees of Westminster Abbey who are in possession of a DBS certificate in accordance with the provisions of the wider safeguarding policy.

Teaching will be carried out both online and independently in pupils' homes. Where online provision is made, this will be carried out on Microsoft Teams only unless the situation has been notified to and approved by the Headteacher and DSL.

Ratios & Contact

With the exception of music & speech lessons, teaching will not ordinarily be carried out on a one-to-one basis. In guided academic lessons some short 1:1 assistance may be given on occasion. All lessons will be initiated by a member of Abbey staff via MS Teams and never by a pupil.

Recording of Lessons

With the consent of parents, not unreasonably to be withheld, WACS employees may record lessons conducted on a one-to-one basis for the purposes of monitoring and safeguarding. These will not as a matter of course be shared with pupils or their parents but retained for the purpose of ensuring pupils' safety. These files will be held on the MS Teams systems on the Abbey's servers. All staff will be contacted to give their consent to this element of the policy so as to comply with the personal data provisions of GDPR. Files stored on the Abbey's servers will be deleted at the end of the term following that during which they were created.

Remote Teaching Lead

The Headteacher will be responsible for the timetabling and supervision of online teaching and will communicate relevant appointments to teachers and pupils. The headteacher will be able to log in to any teaching session being conducted on MS Teams whether on an ad hoc basis or in response to any concern that may be raised.

E-mail Communication between Staff and Pupils & Generally

E-mail communication between staff and pupils will only be permitted via the Abbey e-mail addresses of the staff and the Abbey e-mail addresses of pupils. These will either end with @westminster-abbey.org or school.westminster-abbey.org. Communication between parents and staff will be between Abbey e-mail addresses and those already held or subsequently notified to and verified by WACS. E-mail communication can and will be monitored by authorised members of the IT department and WACS Safeguarding Officers to keep oversight of content and participation in teaching and learning. All e-mails are filtered by the Abbey's Mimecast filtering system. Boys are only able to send e-mails to Abbey e-mail addresses and those added to a Safe Senders list (parents & guardians and such other parties as are approved by WACS).

Where?

If the member of staff is teaching from home they are to teach from a study or other daytime room. Pupils attending a Teams session must be in a public part of their home and only in exceptional circumstances be in their bedroom, this will have been agreed by the Headteacher.

How – online behaviour?

Staff teaching on Teams must be dressed professionally as they would ordinarily be in WACS. Pupils are to be dressed smartly but casually. Pupils and staff are to observe the same standards of behaviour and professionalism as if they were teaching within the precincts of Westminster Abbey and as set out in the school's other policies. Specifically, the School will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of child-on-child abuse. Staff will continue to act on any concerns they have immediately – about both children attending any school setting and those continuing their education at home.

Mental Health

The school will continue to offer emotional support to the boys although this will be less easy than usual. The School's Independent Listener, Mrs Streeting, whose

details are posted around school and will be forwarded to parents separately from this document.

When setting expectations for pupils learning remotely and not attending school, staff will bear in mind both children's and adults' mental health and regularly review the provision being made and how the children are adjusting to it.

Particularly, staff will be alert to signs of boys' mental health being affected by online learning by looking for indicators such as:

- Boys not completing assigned work or logging on to school systems
- There being no contact from children or families
- Boys seeming more withdrawn during any class check-ins or video calls

Online Safety

It is perhaps more important than ever that parents are aware of the potential risks to children online and the importance of staying safe online. The school will keep children informed about what their timetable is and which parts of it are to be conducted online, including what sites they will be using and who they will be interacting with from the school.

Should parents need additional support to keep their children safe online, please contact the Headteacher. A good site in relation to online safety is

<https://www.internetmatters.org/parental-controls/>