

SAFEGUARDING AND CHILD PROTECTION POLICY

This policy applies to the whole school including the Early Years Foundation Stage (EYFS) is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

Document Details

Information Sharing Category	Public Domain
Version	V4
Date Published	September 2025
Authorised by (if required)	Proprietor
Review/Update Date	September 2026
Responsible Area	Safeguarding Team

Safeguarding is the golden thread that runs throughout every aspect of the school. Our School understands that good safeguarding requires a continuing commitment from governing bodies, proprietor, and all staff to ensure the safety and welfare of children is embedded in all the school's processes and procedures and consequentially enshrined in our ethos.

All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. All employees and volunteers are required to sign that they have read, understood and will abide by our '*Safeguarding and Child Protection Policy*', '*KCSIE part one*' and for those who work directly with children '*KCSIE Annex B*', plus '*Annex C*' by school leaders. This policy takes full account of the child protection procedures agreed by the Kingston and Richmond Safeguarding Children Partnership (KRSCP) statutory guidance *WTTSC*, along with the Prevent Duty Guidance, our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour policy, and The Teachers' Standards.

Monitoring and Review: This policy is subject to continuous monitoring, refinement and audit by Sara Sangtabi (Head of Early Years) who is the DSL. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The Annual Review forms part of the Summer Term Governors Review Meeting. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies. The Proprietor recognises and builds the expertise of staff by undertaking safeguarding training and managing safeguarding concerns and ensures that child protection files are maintained as set out in Annex C in KCSIE. As such, staff can contribute to and shape our safeguarding arrangements and Child Protection Policy. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the update/reviewed policy and it is made available to them in either a hard copy or electronically.

The proprietor has ensured that a member of the senior leadership team, appointed as designated safeguarding lead (DSL), is able to discharge that role with sufficient independence. This is particularly in relation to any allegations involving the proprietor. The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The written confirmation of the appointment as DSL states that part of the duties of the post involve contacting the Local Authority Designated Officer (LADO) on any matter that the DSL considers cannot be properly dealt with internally. Our DSL is also provided with supervision and can already access advice as required without first referring to the proprietor. This enables there to be a separation between the DSL and the proprietor. Full details of the DSL's role can be found in Annex C of KCSIE 2025.

Date Reviewed: September 2025

Date of Next Review: September 2026

Signed: 

Mr Aatif Hassan, Proprietor

Legal Status Documents and References (statutory and best practice guidance). The links are reviewed annually and those below are the most recent guidance from each respective source.

- Part 3, paragraphs 7 (a) and (b) of the education (Independent School Standards)(England)(Amendment) Regulations (ISSR) currently in force; also in compliance with *Part 4 of the ISSR* with reference to the appointment of the Proprietor, all staff, external providers and volunteers inclusive of completion of the Single Central Record (SCR) otherwise referred to as the Centralised Register to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- This policy is consistent with [Keeping Children Safe in Education](#) (KCSIE) (DfE: September 2025)
- KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006](#) (2018)
- KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused](#) (HM Government)
- [Working Together to Safeguard Children](#) (WTTSC) (Inter-agency working) (HM Government: June 2025) WTTSC also refers to non-statutory but important advice, [Information sharing advice for practitioners providing safeguarding services](#) (2024) along with the [Disclosure and Barring Service](#) (DBS) Behaviour Policy
- [Kingston and Richmond Safeguarding Children Partnership Arrangements](#)
- [Prevent Duty Guidance: for England and Wales](#) (2024) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- [The Prevent duty: safeguarding learners vulnerable to radicalisation](#) (2023)
- [The use of social media for on-line radicalisation](#) (July 2015)
- [The Children ACT 1989 guidance and regulations](#) (DfE: Volume 2, July 2021)
- [Searching, screening and confiscation](#) (July 2022)
- [Mental health and behaviour in schools](#) (November 2018) and [Counselling in schools: a blue print for the future](#) (February 2016)
- [Children missing education Statutory Guidance](#) (HM Govt: 2024)
- [Sexual Offences Act 2003](#) (HM Government: 2024); [Definition of child sexual exploitation](#) (February 2016)
- [Child Abuse Image Database](#) (May 2024);
- [CSE Guidance Core Document](#) (February 2017); [Safer Recruitment Consortium](#) (October 2015)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (March 2024)
- [Mandatory reporting of female genital mutilation: procedural information](#) (January 2020)
- [Child Abuse and Neglect \(NSPCC\)](#) (2025)
- Statutory guidance - [Working Together to improve school attendance](#) (August 2024)
- The guidance [After-school clubs, community activities and tuition: safeguarding guidance for providers](#) (September 2023) details the safeguarding arrangements that schools should expect providers to have in place
- [DfE Data Protection guidance for schools](#) (DfE, 2025)
- Guide that supports children in the court system: [5 to 11 year olds \(HM Courts and Tribunals Service, 2017a\)](#)
- Martyn's Law: the SIA's regulatory role guidance [Martyn's Law: the SIA's regulatory role](#) (April 2025) [Terrorism \(Protection of Premises\) Act 2025: factsheets](#) (April 2025)
- RSHE Statutory guidance [Relationships Education, Relationships and Sex Education \(RSE\) and Health education](#) (2025)
- Teacher misconduct: [Teacher misconduct: the prohibition of teachers](#) (February 2022)
- Checking overseas teachers: [Criminal records checks for overseas applicants - GOV.UK](#)
- Individuals prohibited from managing or governing schools, checking section128s [Individuals prohibited from managing or governing schools - GOV.UK](#)(2025)

Please note that the local authority area has transitioned from Local Safeguarding Children Board (LSCB) to new 'safeguarding partners' – the local authority (LA), a clinical commissioning group (CCG) in the area and a chief of police for a local force. In the London Borough of Richmond upon Thames this is called the Kingston and Richmond Safeguarding Children Partnership (KRSCP). Our school is fully engaged in the new local safeguarding arrangements. A new system of child death review partner arrangements is also being put in place. Both these new systems feed into the new national Child Safeguarding Practice Review Panel the role of which is to promote improvement nationally. This policy follows the new arrangements set out by the Safeguarding Partnership. This policy was last reviewed and agreed by the Proprietor of the school in September 2025 and will next be reviewed no later than September 2026 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Children Missing or Absent from Education: Our procedures regarding children missing from education comply with our local Safeguarding Partnership and with KCSIE (September 2025) and are stated in this policy.

The child protection policy forms pages 1 to 27 of this document. The appendices are on pages 28 to 43. However, the inspectorate requires us to number all pages consecutively and not to have the appendices as separate documents. We have separate comprehensive document Safer Recruitment and Staff Selection, Sexual Violence and Sexual Harassment (Child-on-child abuse).

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KEY INTERNAL PERSONNEL

Designated Safeguarding Lead (DSL) and Prevent Officer for the whole school including the Early Years Foundation Stage and also Designated Teacher for 'Looked After Children' and online safety:

Miss Sara Sangtabi (Head of Safeguarding and Wellbeing, Head of Early Years)

ssangtabi@broomfieldhouse.com

Direct Line: 020 8940 3884

Mobile: 07984965536 (twenty-four hours)



Deputy Designated Safeguarding Lead (DSL) and Deputy Prevent Officer:

Mr Adam Anstey (Headteacher)

aanstey@broomfieldhouse.com

Direct Line: 020 8940 3884

Mobile: 07515 001 572 (twenty-four hours)

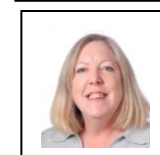
**Additional Deputy Designated Safeguarding Lead (DSL) and Additional Deputy Prevent Officer:**

Mrs Melissa Zammit (Head of KS2)

mzammit@broomfieldhouse.com

Direct Line: 020 8940 3884

Mobile: 07815 043 326 (twenty-four hours)

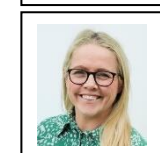
**Senior Leader Responsible for invacuation and lockdown and meeting the statutory guidance for Martyn's Law 2025**

Mrs Christine Doyle (Head of Operations)

cdoyle@broomfieldhouse.com

Direct Line: 020 8940 3884

Mobile: 07732 055 235 (twenty-four hours)

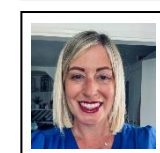
**DUKES Safeguarding officer for schools**

Ms Rachael Friend (Head of Safeguarding (Schools) HR & Compliance & Legal, Dukes - Central Support)

Rachael.friend@dukeseducation.com

Direct Line: 020 3696 5300

Mobile 07552 268782

**Governor with Responsibility for Safeguarding and online safety**

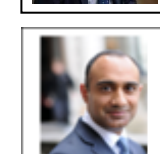
Mr David Goodhew (Managing Director, Dukes Education Board, Dukes - Central Support)

david.goodhew@dukeseducation.com**Chairman**

Mr Aatif Hassan (Founder and Chairman)

aatif.hassan@dukeseducation.com

Mobile: 07774 441 000 (twenty-four hours)

**KEY EXTERNAL CONTACTS**

External responsibilities and therefore details of any external personnel named below may be subject to change without notification to the school.

Allegations against staff are reported to the Headteacher who will then immediately inform **The Local Authority Designated Officer (LADO)** who is familiar with our methods and procedures, and with whom good lines of communication are kept. **The contact details are:**

AFC LADO SERVICE: Contact and Referral Officer – Julie Fisher, LADO – Jackie Alsop, Head of Service- Lorissa Webber

Email: LADO@achievingforchildren.org.uk

Telephone (office hours: 8am-6.00pm): 07774 332675

A SPA referral will be needed in addition to LADO service if a child has or may be harmed.

If the LADO is not available, please contact the Single Point of Access (SPA):

Telephone (office hours: 8am-5.15pm, Monday to Thursday, and 8am to 5pm on Friday): 020 8547 5008

Emergency Duty Team (out of hours service): 020 8770 5000

and ask to speak to a Duty Officer who can take your referral or assist with your inquiry. If a child is in immediate danger or left alone, you should contact the police or call an ambulance immediately on 999.

For concerns about children the contact is the Single Point of Access (SPA):

Telephone (office hours: 8am to 5.15pm, Monday to Thursday, and 8am to 5pm on Friday): 020 8547 5008

Emergency Duty Team (out of hours service): 020 8770 5000 [Online referral form](#)

and ask to speak to a Duty Officer who can take your referral or assist with your inquiry. If a child is in immediate danger or left alone, you should contact the police or call an ambulance immediately on 999.

Keeping Children Safe in Education (DfE: September 2025) makes it clear that anybody can make a direct referral to the LADO, which in respect of London Borough of Richmond upon Thames Council (Achieving for Children is the Children's Social Care provider) is the Richmond and Kingston Multi Agency Safeguarding Hub (MASH) and other external agencies. If a child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

We differentiate between safeguarding children who have suffered or are likely to suffer significant harm '*children at risk*' and those who are in need of additional support from one or more external agencies '*children in need*' or '*early help*'. **Concerns about a child:** If a child has suffered or is likely to suffer harm, the DSL must immediately report this to SPA. **Children in need of additional support from one or more agencies:** The DSL also refers pupils immediately to the SPA using the inter-agency assessment process through the Richmond and Kingston Multi Agency Safeguarding Hub (MASH) via a referral form, thus utilising the "Team around the Child" (TAC) approaches in line with the referral threshold set by the Local Safeguard Children Board. A direct referral can be made.

The Local Authority Prevent Lead (Mr Mark Wolski) for support and advice for the prevention of radicalisation is available on: 020 8831 6198 and on email: mark.wolski@Richmondandwandsworth.gov.uk. The non-emergency police telephone number is: 101 The Department for Education (DfE) dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264

If an adult working in our school has concerns or identifies a pupil as being at risk of radicalisation, the adult should immediately make a referral to our Designated Safeguarding Lead who is also our Prevent Officer who will consider the most appropriate referral which could include Channel or the SPA but will contact SPA initially on the numbers detailed above.

Female Genital Mutilation (FGM): It is mandatory for us to report any suspected cases of Female Genital Mutilation to the Police whose contact details are: For non-emergency 101 and for emergency calls 999. For advice and guidance telephone: 0800 028 3550 Email: fgmhelp@nspcc.org.uk The DSL will also contact SPA on the above numbers to report any suspected cases.

NSPCC Child Protection Helpline: 0808 800 5000

Childline: Tel: 0800 1111 www.childline.org.uk

The **NSPCC whistleblowing Advice Line** is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00PM, Monday to Friday and email: help@nspcc.org.uk

Other useful contacts for this policy:

Ofsted Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 0300 123 4666 Email: CIE@ofsted.gov.uk

Web: www.ofsted.gov.uk

Disclosure and Barring Service (DBS)

Address for referrals: PO Box 3961, Royal Wootton Bassett, SN4 4HF Helpline: 03000 200 190

Email: customerservices@dbb.gov.uk

Reporting Serious Teacher Misconduct [Online form](#)

If a child is in immediate danger or left alone, you should contact the police or call an ambulance immediately on 999.

Police Child Abuse Investigation Team – call 101.

Police Domestic Abuse Investigation Team – call 101

SEQUENCE OF EVENTS TO BE FOLLOWED WHEN A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT:

The following strict guidance relates to any disclosures involving events within or outside the school or concerning adults or other children.

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that they are not to blame. Tell the child that you know how difficult it must have been to confide in you. If there is a need for medical attention seek assistance without delay.

Listen to what the child has to say and take them seriously. Stay calm, reassuring the child but *advising that you cannot promise to keep a secret or assure confidentiality* (as this may ultimately not be in the best interest of the child). Tell the child what you are going to do next after the disclosure.

When talking to the child, do not interview the child and keep questions to a minimum. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue or make assumptions, which might give particular answers. Do not repeat the disclosure or ask the child to repeat their disclosure other than to clarify what is being said. Do not display shock or disbelief. Seek consent from the child to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told.

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. After the disclosure **record in writing** the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. When the child has finished speaking, do not leave the child alone, but speak to someone who can help keep the child safe. Call for immediate assistance from the DSL or Deputy DSL or follow the procedures for allegations against staff, volunteers, and Proprietors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. Do not ask the child to repeat what they have said to the DSL. The child has chosen to tell a member of staff and their account will be believed and actions taken accordingly. The official school safeguarding form should also be completed by the person who receives the allegation and forwarded to the DSL.

Do not take responsibility for investigating the allegation yourself, as investigation is the sole statutory responsibility of Children's Services and/or the police. Do not attempt to contact in any way any person mentioned in the disclosure. Reassure the child that you will ensure the matter will be dealt with. Immediately consult the DSL so that any appropriate action can be taken to protect the pupil if necessary. Only tell those people that it is necessary to inform; the DSL will consider the information and decide on the next steps. Until otherwise directed by the DSL, do not speak to anyone about the fact or content of the disclosure. Every complaint or suspicion of abuse from within or outside the school will be taken seriously and action taken in accordance with this policy.

Never take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse. Do not assume that someone else will take the necessary action. Do not speculate or accuse anybody, confront another person (adult or child) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told. Never fail to pass the information on to the correct person or ask a child to sign a written copy of the disclosure or a 'statement'.

ALLEGATIONS AGAINST STAFF, VOLUNTEERS, DSLS AND THE PROPRIETOR (SEE ALSO APPENDIX 5):

This applies where an adult within the school community has behaved in a way that has harmed, may have harmed, or poses a risk of harm to a child. This also applies when an adult within the school community may have possibly committed a criminal offence against or related to a child.

- Allegations concerning all other than the Headteacher is to be reported straight away to the Headteacher (or in his absence, the DSL). The Headteacher, will immediately contact the LADO to discuss the allegation. The individual, against whom the allegation is made, is not to be informed;
- Allegations concerning the Headteacher are to be reported straight away to the Chairman who will inform the LADO. The Headteacher is not to be informed;
- Allegations concerning a member of the Governing Body are to be reported straight away to the Headteacher without informing the member of the Governing Body. The Headteacher will be responsible for contacting the LADO and acting on the advice provided.

In each case, the Headteacher/DSL will refer to the LADO (Local Authority Designated Officer), within 24 hours via the SPA who will then advise regarding Police involvement and next steps, including any necessary investigation.

Arrangements for dealing with low level concerns or allegations (i.e. that do not meet the harms test) about teachers and other staff (including the head, governors, supply staff, volunteers and contractors)

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The staff behaviour policy (code of conduct) can be found in the teacher resources folder (TIC) in the teacher shared drive. The aim of code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as

to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the Headteacher without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be shared with the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. This can be made using the Neutral Notification form found in the Staff Room or on the TIC. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Headteacher will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing by the Headteacher. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for 6 years or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the Headteacher. The concern will be recorded in accordance with the school's low-level concern procedure, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

In borderline cases, where there is room for doubt as to whether a referral should be made, the Headteacher will consult with the LADO on a no names basis without identifying individuals. However, as soon as sufficient concern exists that a pupil may be at risk of significant harm, a referral to Children's Services will be made without delay. The school will not investigate allegations. In the case of an emergency, the Police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed following direction from the LADO. Broomfield House School will make every effort to maintain confidentiality and guard against publicity if there are allegations against teachers or staff up to the point where the accused person is charged with an offence. The following definitions will be used when determining the outcome of all allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Unsubstantiated, false or malicious allegations: Where an allegation by a pupil is proven to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance with the school's Behaviour and Sanctions Policy. Where a parent has made deliberately invented or malicious allegations, the Headteacher will consider

whether to terminate the pupil's placement at the school on the basis that they have treated the school or a member of staff unreasonably, unless a working relationship based on trust, respect and transparency is established moving forward. Broomfield House School reserve the right to contact the MASH to determine the appropriate action. We have a duty of care towards our employees by ensuring that effective support is provided for anyone facing an allegation through the school's Human Resources (HR)/Personnel arrangements.

ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Reasons for no longer using a person's services and reporting to the Disclosure and Barring Service (DBA) along with considering referral to the Teaching Regulation Agency (TRA). If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services and a prohibition order may be appropriate, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service and the TRA as soon as possible if the criteria are met, that is, they have caused harm or posed a risk of harm to a child. Referrals will be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. We would ensure that such reports include as much evidence about the circumstances of the case as possible. We would never use 'Compromise agreements' to prevent a referral being made to the DBS when it is legally required, nor an individual's refusal to cooperate with an investigation. The Proprietor of Broomfield House School is also under a duty to consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

CONTEXT AND STATEMENT OF PURPOSE

The Proprietors of Broomfield House School take seriously their responsibility to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm. The school has a duty to consider at all times the best interests of the child and to take action to enable all children to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility; although referrals are normally to be managed by the DSL, anyone may refer a child if necessary. Our approach at Broomfield House School is child-centred and at all times, we will act in the best interests of the child. Parents are encouraged to raise any concerns directly with the School, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

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

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

Abuse, Neglect and Exploitation (please refer to Appendix 1 of this policy): *Working Together to Safeguard Children* (HM Government, 2025) defines abuse as a form of maltreatment of a pupil. Somebody may abuse or neglect a pupil by inflicting harm, or by failing to act to prevent harm. Children may be abused by a family member, institution or a community setting, by those known to them or more rarely by others e.g. online abuse, any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

They may be abused by an adult or adults or another pupil or children. They may be abused through being witnesses to the ill-treatment of others, particularly when children see, hear or experience domestic abuse and its effects, and teenagers can suffer domestic abuse in their relationships. It is important to remember that significant harm can be 'actual' (happening now) or 'likely' (events are leading to a situation where harm is probable). To be considered a safeguarding concern or allegation, it is likely that some of the following features may be found (PENS):

- **Physical abuse** - violence, particularly pre-planned/deliberate; causing injuries such as bruises, broken bones, burns or cuts forcing others to use drugs or alcohol.
- **Emotional abuse** - also known as psychological abuse blackmail or extortion; emotional maltreatment; threats and intimidation.
- **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.
- **Sexual abuse** – indecent exposure/touching or sexual assaults/harassment; forcing others to watch pornography, sexting, encouraging other pupils to attend inappropriate parties; photographing or videoing other pupils performing indecent acts and **child sexual exploitation** in which children are sexually exploited for money, power or status.

Broomfield House School recognises that abuse, neglect and safeguarding issues are rarely safeguarding events that can be covered with one definition or label. In most cases multiple issues will overlap with one another. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, the National Society for the Prevention of Cruelty to Children (NSPCC) offers information for schools and schools on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/ We can also access broad government guidance on the issues listed here via the GOV.UK website: <https://www.gov.uk>

When a child is in need of *urgent* medical attention and there is suspicion of abuse an ambulance should be called. If the response from the emergency services states that the school should take the child to hospital then the DSL, with an escort, should take the child to the Accident and Emergency Unit at the nearest hospital. They should first notify MASH and seek advice about what action the MASH or the police will take and how the parents will be informed. Normally, parents would be informed that a child requires urgent hospital attention.

If the suspected abuse is sexual then the medical examination should be delayed until the MASH and the police can liaise with the hospital, unless the needs of the child are such that medical attention is the priority. There must at all times be a responsible adult with the child, whether from the school, MASH or the police, if the parents are not included. All unnecessary delays

should be eradicated and inaction at any level can and should be challenged.

The three main elements to our school's safeguarding policy are:

Prevention: Safeguarding children whether they are at risk of maltreatment or abuse or in need of specific local authority or inter- agency care. Our safer recruitment procedures include checking and recording the suitability of staff and volunteers developing procedures to deal with safeguarding issues, which may be specific to individual children in our school. The school seeks to actively promote the welfare of pupils at all times. Staff must be alert to situations where pupils appear to be unhappy or where there are marked changes in behaviour. The aim will be to 'listen' to pupils through the provision of early help, either through the school (counsellors, independent visitor) or through children's services under 'child in need' provision. We provide children with opportunities to share their worries of concerns including 'Worry Boxes' in each classroom and an online 'Help' form which can be completed anonymously if preferred.

Protection: Staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns following our agreed procedures. We:

- encourage a culture of listening to children, identifying and acting on early signs of abuse, neglect and exploitation, reassessing concerns when situations do not improve to ensure the right help at the right time to address risks and prevent risks escalating;
- ensure that allegations, concerns, suspicions and complaints against staff are dealt with promptly, and in accordance with DfE and local guidance. We keep accurate records and share relevant information quickly in order to challenge inactivity and
- we take all practical and appropriate steps to ensure that our school premises are as secure as circumstances permit.

Support: We support children who may have been at risk of significant harm (which includes the way staff respond to their concerns and any work that may be required) or children who have been abused, in accordance with their agreed child protection plan. We seek to address both the mental and emotional welfare of children and families through:

- the provision of individual counselling, providing a positive and safe school environment, careful and vigilant teaching, accessible pastoral care, good adult role models and by promoting full co-operation with and contributions to the provision of appropriate co-ordinated support and/or early help from external agencies.
- operating robust and sensible health and safety procedures and along with clear and supportive policies on drugs, alcohol and substance misuse and recognising that children have a right to feel secure and cannot learn effectively unless they do so.

Any adult can harm a child either by direct acts or failure to provide proper care, or both. This may be through neglect, emotional, physical or sexual abuse or a combination of such types.

Our children have the right to respect and protection from abuse, regardless of age, gender (including transgender), ability, language, religion, race, nationality, sexuality, culture or disability. They have the right to feel valued and confident, knowing how to approach adults if they are in difficulty. In our school a bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Our safeguarding and Child Protection Policy is also dovetailed with the Behaviour Management and Anti-bullying Policies. Whilst the school will work openly with parents as far as possible, the school reserves the right to contact Children's Services or the Police, without notifying parents if this is in the child's best interests. In preparing this policy, we have been attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. In Broomfield House School with the age range of rising 3 years (the term of the child's 3rd birthday) to 11 years we are aware of the potential scope for problems relating to emotional health issues, body image, eating disorders, self-harm, and also radicalisation and extremism. In the early years setting staff are required to look beyond the setting in order to understand and respond to the needs of young children.

This policy provides staff, volunteers and the Proprietor with the guidance they need in order to keep children safe and secure in our school and informs parents and guardians how we will safeguard their children whilst they are in our care. Broomfield House School promotes safe practice and professional conduct to safeguard children and to mitigate against the potential for misunderstandings or situations being misconstrued so teachers and other staff are not vulnerable to allegations. Our staff maintains an attitude of 'it could happen here' as far as safeguarding is concerned. We understand the importance of children receiving the right help at the right time to address risks and prevent issues escalating.

Definition of safeguarding from *Keeping Children Safe in Education* (DfE: September 2025): This is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that

children grow up in circumstances consistent with the provision of safe and effective care; providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, inside or outside the home, including online; and taking action to enable all children to have the best outcomes. Children include everyone under the age of 18.

The Difference between Safeguarding and Child Protection: Safeguarding is a broader term than child protection. It encompasses all the elements set out above and is what a school should do for all children; Child Protection is part of this definition and refers to activities undertaken to protect children who have been harmed or are at significant risk of being harmed. Policies and procedures for Child Protection are, therefore, included in the Safeguarding policy and procedures. Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this must be reported to the Richmond and Kingston MASH immediately. Action must also be taken to promote the welfare of child who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances must be addressed through inter- agency assessment using local processes.

Thresholds for Intervention: If staff have any concerns about a child's welfare, they should act on them immediately, following the procedures set out in this policy. Please see Appendix 4 which sets out the process our staff will go through if they have concerns about a child. Options will then include:

- managing any support for the child internally via the school or school's own pastoral support processes;
- an early help assessment; or a referral for statutory services (for example as the child might be in need, is in need or suffering or likely to suffer harm).

Early Help: In the first instance staff should discuss early help requirements with our DSL. The DSL will lead on liaising with other agencies and in setting up an inter-agency assessment as appropriate. Early Help in our school allows pupils to be supported at any point in their life by a range of external support agencies enabling potential concerns to be addressed, to prevent further problems arising or before a child may come into immediate danger. Targeted early help services, arranged by the local authority, address the assessed needs of a child and their family as a result of an *Early Help Assessment Form* coming under the term "*Team around the Child*" (TAC). This form would normally be completed by the DSL acting as the Lead Professional or another Educational agency. Our staff are, in particular, alert to the potential need for early help for a child who is not making age appropriate progress and needs support from more than one additional agency to meet the child's needs, or health or emotional difficulties are impacting the pupil's progress and/or wellbeing. Our staff are, in particular, alert to the potential need for early help for a child who:

- is disabled and has specific additional needs; has special educational needs (with an Early Help Care Plan or not);
 - is showing signs of engaging in anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - is frequently missing/goes missing from education, home or care;
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
 - has a parent or carer in custody or is affected by parental offending;
 - is misusing drugs or alcohol themselves;
 - is at risk of modern slavery, exploitation or trafficking (where children are recruited, moved or transported and then exploited, forced to work or sold);
 - is a young carer; is in a family presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
 - has returned home to their family from care and/or is showing early signs of abuse and/or neglect;
 - is at risk of being radicalised or exploited; is a privately fostered child.
- Link to Early Help Assessments [Early Help Assessment](#)

If the allegation threshold is NOT met, the LA Designated Officer will agree with you an appropriate response (E.g. for the agency to undertake further enquiries or undertake an internal investigation).

If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a senior manager / safeguarding lead, the LA Designated Officer, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed –e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached. After gaining consent from the child/family to share information gathered from discussions, relevant professionals

will be invited to come together to assess the child's needs and decided with the child/family a course of action to provide the services needed. This is a multi-disciplinary team of practitioners established on a case-by-case basis to support a child and their family.

Child in Need - S17 of the Children Act 1989: A 'Child in Need' referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required. Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:

- Child(ren) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority.
- Their health or development is likely to be impaired, or further impaired without the provision of such services.
- They are disabled
- This could include children who self-harm or disclose an intent to commit suicide.

Child Protection (S47 Children Act 1989): The Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. In order to understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.

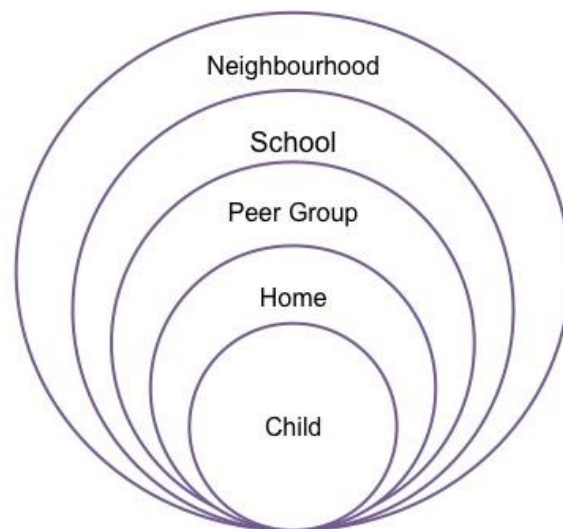
If staff or volunteers have significant concerns about any child they should make them known to the DSL. A referral to children's social care will be made immediately if there is risk of immediate harm to a child and, if a crime may have been committed, the matter will be reported to the police. It is important to understand that anyone can make a referral.

Working with our Safeguarding Partners: Broomfield House School will work with children's social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and will contribute to inter-agency plans to provide additional support to children subject to child protection plans. We allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 12 or a section 47 assessment.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

At our school we recognise that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social/public, as well as private, contexts in which young people spend their time. When spending time in these extra-familial contexts young people may be exposed to healthy norms which promote pro-social relationships, or they may encounter harmful norms that are conducive to abusive and exploitative relationships. As a result, we identify, assess and intervene where possible in all of the social environments where abuse and exploitation of young people can occur – in essence to take a 'contextual' approach to safeguarding.



For example, our school leadership works with professionals and student body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment. Additionally, we help to promote a culture of safety with the curriculum and around the school regarding pupils' online activities – a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse.

Serious Violence: Our staff are aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. If staff suspect that a pupil is at risk of serious violence, this will be reported to the DSL immediately. Please see the Home Office Guidance, which the school follows, on Preventing youth violence and gang involvement.

Concerns and allegations of abuse made against other children (Child-on-child Abuse inclusive of sexual violence or harassment and banter): We recognise that some pupils on occasion will negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Anti-Bullying (including Cyber-bullying) and Behaviour Management Policies. Staff are clear as to our policy and procedures with regards to child-on-child abuse. There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

We recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously. We make it clear that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'. Child-on-child abuse can take many forms, including:

- bullying (including cyberbullying);
- 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;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery) and
- initiation/hazing type violence and rituals.

We make sure that abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. When dealing with abuse by young people on peers, we follow the key safeguarding documents, *Keeping Children Safe in Education (DfE: September 2025)* and *Working Together to Safeguard Children* (HM Govt: 2025), even where an alleged perpetrator is a child and we adhere to the Human Rights Act and the Equality Act. Additionally, we use a **Child-on-child Abuse toolkit** to support staff in their safeguarding of our pupils. Sexualised abuse, including verbal abuse by peers is a safeguarding issue and is included in the school's broader approach to safeguarding. If the school received an allegation of abuse by one or more pupils but is alleged to have taken place outside of the school premises, our safeguarding principles remain the same, and we could still carry out a referral to children's services as necessary.

However, where there is 'reasonable cause to suspect that a pupil is suffering, or likely to suffer significant harm' the concern or allegation of child-on-child abuse must be reported to the DSL immediately, who will then refer to the Richmond and Kingston SPA to discuss the case. A factual record should be made of the concern or allegation, but no attempt at this stage should be made to investigate the circumstances. A copy of the discussions and outcomes will be kept in both pupils' files. Additionally, if appropriate the DSL will also refer pupils to an external safeguarding agency such as Childline and NSPCC.

Child-on-child abuse: Staff are clear as to our policy and procedures with regards to child-on-child abuse and are trained to manage a report of child-on-child sexual violence and sexual harassment. When dealing with abuse by young people on peers, we follow the key safeguarding documents, *Keeping Children Safe in Education* (DfE: 2025) and *Working Together to Safeguard Children* (HM Govt: 2025), even where an alleged perpetrator is a child. This will entail:

- effective implementation of our school's usual safeguarding and anti-bullying policies (and recognition that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue;
- seeking advice from statutory agencies, as appropriate, and readiness to make a referral if an incident meets the referral threshold set by KRSCP;
- if a child is in immediate danger or is at risk of harm, an immediate referral to children's social care and/or the police;
- following the advice for practitioners in: *What to do if you're worried a child is being abused*;
- effective information sharing with any agencies or other professionals involved;
- where allegations of abuse or assault have been made against one or more of our pupils, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all pupils and that both alleged victims and perpetrator pupils receive appropriate support.
- decisions arising that might include, for example, whether the accused pupil should be removed from our school for a period of time, or from certain classes; whether contact with certain individuals should be prevented or supervised,
- the availability of counselling, the adequacy of arrangements for listening to children etc;
- good record keeping of related conversations, meetings and communications.

Minimising the risk of child-on-child abuse: Broomfield House School recognises the wide variety of pupils' backgrounds and cultures who attend the school and as such, the requirement for us to promote pupils to respect, tolerate and show good will toward each other. We have employed a number of procedures to help minimise the risk of child-on-child abuse, with the majority of these focusing on educating our pupils about what is and what is not appropriate with regards to all forms of relationships with their peers. As part of our PSHEE and Relationship Education (RSE) lessons, we promote healthy and respectful peer-to-peer communications and behaviours between our pupils and provide an environment which challenges inappropriate behaviour. We teach our pupils to look out for potential signs that there may be an imbalance in power or control, the importance of permission-seeking and giving in relationships with friends, peers and adults and what to do to seek support. We make it explicit to our pupils what constitutes sexual harassment and sexual violence and why these are always unacceptable. We also teach our pupils about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help.

The School takes the following steps to minimise the risk of child-on-child abuse:

- We are a Listening School where students are encouraged to express concerns, pertaining to their own safeguarding or that of other students, to any member of staff.
- Our PSHE programme covers e-safety, anti-bullying, age-appropriate safeguarding and appropriate and respectful relationships.
- External programmes on e-safety and anti-bullying are given in the school.

Relationships Education and/or Relationships and Sex Education (RSE)

Relationships and Health Education (RSE/RSHE) is compulsory from September 2020 although the School had flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education. Relationships Education (RSE) forms part of the School's PSHEE programme. See separate RSE Policy.

Preventative education is most effective in the context of a whole-school or college approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These will be underpinned by the School's behaviour policy and pastoral support system, as well as by a

planned programme of evidence-based RSE delivered through our PSHE programme, in regularly timetabled lessons and reinforced throughout the whole curriculum.

Sexual Violence and Sexual Harassment between children: At Broomfield House School, we take our definition of sexual violence from the Sexual Offences Act 2003, which considers rape, assault by penetration and sexual assault, all types of sexual violence. In addition, we define sexual violence as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence and sexual harassment can be between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. We recognise that Children with SEND are likely to be more vulnerable. Broomfield House School is aware that online sexual violence or sexual harassment can be more complex, such as images shared at another school or across the internet, or the victim being excluded offline as well as online. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. We recognise that sexual violence and harassment can occur both online and offline, both physically and verbally and is never acceptable. We make it clear that all forms of sexual violence and harassment are unacceptable and will not be tolerated. Dismissing or tolerating such behaviours risks normalising them. We will follow up on any sexual harassment type behaviours even if the child does not understand that their actions may be perceived as sexual in nature. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- upskirting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (this may cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which might include: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography/ **fake pornographic images**, sharing other explicit images and online bullying, and **spreading / publishing disinformation / misinformation to others online**, non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats). Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

As a result of local learning, including around the website Everyone's Invited in March 2021, the School has a culture of prevention and education in order to raise responsible, caring adults. The school encourages respectful behaviour and language to be used to all; a restorative approach to incidents of concern; and a wish to make reasonable adjustments to encourage students to remain in education, despite any difficulties. There is no tolerance of discriminatory language or abuse towards staff or students. There will be no use of alcohol by staff on site or on school trips or residential units, when pupils are in their care.

Incidents of nudes and semi-nudes being shared by pupils: All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns. For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them. If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

Responding to reports of sexual violence and sexual harassment: Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Though it may not be necessary to report one-off issues of sexual harassment to the police, each allegation of abuse will be taken seriously, and the Designated Safeguarding Lead will still refer these allegations to children's social care, who will support the school in deciding whether the victim or alleged perpetrator are in need of protection or other services. However, all allegations of sexual violence will be reported to the police, in parallel with children's social care. Though children's sexual behaviours can be developmentally expected, some more harmful sexual behaviours may cause developmental damage. The Brook sexual behaviours traffic light tool is used to help us consider harmful sexual behaviours.

Reports of sexual violence are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as children's social care or the police. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

Further guidance and support can be found at:

- The Children's Society – Preventing Child Sexual Exploitation Guidance [Preventing Child Sexual Exploitation | The Children's Society](#)
- Centre of Expertise on Child Sexual Abuse – Guidance [Resources for education settings | CSA Centre](#)

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The immediate response to a disclosure report: A factual record should be made of the concern or allegation, taking the victim seriously, but no attempt at this stage should be made to investigate the circumstances, unless a child is in immediate danger or is at risk of harm, in which case, an immediate referral will be made to children's social care and/or the police. Every report will be considered on a case-by-case basis. Additionally, in cases where there is a report of rape, assault by penetration or sexual assault this should be passed to the police. Students will not be made to feel ashamed for making a disclosure. The DSL will follow the advice for practitioners in: [What to do if you're worried a child is being abused](#) and will follow through the outcomes of the discussion and if so advised by Children Social Care, will make a formal referral if the incident meets the referral threshold set by the Local Safeguarding Children Board ensuring effective information sharing with any agencies or other professionals involved. Good record keeping of related conversations, meeting and communications with a copy of the discussions and outcomes will be kept securely. Staff should not assume that someone else is dealing with the incident and

should discuss concerns with the DSL. Where an incident between two pupils takes place away from the school, the school's duties and procedures remain the same.

School Staff are trained as per Part One of KCSIE on how to manage a disclosure and are aware of anonymity in cases where an allegation is progressing through the criminal justice system. Broomfield House School will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media. The DSL will make an immediate written risk and needs assessment where there has been a report of sexual violence, considering the victim, alleged perpetrator and other children and staff at the school (including actions to protect them). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. However staff will be trained to never offer complete confidentiality as any incidences of a safeguarding nature may be needed to be passed to external statutory agencies. Risk assessments will be kept under review. In cases of sexual violence, a professional risk assessment by external specialists may be required and should be used to inform the school's own risk assessment. Broomfield House School will consider carefully any report of sexual violence or harassment and act in the best interests of the child. Broomfield House School will also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies. The school actively considers the risks posed to our pupils and ensures adequate measures are in place to protect pupils and keep them safe. Staff may be expected to participate in any early help assessment, child protection enquiry, strategy discussion or other outcome, following a referral.

With any report of sexual violence and/or harassment, the DSL will consider:

- the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- whether the child is disabled and has specific additional needs; any power imbalance between the children, including age gaps or differences in maturity, cognition or understanding (including SEND or learning difficulties) (with an EHCP or not);
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult students or school staff and
- is showing signs of engaging in anti-social or criminal behaviour, including gang involvement and association with organised crime groups; is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves; is at risk of modern slavery, trafficking or exploitation;
- is a young carer; is in a family presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence; has returned home to their family from care and/or is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited; is a privately fostered child and other related issues and wider context

Managing the report: Whatever the school's response, it is underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded. Dependent on the disclosure of sexual violence or sexual harassment, the school will consider the following courses of action:

- **Managing internally:** in some cases of sexual harassment (such as one-off incidents) the school may manage the incident internally, following our behaviour management policy;
- **Involve Early help:** this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- **Referral to children's social care:** in cases where there has been harm, or there is an immediate risk, a referral will be made to children's social care;
- **Reporting to the police:** in cases where rape, assault by penetration or sexual assault is reported. Broomfield House School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the police to ensure that the school's actions do not jeopardise the police investigation. The DSL will ensure any child has an 'appropriate adult' during police investigations. If a child is convicted or cautioned, the school will update the risk assessment and consider suitable action through their behaviour policy.

It is important for Broomfield House School to ensure the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken, or a child found not guilty, the school will continue to support the victim and perpetrator.

This is how victims of child-on-child abuse will be supported: All students involved, whether perpetrator or victim, are treated as being 'at risk'; a thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all students and that example, whether the accused student should be removed from school for a period, or removal of the alleged perpetrator from classes and any transport etc which is shared with the victim, whether contact with certain individuals should be prevented or supervised, the availability of counselling such as referring students to an external safeguarding agency such as ChildLine and NSPCC and the adequacy of arrangements for listening to children etc. We recognise that any actions taken will be in the best interests of both children and is not perceived to be a judgement of guilt of the alleged perpetrator.

Additionally:

- Support for the victim will consider their age, the nature of the allegations and the risk of further abuse; an alleged perpetrator may have unmet needs themselves.
- The needs and wishes of the victim will be paramount, and they will be able to continue their normal routine as far as possible.
- Broomfield House School will be prepared to support a victim over a long period of time.
- Where the victim or perpetrator moves to another school it is important that the new establishment is made aware of any ongoing support needs.
- Broomfield House School must ensure the victim is safeguarded, but still provide the perpetrator with an education and support as necessary.
- Broomfield House School may discipline the alleged perpetrator, including while the police or social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions.
- Broomfield House School will be clear about when their actions are to support the victim or perpetrator, and when their actions are to discipline the perpetrator for their past conduct.
- A student against whom an allegation of abuse has been made may be excluded from the school for a fixed period during the investigation and the School's policy on behaviour, discipline and sanctions will apply.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Children's Social Care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. Normally, the DSL will try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement to making a referral to the Richmond and Kingston MASH if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the Richmond and Kingston MASH or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the school will be involved in the enquiry or police investigation. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to exclude him / her during the investigation.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

When a pupil is in need of *urgent* medical attention and there is suspicion of abuse an ambulance should be called. If the response from the emergency services states that the school should take the child to hospital then the DSL, with an escort, should take the child to the Accident and Emergency Unit at the nearest hospital. They should first notify Richmond and Kingston MASH and seek advice about what action the Richmond and Kingston MASH or the police will take and how the parents will be informed. Normally, parents would be informed that a child requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the Richmond and Kingston MASH and the police can liaise with the hospital, unless the needs of the child are such that medical attention is the priority. There must at all times be a responsible adult with the child, whether from the school, Richmond and Kingston MASH or the police, if the parents are not included. All unnecessary delays should be eradicated and inaction at any level can and should be challenged. In borderline cases, this can be done informally and without giving names in the first instance. The School will not investigate allegations

without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed.

Working with parents and carers: Broomfield House School will, in most cases, engage with the parents of both the victim and the perpetrator and will consider carefully what information they provide. It is good practice for the School to meet the victim's parents with the victim present to discuss safeguarding arrangements and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place, such as moving them out of classes. Where there are doubts or reservations about involving the child's family, the DSL should clarify with MASH or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the school will be involved in the enquiry or police investigation. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to exclude him / her during the investigation.

Supporting witnesses of sexual violence or sexual harassment: Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school will do all it can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed. Social media is very likely to play a significant role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator and a very high likelihood that friends from either side could well harass the victim or alleged perpetrator online. When writing a risk-assessment for the pupils involved in an incident of sexual violence or sexual harassment, we will consider whether any additional potential support is needed to keep all our students safe.

All staff and volunteers: This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a pupil is at risk of significant harm or in need of support services. All staff and volunteers should be alert to pupils at risk of being radicalised or drawn into extremism or child sexual exploitation whether from an adult or another pupil (further details of these signs are in Appendix 1). They are required to report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL. Additionally they are expected to make themselves available for appropriate training if necessary out of normal school hours and to read both this policy and Part 1 of the latest edition of KCSIE and 'What to do if you are a worried a pupil is being abused' latest edition. Special arrangements will be put in place for anyone working in the school whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE.

Safer Recruitment, the Single Central Register (SCR) (Please also refer to our Safer Recruitment Policy) Our school operates safer recruitment procedures (in accordance with government recommendations) including required pre-appointment checks on teaching and non-teaching staff, volunteers, proprietors, supply staff, staff of contractors and other individuals working with or nearby pupils. The Single Central Register (SCR) of appointments is rigorously maintained. All employees, Proprietors, supply staff, volunteers and others working within the school are checked in accordance with the full requirements of the SCR before starting work and the details of these checks are recorded in the SCR. As a result of recommended good practice guidance in KCSIE 23, the school has undertaken research on publicly available information on short-listed candidates to any school position as part of the safer recruitment process. This is also made clear to candidates in any advertisements or application forms. Any material found online which may be considered inappropriate will be reviewed as part of a risk assessment process on whether the comments, views or photographs imply a potential risk of harm to children or could bring the school into disrepute. A conversation will also be held with the shortlisted candidate of any findings as part of the interview process itself. The school uses AI tools to aid online searches. For employees working with children under the age of 8 years there is a requirement to report to school managers any issues of association with people who may be barred from working with children.

Through risk assessments, the school also ensures that appropriate checks have been made upon the staff of other organisations working with our pupils on external trips and visits, including adults who supervise pupils on work experience. For work experience, the school will ensure that the placement provider has policies and procedures in place to protect children from harm. Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. In any case where the required documentation is unavailable or checks have not been completed prior to the starting date for any member of staff or other adult who may have access to pupils, then a

risk assessment will be carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date.

Safeguarding arrangements for staff employed by another organisation: The school will ensure that procedures are followed to satisfy itself that appropriate pupil protections (including DBS checks) and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (for example, on a school trip, while in a separate institution or activity centre). See policy on Educational Visits. Wherever possible Broomfield House School will obtain sight on DBS checks on all contractor staff, and they also receive safeguarding training from the DSL if required.

Organisations or Individuals using school premises

If the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), as with any safeguarding allegation, the school will follow our safeguarding policies and procedures, including informing the LADO.

Visitors and visiting speakers: Appropriate safeguarding and prevent duty checks upon visiting speakers and other visitors will be made and recorded. All visitors and visiting speakers will be required to undergo an identity check on arrival and wear a visitor's badge. They will not be allowed unsupervised access to pupils. The School keeps a visitor's book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. Unidentified visitors will be challenged by staff or reported to the Headteacher or School Office. A review of the presentation or workshop material planned to be delivered will be undertaken to ensure it is stage and age appropriate and does not contain any disinformation or misinformation (including fake news and conspiracy theories).

We have protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised. This will if appropriate include a barred list check and internet search, which will include online review of publicly available information and / or references / staff recommendations as deemed appropriate for the nursery school. At Broomfield House School, speakers are never left alone with pupils. The interaction between the *Prevent* requirement to check speakers and the KCSIE (September 2025) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers. In accordance with the ISSR, checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation.

The *Prevent* statutory guidance We have clear protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised; this will always include visiting speakers signing a confirmation that they understand our Prevent duties as a school and agree to speak and act within the letter and spirit of these duties. If a visiting speaker works for an organisation, then the organisation will provide a letter prior to the visit confirming their suitability to speak to our children. Where this is not possible then an internet search will be carried out. At Broomfield House School, speakers are never left alone with pupils. All visiting speakers are included in our Visiting Speakers log which will also contain details of what online searches / references have been obtained to ensure suitability to be in front of our children. The interaction between the *Prevent* requirement to check speakers and the KCSIE (September 2025) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers.

Preventing Extremism and Radicalisation: (Also please refer to our Preventing Extremism and Radicalisation policy and also Appendix 1 of this policy). Broomfield House School will also ensure that we can 'demonstrate activity', as required by the statutory guidance, in the following key areas: risk assessment of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, working in partnership, staff training and IT policies. This is wholly in keeping with our school ethos and approach to promote a broad, tolerant and open-minded understanding of the world around us, from EYFS onwards including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra and co-curricular activities, or in any other aspect of the school's activities. The school is able to demonstrate a general understanding of the risks affecting pupils and young people in the area.

Protecting pupils from the risk of radicalisation is seen as part of Broomfield House School's wider safeguarding duties, and is similar in nature to protecting pupils from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We understand that during the process of radicalisation, it is

possible to intervene to prevent vulnerable people being radicalised. We consider the level of risk of pupils identified as being at 'risk of radicalisation' and make an appropriate referral, which can include Channel or Children's Services. Our prevent strategy demonstrates a specific understanding of the risks affecting children and young people and identifying pupils who may be at risk of radicalisation, including support we can give.

Prevent duty: The DSL and DDSs receive appropriate training, in accordance with Annex C of KCSIE (including higher level Prevent awareness training) at least every two years in order to:

- Provide advice and support to members of staff on protecting pupils from radicalisation;
- Equip staff through Prevent, Channel and other appropriate training at least every two years to identify and assess pupils at risk of being drawn into terrorism and to challenge extremist ideas;
- Liaise with those responsible for Personal, Social, Health and Economic Education (PSHEE), Spiritual, Moral, Social and Cultural (SMSC) assembly and other appropriate curricular programmes actively to promote British values and to teach pupils about the dangers of radicalisation and extremism and
- Liaise with those responsible for the school's electronic systems seriously to limit through appropriate filtering mechanisms the scope for access through these systems to any website or Internet source deemed problematic from a Prevent perspective.

Teaching pupils how to Keep Safe (Educating pupils about safeguarding and radicalisation including the delivery of the Prevent Strategy): Our school ensures that pupils develop a clear understanding both of safeguarding issues and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers of radicalisation: our programme for PSHEE supports this process as part of a broad and balanced curriculum. Within our PSHEE curriculum, we have a programme for Relationship and Sex Education (RSE) which includes issues such as:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong and addressing cultures of sexual harassment;
- keeping safe whilst online and
- that sexual violence and sexual harassment is always wrong; and addressing cultures of sexual harassment.

We ensure that our pupils are aware of the importance of promoting positive relationships based on mutual respect. Through our school values, we encourage pupils to respect others, in particular within this topic. Age-appropriate anti-bullying assemblies are held in all phases of the school, each half term and include the risks of cyber bullying and on-line safety and child-on-child abuse, including how victims will be supported. Additionally, whenever appropriate subjects in the curriculum and co-curriculum activities will be used to reinforce the messages given. We follow the standards for safeguarding and protecting children in sport stated by the NSPCC Child Protection in Sport Unit NSPCC Standards for Safeguarding in Sport.

If a member of staff becomes aware of an allegation or suspected case, which involves sexting, inappropriate banter or sexual assault between young pupils, gender based or otherwise, this will be considered as a safeguarding concern and reported to the DSL, or DDSL if the DSL is unavailable, who will consider the allegation on a case-by-case basis. Depending on the severity of the case, this may involve the school's Anti-Bullying Procedures or the parents of the pupils involved and in more extreme circumstances the police. In the case of serious harm, Children's Social Care are informed from the outset.

Within Spiritual, Moral, Social and Cultural (SMSC) development, we instil within pupils values that build resilience and prevent pupils being drawn into radicalisation and extremism. We explore what extremism might look like and how this poses a threat to peace and we build resilience to radicalism by providing a safe environment for debating controversial issues. We actively promote British Values within our SMSC, and create an environment in which pupils know they are listened to and valued. We educate our pupils to reject violence and cruelty in 'whatever forms they take on whether it be from animal rights activists; Al Qaeda influenced groups, racist and fascist organisations or any other extremist group.

Emerging Technology including the Internet and social media (Please see our E-safety Policy and Use of Network, Internet and email Policy for more details): Our School recognises the impact of emerging technological skills which includes the use of information and communication technology (ICT). Our E-safety policy details the actions and behaviour required from pupils and members of staff in order to maintain a safe electronic environment and is based on current best practice drawn from a

wide range of sources. Our key message to keep pupils and young people safe is to be promoted and should be applied to both online and offline behaviours. Please refer to our E-Safety policy for further details including Acceptable Use policies. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

We ensure that pupils are safe from potentially harmful and inappropriate content including terrorist and extremist material when accessing the internet on school systems through appropriate levels of appropriate filtering and monitoring on school devices and school networks, internet safety rules and e-safety education with the curriculum in line with our **E-safety and Cyberbullying policies**. However, we are careful to ensure 'over blocking does not lead to unreasonable restrictions'. We have a whole school approach to online safety, including a clear policy on the use of mobile technology. We ensure staff are appropriately trained in online safety. Pupils understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise young people, especially pupils and vulnerable adults. We support parents in providing links to up-to-date advice and guidance on Internet-Safety, social media and on-line radicalisation through CEOP's Thinkuknow website: www.thinkuknow.co.uk

Technology, and risks and harms related to it, evolve, and change rapidly. Our organisation will consider carrying out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our young people face including the use of Artificial Intelligence (AI). Further guidance on the product safety expectations of AI in educational settings can be found at: [Generative AI: product safety expectation guidance](#)

Information and support: There is a wealth of information available to support us in keeping children safe online. The following is not exhaustive but should provide a useful starting point:

- www.disrespectnobody.co.uk
- www.ceop.police.uk
- www.saferinternet.org.uk
- www.internetmatters.org.uk
- www.pshe-association.org.uk
- www.educateagainsthate.com
- <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>
- Pearsfoundation.org.uk support on countering online conspiracies in schools

Use of mobile phones, cameras, electronic devices: Staff should not use personal mobile telephones in the presence of pupils and they must never be used for taking or storing images or recordings of pupils. Any images or recordings should only be taken or edited using school equipment and stored on the school's network and media storage system. Photographs or recordings should only be made where there is a legitimate school purpose. A pupil's privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Headteacher or parents of the pupil involved. The School's' ICT Acceptable Use Policy sets out the expectations for pupils and parents on the use of mobile phones and cameras whilst at the school. Staff should only use electronic devices capable of capturing images of pupils provided by the school. This is in line with the whole school policy on the use of mobile phones and cameras. The LADO is to be informed if there is any contravention of the school policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the school. EYFS mobile phones are to be stored in staff bags or in desk drawers during the school day. Parents and visitors are asked to have their mobile phones on silent or turned off while in the school.

When using their own devices, such as mobile phones, tablets and smart watches, staff and pupils are expected to connect to the school WIFI and turn off their 3G, 4G or 5G. The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. This includes being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake pornographic images, misinformation, disinformation (including fake news), racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism and conspiracy theories. Further detail of the school's approach to online safety can be found in the school's **E-Safety Policy and the ICT Acceptable Use Policy**.

EYFS – Additional requirements (Also please refer to EYFS Child Protection Additional Guidance)

This Safeguarding Policy, which applies to the whole school, also applies to the EYFS and details our procedures for safeguarding in the EYFS. We inform Ofsted immediately (on the same day), or as soon as is reasonably practicable, but certainly within 24 hours, of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere). This could include any other

abuse, which is alleged to have taken place on the premises, and of the action taken in respect of these allegations. Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse, neglect and exploitation (such as significant changes in a pupil's behaviour, deterioration in well-being, physical indications, or comments which give cause for concern), and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children.

Disqualification under the Childcare Act 2006 as amended 2018 - (early years and later years provision): Any member of staff, volunteer or student on placement working with children aged under eight during, pre- or after-school childcare, will be required to self-declare that they are not Disqualified under the Childcare Act. We identify and record which staff are covered by this. Staff and volunteers complete a form before the commencement of employment and annually that asks the following questions:

- Have you been cautioned or convicted of any offences against a child?
- Have you been cautioned or convicted of any violent or sexual offences against an adult?
- Have you been barred from working with children by the Disclosure and Barring Service?
- Have your children been taken into care?
- Has a court order been made in respect of a child under your care?
- Have you been refused registration or had registration cancelled in relation to childcare or a children's home or have you been disqualified from private fostering?

Induction and On-going Training for all staff, temporary staff, volunteers, the Headteacher and the Proprietor in line with Kingston and Richmond Safeguarding Children Partnership advice: Our arrangements for the level and focus of role-appropriate and refresher training is in accordance with the Kingston and Richmond Safeguarding Children Partnership criteria, as required by KCSIE (DfE: September 2025). All staff are provided with copies of key documents, which they are required to understand. For staff that cannot read English, our school takes steps to ensure that they understand key information. This includes the active promotion of British values and an understanding of extremism and radicalisation and child exploitation. All our staff are made aware of the systems, which support safeguarding in our school, and these are explained to them, as part of their staff induction. This includes:

- The Child Protection Policy (safeguarding policy); the identity of the DSL and Deputy DSLs and information about their roles (such as the implications for mental health and pastoral care and how to identify pupils at risk of radicalisation);
- The Staff Behaviour Policy (Code of Conduct) (which covers as a minimum, acceptable use of technologies, staff pupil relationships and communications, including via social media and whistleblowing) Part One of KCSIE (DfE: September 2025) and 'Annex A' (which includes some types of abuse formerly mentioned in Part One of KCSIE) and copies of policies (such as Behaviour Management Policy, Anti-Bullying Policy, Whistleblowing Policy and E-Safety including Cyber Bullying)
- Ensuring all staff are sensitised to act when any incident may be referred to as bullying, tyrannize, terrorise, intimidate, harass, etc., even if the alleged person has no history of that behaviour.
- The Children Missing Education and Missing Children Policy (Children Missing Education Policy); issues to consider and actions to take when a child's whereabouts cannot be established.

We assist staff in understanding and undertaking their roles and responsibilities as set out in Part One of KCSIE. All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This includes talking new staff through the content of Part One in a level and depth appropriate and proportionate to the person and/or to the particular role for which they are being inducted. The training is regularly updated. There are also in-service training and staff meetings. All staff undertake prevent awareness training and are able to refer pupils to the DSL for further help. Staff are informed of arrangements to listen to pupils by the use of counsellors, listeners, helplines and other systems to gain views and insight. We work in partnership with our local Prevent coordinator. When available in our local authority, WRAP (Workshop to Raise Awareness of PREVENT) training will be provided for all staff.

In addition, all staff receive safeguarding and child protection (including online safety) formal and informal updates (for example, via email, e-bulletins and staff meetings) as required, and **at least annually**, to continue to provide them with relevant skills and knowledge to safeguard children effectively. Our Staff are also made aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Leads, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Our staff are made aware of the process for making referrals to Children's Services and statutory assessments under the Children Act of 1989 that may follow a referral, along with the role they might be expected to play in such assessments. The DSL/Headteacher make it clear in induction, in other training, and in guidance provided for staff they have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. This is one part of our establishing a positive safeguarding culture. This applies not only to new staff but also those already in post.

Following consultation with the Kingston and Richmond Safeguarding Children Partnership (all staff members, contractors and the Proprietor will undertake appropriate child protection training regularly i.e. every 3 years as a minimum for all staff (Broomfield House School provide an annual update to all staff), with the DSL and Deputy DSL attending training every 2 years in line with requirements within KCSIE (DfE: September 2025), inter-agency working. Such training will include local inter-agency protocols and training in the Kingston and Richmond Safeguarding Children Partnership approach to Prevent duties. Prevent training is included at the beginning of school year INSET; we liaise with the Kingston and Richmond Safeguarding Children Partnership who provide the training.

Children who are particularly vulnerable: Vulnerable pupils: Broomfield House recognises that some children are more vulnerable to abuse, neglect and exploitation and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures, which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances, such as young carers or those with special educational needs or disabilities. Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these pupils will be reported immediately to the allocated Social Worker (and confirmed in writing).

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. Some children may also find it harder to disclose abuse due to communication barriers; lack of access to a trusted adult or not being aware that what they are experiencing is abuse. Our staff are alert to those pupils with longer-term medical conditions that are young carers or have special educational needs or disabilities. Particular vigilance will be exercised in respect of pupils who have a Child Protection Plan. Any incidents or concerns involving these pupils will be reported immediately to the allocated Social Worker (and confirmed in writing).

If a pupil discloses that he/she has witnessed domestic violence, or it is suspected that he/she may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue. Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to MASH and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or unexplainable and/or persistent absences from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Safeguarding disabled pupils and pupils with medical conditions: Our staff are aware that disabled pupils experience greater risks, vulnerability and barriers to services and resources. They may have additional needs relating to physical, sensory, cognitive and/or communication impairments. Some disabled pupils may be more vulnerable to abuse because it could be

assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; they may have fewer outside contacts (isolation) than other pupils; receive intimate, personal care; have an impaired capacity to resist or avoid abuse; have communication difficulties; fear losing services or; be more vulnerable to peer abuse (e.g. bullying, sexual assault, intimidation). Our staff are alert to the medical needs of pupils including those pupils with longer term medical conditions or disabilities and offer additional pastoral support to these pupils.

Listening to the wishes of pupils and young people: If Broomfield House School feels that a child is at '*risk of harm*' or '*in need*', a referral to the SPA will be completed regardless of the child's or parent's wishes. We believe it is critical that our pupils have an adult who they can trust and Broomfield House School ensures that there are appropriate systems so pupils know who they can turn to and that staff will listen to them. These include: the School Council; Teachers; School secretaries, Therapists; and Helplines such as NSPCC and the Child line. Broomfield House School actively encourages a sensitive and open 'listening' environment in which staff and pupils may feel free to discuss general matters relating to safeguarding and to raise specific concerns. Members of staff should use the school's whistleblowing policy if they have any concerns about the handling of safeguarding matters either in general or in specific cases, should they feel unable to raise concerns regarding child protection failures internally.

Looked After Children: The Proprietors will ensure staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a Local Authority, if they have such children on roll. This includes ensuring that there is a designated member of staff with responsibility for their welfare and progress and educational achievement and ensuring this person has up to date assessment information from the relevant Local Authority to ensure prompt action is taken where necessary to safeguard these children. The designated teacher will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. This includes the child's social worker and virtual school head, the most recent care plan and contact arrangements with parents, and delegated authority to carers including the child's legal status. In our school this person is the DSL.

See [Statutory guidance- Promoting the education of looked-after and previously looked-after children](#)

Pupil Mental Health: (Please also refer to the Broomfield House School Mental Health Policy) Broomfield House School takes its responsibilities towards pupils that may be experiencing mental health difficulties seriously. We provide support including having links with therapists, psychiatrists and the NHS. Our school staff meet with and support pupils throughout their Broomfield House School journey. The staff/faculty team being responsible for the safety and wellbeing of pupils, operate an 'open door' policy to encourage pupils to seek help themselves and for staff to refer any concerns so they are dealt with quickly and appropriately. We work closely with these professionals to maintain the pupil's safety within school and adhere to any advice and guidance we are given. We want to make sure our pupils are happy, healthy and thrive and understand we all need a little help from time to time with the busy and stressful lives we have today.

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils.

At Broomfield House School, our DSL is a certified Youth Mental Health First Aider and is our Designated Mental Health Lead. Concerns about a pupil's mental health should be referred in the same way as any safeguarding concern.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

Children Missing and Absent from Education (Please also refer to our policy for lost and missing children): All staff are aware that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to children with unauthorised absence or unexplainable and/or persistent absences supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. It may indicate Early intervention is necessary to identify the existence of any underlying safeguarding risk and to

help prevent the risks of a child going missing in future. More information can be found in 'Statutory guidance on children who run away or go missing from home or care' and KCSIE (DfE: September 2025). Guidance is here:

[Statutory guidance on children who run away or go missing from home or care](#)
[Children Missing Education - Guidance for Local authorities](#)

We will follow-up unexplained absences of any pupil with a telephone call from the school on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a pupil who is on a Child Protection Plan. Wherever possible, we will hold three emergency contact details for each pupil to make contact with a responsible adult if necessary. The DSL will also inform the applicable local authority of any pupil who has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority. Additionally, the DSL will notify the applicable local authority (within which the pupil resides) when not at Broomfield House School of any pupil who is going to be deleted from the admission register where he or she:

- Has been taken out of school by his/her parents and are being educated outside the school system e.g. home education; has ceased to attend Broomfield House School and no longer live within reasonable distance of Broomfield House School;
- Has been certified by a doctor as unlikely to be in a fit state of health to attend Broomfield House School before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend Broomfield House School after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and Broomfield House School does not reasonably believe he/she will be returning at the end of the period or, has been permanently excluded

The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. This will assist the local authority to fulfil its duty to identify pupils of compulsory school age who are missing in education and follow up with any pupil who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Notifiable Incidents: This is an incident involving the care of a pupil, which meets any of the following criteria:

- A pupil has died (including cases of suspected suicide) and abuse or neglect is known or suspected;
- A looked after pupil has died (including cases where abuse is **not** known or suspected);
- A pupil has been seriously harmed and abuse or neglect is known or suspected;
- A pupil in a regulated setting or service has died (including cases where abuse is **not** known or suspected).

Any such incident should be reported to the Kingston and Richmond Safeguarding Children Partnership Child Death Overview Panel (CDOP) coordinator whose contact details are by telephone 07469 100487.

Ofsted and the DfE along with the *Reporting of Injuries, Diseases and Dangerous Occurrences* (RIDDOR) in accordance with the regulations of 2013.

Physical chastisement: Where a pupil has been or alleges they have been subject to chastisement through the use of an implement or substance, this will immediately be reported for investigation to the LADO.

Physical restraint: Our policy on physical restraint is compliant with the DfE's '[Use of reasonable Force](#)' guidance. Events are recorded on CPOMS under the category 'Physical Intervention' and signed by a witness. This is then reviewed by SLT. Staff who are likely to need to use physical intervention are appropriately trained. We understand that physical intervention, of a nature that causes injury or distress to a pupil, may be considered under child protection or disciplinary procedures.

Pupils being withdrawn from school: If a pupil is withdrawn from the school, all efforts will be made to identify the school to which the pupil is being admitted; their confidential educational and pupil protection records will be sent separately. If the parent/guardian/carer fails to provide information regarding the new school, an urgent referral will be made to Children's Services. If educational records are sent to our school concerning a pupil who is not registered by the parent, they will be returned and the school advised to refer to their Local Authority Education Welfare Service. A pupil's name will only be removed from the school's Admission Register in accordance with the Child Registration Regulations. Further information is contained in our Admissions Policy.

Records and the sharing of information with relevant agencies: Written notes will be kept of all incidents relating to individual pupils. These may be shared with other agencies. All contact with parents and external agencies relevant to Child Protection will be logged and kept in confidential records, which are kept separate from educational records and can only be accessed by

designated people within the school. The content of Child Protection reports will be shared with the parents/guardians/carers in advance of any meetings. Referrals made to Broomfield House School and are recorded on the Inter-agency Referral form. All concerns, discussions and decisions made and the reason for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss this with the DSL. As part of meeting a pupil's needs we recognise the importance of information sharing between our professionals and local agencies and we follow procedures set out in *Working Together to Safeguard Children* (HM Gov 2018). Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

School website safeguarding statement: To ensure the privacy and safety of pupils where children are named, only their first names are given. When choosing photographs for the website, the school is mindful of the way pupils may appear in them, and will not include images which are in any way inappropriate. Broomfield House School follows a policy of seeking parent, guardian or carer's permission before using images which show pupils on the website or in the local press. The list showing pupils who are barred from appearing in the press, or on the website, is kept in the School Office and is available whenever photographers are present. No private information about pupils is published on the website such as surnames or contact details. The website is GDPR compliant and any concerns regarding breach of personal data can be referred to the Headmaster.

Staff Behaviour Policy (Code of Conduct) - power, positions of trust and staff behaviour: Guidance is provided in the Broomfield House School *Staff Behaviour Policy (Code of Conduct) and Teachers' Standards* on how adults can ensure 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 tuition, sports coaching, conveying a pupil by car, counselling and so on). The Staff Behaviour Policy (Code of Conduct) is wide-ranging and covers staff/pupils relationships (including working alone with pupils) and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. Staff must seek medical advice if they are taking medication which may affect their ability to care for children, and any staff medication must be securely stored and out of the reach of pupils at all times.

Corporal Punishment is prohibited for all pupils. The prohibition includes the administration of corporal punishment to a pupil during any activity, whether or not within the school premises. The prohibition applies to all 'members of staff'. These include all those acting *in loco parentis*, such as unpaid, volunteer supervisors.

Safeguarding pupils engaged in close, one-to-one teaching: We recognise that children may be more vulnerable when working with adults in a close one-to-one teaching provision. Please refer to the *Broomfield House School Staff Code of Conduct and Teachers' Standards* on how adults can ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, counselling and so on). The *Staff Code of Conduct* is wide-ranging and covers staff/students' relationships (including working alone with students) and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. The following guidance and arrangements have been taken from our Staff Behaviour (Code of Conduct) Policy which aim to safeguard pupils in one-to-one teaching situations:

- Staff must conduct themselves professionally in their relationships with pupils, parents and staff and must not behave in a way that could bring the School into disrepute or risk allegations being made.
- No member of staff should ever be behind a locked door with a child.
- One-to-one meetings should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door.
- When in a private meeting with a child or one-to-one session, staff should ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured.
- Staff will at no time travel unaccompanied outside of the School with children.
- Staff should ensure that a meeting is arranged during normal School hours when there are plenty of other people about;
- Staff will avoid sitting or standing in close proximity to the pupil, except as necessary to check work.
- Staff must report any incident that causes you concern to the Designated Safeguarding Lead in accordance with the School's Safeguarding and Child Protection Policy, and make a written record (signed and dated); and
- report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead or DDSL in the DSL's absence.

Whistleblowing: Our Whistleblowing Policy, which is on the school website, is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our school, a positive safeguarding culture. The school also has a culture of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the safeguarding regime, provision for mediation and dispute resolution where necessary. Staff can also self-refer using our *neutral notification* form. Training and support are provided for staff including transparency and accountability in relation to how concerns are received and handled. Our school has regard to KCSIE (DfE: September 2025) and as a result has clear processes for reporting and recording allegations. Anyone in the school can make a referral direct to the LADO or any other external statutory agency such as the police if they cannot get hold of any member of the safeguarding team or there is immediate harm to a child. In these cases the DSL would then need to be informed as soon after the referral. The NSPCC whistleblowing helpline is available for staff that does not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or Email: help@nspcc.org.uk

Working in partnership and responding to parents and carers: Our school works in partnership with parents/guardians/carers and local authorities communicating as clearly as possible with them (in particular with parents for whom English is not their first language) for the best outcomes for pupils. Parents are welcome to approach the DSL if they have any concerns about the welfare of any pupil in the school. If preferred, parents may discuss concerns in private with the pupil's class teacher or the Headteacher who will notify the DSL in accordance with these procedures.

Young carer: A young carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled, has a mental health condition or misuses drugs or alcohol. At Broomfield House School we recognise that being a young carer can have a big impact on the things that are important to growing up and the COVID-19 pandemic has exacerbated the situation for some of these children. The School seeks to identify Young Carers amongst our pupils and offer support where needed.

Our school operates these safeguarding procedures in line with locally agreed inter-agency procedures. Our Integrated Safeguarding Portfolio consists of the following legal status documents, related documents and references that have been used in formulating this policy along with the forms required to be completed when referring to Children's Services and the LADO and the Proprietor's annual Safeguarding Audit and Review.

Specialist Organisation: [Barnardo's](#), [Lucy Faithfull Foundation](#), [NSPCC](#), [Rape Crisis](#), [University of Bedfordshire: Contextual Safeguarding](#), [UK Safer Internet Centre](#)

Support for victims: [Anti-Bullying Alliance](#), [MoJ Victim Support](#), [Rape Crisis](#), [The Survivors Trust](#), [Victim Support](#)

Toolkits: [Brook](#), [NSPCC](#), [Safeguarding Unit](#), [Farrer and Co.](#) and [Carlene Firmin, MBE](#), [University of Bedfordshire](#)

Further information on confidentiality and information sharing: [Gillick Competency Fraser guidelines](#), [Government information sharing advice](#), [Information Commissioner's Office: Education](#), [NSPCC: Things to know and consider](#)

Further information on sexting: [UKCCIS: sexting advice](#), [London Grid for Learning- collection of advice](#)

This policy has been compiled in conjunction with and reference to the following related documents, which are:

- **Available on the Broomfield House School website and also on request from the School office:** Anti-bullying, Behaviour Management including Discipline, Sanctions and Exclusions; Preventing Extremism and Radicalisation Policy; First Aid Policy; Educational Visits (including Learning Outside of the Classroom (LOtC)); E-Safety including Cyber Bullying and Acceptable Use; Personal, Social, Health and Economic Education (PSHEE); Sex and Relationship Education (SRE); Special Education Needs and Disabilities (SEND Code of practice January, 2015); Spiritual, Moral, Social and Cultural (SMSC) Development; Whistleblowing, Staff Behaviour Policy (Code of Conduct); *Keeping Children Safe in Education Information for all school and college staff* (DfE: September 2025).
- **Available on the Staff Shared drive:** Safer Recruitment including the selection and appointment of staff; *Keeping Children Safe in Education. Statutory guidance for schools and college.* (DfE: September 2025); Appendix: Safer Recruitment Flowcharts.

Confidentiality: We regard all information relating to individual pupil or adult protection issues as confidential and we only pass information on to appropriate persons. The school will cooperate with Children's Services and Police to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in

accordance with the requirements of Working together to safeguard children (2025). Our staff know they cannot promise confidentiality and that there are other agencies which pupils can turn to e.g. Childline: 0800 1111.

APPENDIX 1 - TYPES AND SIGNS OF ABUSE, NEGLECT AND EXPLOITATION INCLUDING POSSIBLE INDICATORS, WHICH ARE IDENTIFIED IN KEEPING CHILDREN SAFE IN EDUCATION (SEPTEMBER, 2025)

Types of Abuse, Neglect and Exploitation Including Specific Safeguarding Issues: We are aware that abuse, neglect and safeguarding issue are rarely standalone events that can be covered by one definition or label. Abuse may take place wholly online, or technology may be used to facilitate offline abuse. In most cases, multiple issues will overlap with one another and could include:

Abuse, Neglect and Exploitation; Neglect (Physical or Emotional); Physical Abuse; Emotional Abuse; Peer Abuse; Extremism/Radicalisation; Domestic Violence; Drug/Alcohol Abuse; Emotional Abuse; Abuse of Trust; Sexual Abuse; Children who Sexually Abuse; Witnessing Domestic Abuse or Violence; Child Sexual Exploitation (CSE); Child Exploitation and E-Safety; Pupil Sexual Exploitation; Pupil Exploitation and E-Safety; Female Genital Mutilation (FGM); Forced Marriages; Fabricated or Induced Illness; Faith Abuse; Safeguarding Disabled Children; Disability and Vulnerability; Honour-Based Violence; Private Fostering; Elective Home Education; Vulnerable Groups; Bullying including Cyber Bullying; Vulnerable Pupils; Children in Need; Child with unauthorised absence or unexplainable and/or persistent absences; Children who are absent from education (particularly children who go missing on repeat occasions); Child Missing from Home or Care; Missing Children and Adults Strategy; Young Carers; Cared for Children and Significant Harm; Gangs and Youth Violence; Gender-Based Violence/Violence Against Women and Girls (VAWG); Hate; Mental Health; homeless; family members in prison; Preventing Radicalisation; Teenage Relationship Abuse; Sexting; Trafficking. Expert and professional organizations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/ and other government websites.

All School staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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

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 (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children with unauthorised absence or unexplainable and/or persistent absences; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child sexual exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections or become pregnant.

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners.

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

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

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. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect and exploitation, or 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, following this policy and speaking to the DSL or a deputy.

The DfE 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 and senior 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.¹⁷⁴

So called ‘honour based’ abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also

be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

Special educational needs and/or disabilities: Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children with SEND who are placed with alternative provision providers will be regularly monitored to ensure their whereabouts and levels of attendance are known. The suitability checks of staff and premises will be undertaken before any placement commences. Half-termly reviews will be undertaken to ensure suitable academic progress is being made, the quality of education delivery is maintained, and acceptable levels of attendance are met.

Lesbian, gay, bi or trans ("LGBTQ+"): Children who are LGBTQ+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

The School encourages children to speak out or share their concerns with members of staff in person or by using our 'Worry Boxes' or online 'Help' form, which can be completed anonymously if preferred.

The school take into account recent government guidance and any new guidance due to be issued on gender questioning and supporting those with autism who may be questioning their gender.

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

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. It can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who go missing from school: A child going missing from School is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the School's Missing Children Policy. All unexplained absences will be followed up in accordance with this Missing Children Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

'Working together to improve school attendance' (2024) guidance is now statutory [Working together to improve school attendance](#)

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 2 – SYNOPSIS OF THE MAIN RESPONSIBILITIES OF STAFF INCLUDING THE DSL AND DEPUTY DSLs:

Designated Safeguarding Lead (DSL) and Deputy DSL: They are members of the school's senior leadership (SLT) with the status and authority to carry out the duties of the posts of DSL/Deputy DSL and Lead Prevent /Deputy Prevent Officers. The Deputy DSL will act as DSL in their absence and otherwise will carry out safeguarding tasks and duties as specified by the DSL in accordance with the details set down below. The core responsibility of the DSL, is to take **lead responsibility** for safeguarding and child protection (including online safety), maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice. This is explicit in the job description. Our DSL is most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL, who has the status and authority within the school to carry out the duties of the post is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings—and/or to support other staff to do so—and to contribute to the assessment of children. Whilst the activities of the DSL may be delegated to appropriately to the DDSL, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

DSL Job Description: If the DSL is unavailable, the Deputy DSL will carry out these duties:

Managing Referrals includes: The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required, the LADO for child protection allegations which concern a member of staff or volunteer, the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a child and/or the police if a crime may have been committed;
- support staff who make referrals to local authority children's social care and the Channel programme;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- to liaise with the Proprietor for Safeguarding Issues along with informing SLT and key staff, alongside the DOFA (via weekly safeguarding and SLT meetings, daily updates where applicable and by email);
- keep staff aware of child protection procedures and ensure staff are alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Work with others: The Designated Safeguarding Lead is expected to:

- Liaise with the Headteacher to inform him of issues especially on-going enquiries under section 47 of the Children Act 1989 and Police investigations. Additionally, the DSL will liaise with the local authority in order to obtain 'early help' and support for pupils in accordance with Section 17 Children Act 1989.
- As required, liaise with the "Case Manager" (as per Part four) and the Designated Officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Undertake training, which includes: The DSL and deputy DSLs undergo training specific to be updated every 2 years (including prevent awareness training). In addition, they continually (and at least annually) refresh their knowledge and skills in order to keep up with any developments relevant to their role (this might be through e-bulletins, meeting other DSLs or reading new safeguarding developments) 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 and social care referral arrangements;
- 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;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff; are alert to the specific needs of children in need, those with special needs and young carers; are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness, which includes:

- Ensuring the school's Child Protection Policies are known, understood, used appropriately, reviewed annually (as a minimum) and the procedures and implementation are updated, reviewed regularly, and work proprietors regarding this;
- Ensuring the policy is made available publicly and parents being made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Linking with the Kingston and Richmond Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policy of safeguarding;
- Following up unexplained absences of any child with a telephone call from the school on the morning of the first day of absence and
- Raising awareness of the needs of pupils including those with special educational needs or disabilities and lesbian, gay, bisexual and transgender (LGBTQ+) pupils.

Child protection File: Where children leave our school, we ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. This will be transferred separately from the main pupil file, ensuring secure transit and a conformation of receipt should be obtained. In addition to a pupil's child protection file, our Designated Safeguarding Lead will consider if it is appropriate to share any information with the new school or college in advance of the child leaving, such as details of support given to victims of abuse, so as to have this established for then the pupil arrives.

Availability: During term time the DSL (or deputy DSL) should always be available during school hours for staff to discuss any safeguarding concerns. Broomfield House School will organise adequate and appropriate cover arrangements for any out of hours/out of school time activities including when the school is closed

All staff and volunteers: Safeguarding is everyone's responsibility. It applies to all who work, volunteer, learn, or supply services to our school. All staff and volunteers have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a pupil is at risk of significant harm or in need of support services. All staff and volunteers should be alert to pupils at risk of being Radicalised or drawn into Extremism or Child Sexual Exploitation whether from an adult or another pupil (further details of these signs are in Appendix 2). They are required to report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL. Additionally they are expected to make themselves available for appropriate training and to read both this policy and Part 1 of the latest edition of KCSIE and 'What to do if you are a worried a pupil is being abused' latest edition. Special arrangements will be put in place for anyone working in the school whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE.

Designated Safeguarding Lead (DSL) and Deputy DSL: They are members of the school's senior leadership (SLT) with the status and authority to carry out the duties of the posts. The Deputy DSL will act as DSL in their absence carrying out safeguarding

tasks and duties in accordance with Appendix 2. The DSL for the EYFS whilst having delegated powers will ensure that the DSL is kept informed of all safeguarding matters relating to the EYFS. The DSL and the DDSLs will receive formal update training every two years in line with KCSIE 23.

Chairman and Governor responsible for Safeguarding: The Chairman receives safeguarding training, which is refreshed in accordance with the SSCB criteria. The Chairman is provided with a weekly safeguarding report from the DSL as he has overall responsibility for all safeguarding matters relating to the pupils of the school. The Chairman will:

- Liaise with the senior leadership of the school, the DSL and Deputy DSL, holding them to account on matters relating to safeguarding and to liaise with the SSCB and LADO as and when required by this policy;
- Ensure that the annual review and report are jointly put together by the DSL with the minutes being sufficiently detailed to demonstrate both the breadth and the depth of the review;
- Ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.
- Check the staff's understanding and implementation of the policy, ensuring that all staff are aware of the referral process and how to implement safeguarding protocols;
- Create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.
- Monitor the policy, procedures and the efficiency with which they are implemented;
- Ensure that there are clear job specifications for the DSL and Deputy DSL;
- Find out by visiting the school if the policy is known in practice by talking to a number of staff and volunteers right across the school to see if they would know who to go to in the case of a suspected abuse and what they would do in terms of comments they might make to the child;
- Ensure that the DSL has the knowledge, skills and understanding necessary to keep safe children who are looked after by a local authority;
- Review how children are taught about safeguarding, including online, through the curriculum and PSHEE;
- Ensure that the school contributes to interagency working in line with the Working Together to safeguard children (HM Government, 2025) through effective communication and good cooperation with local agencies.
- Ensures the school manages health and safety with regular termly and annual audits and appropriate external advice being taken on the health and safety of members of the school community.

The Headteacher will:

- Ensure that the Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff to include:
- Allocate sufficient time and resources to enable the DSL and Deputy DSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively.
- Reporting wrongdoing by staff in the workplace that does not involve safeguarding and welfare of pupils is dealt with in accordance with the school's Whistleblowing procedures;
- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith;
- Ensure that pupil's safety and welfare are addressed through the curriculum and
- Be able to understand safer recruitment procedures and processes and deal with allegations against members of staff and volunteers.

APPENDIX 3: THE ROLE OF THE LADO (LOCAL AUTHORITY DESIGNATED OFFICER)

The role of the LADO is set out in *Working Together to Safeguard Children (2018)* and is governed by the Authorities duties under section 11 of the Children Act 2004 and KRSCP Policy and Procedures. This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self-employed. The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates 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.

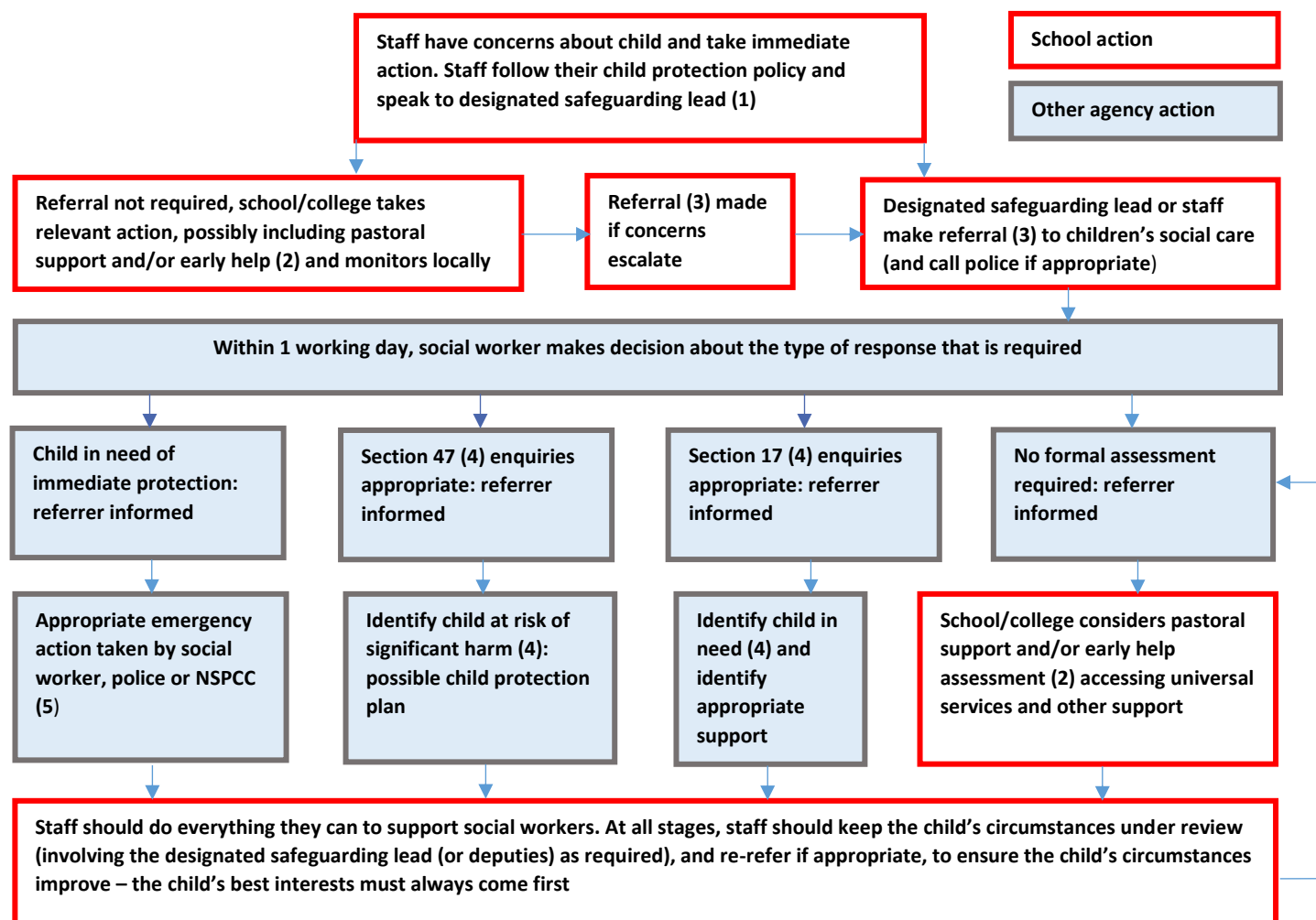
There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

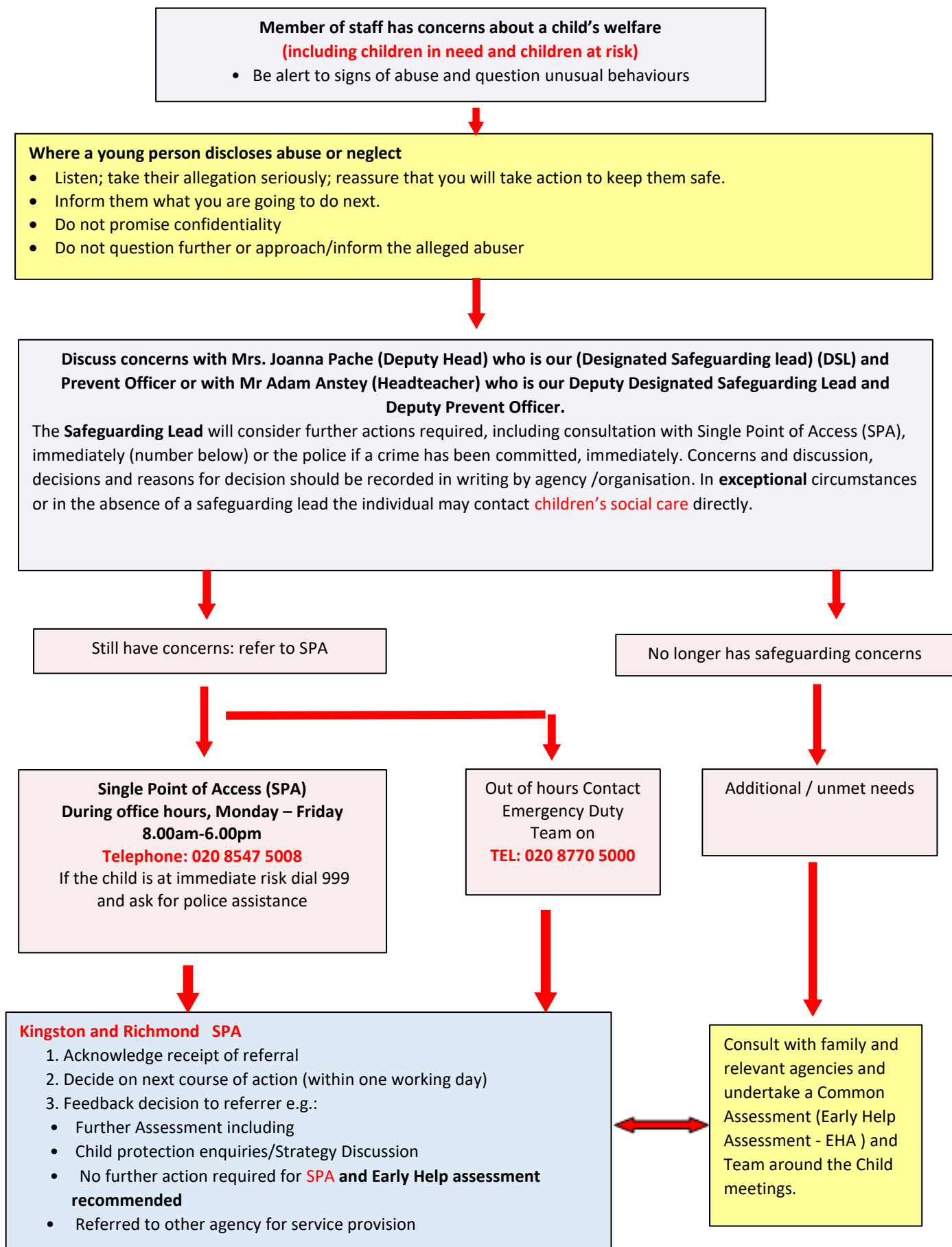
- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist the school in deciding whether there is a need to make a referral and/or take any immediate management action to protect a child.



- (1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
- (5) This could include applying for an Emergency Protection Order (EPO).

APPENDIX 5 - WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED OR NEGLECTED



APPENDIX 6 - WHERE A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT, THE FOLLOWING SEQUENCE OF EVENTS SHOULD BE ADHERED TO

Create a safe environment

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you.



Listen

Listen to what the child has to say and take them seriously; reassure the child but advise that you cannot promise to keep a secret. Do not make promises you cannot keep. If there is a requirement for immediate medical intervention, assistance should be called for. Tell the child what you are going to do next after the disclosure.



Talking to the child

When talking to the child, do not interview the child and keep questions to a minimum. Do not display shock or disbelief. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue, or make assumptions which might give particular answers. Do not repeat the disclosure over and over. Seek consent from the child to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told.



Record

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Record in writing the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. When the child has finished speaking, do not leave the child alone. Call for immediate assistance from the DSL or Deputy DSL or follow the procedures for allegations against staff, volunteers, and Proprietors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. The official school safeguarding form should also be completed by the person who receives the allegation and forwarded to the DSL.



Do not take responsibility

- Only tell those people that it is necessary to inform.
- Do not try to investigate the allegation yourself.
- Immediately consult our Designated Safeguarding Lead so that any appropriate action can be taken to protect the pupil if necessary.
- Do not approach or inform the alleged abuser.

If you become aware that a member of staff/volunteer may 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 or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to a child



Report immediately to Mr Adam Anstey (Headteacher) who would immediately inform the LADO.

However, if any concern or allegation is against the Headteacher then this must immediately be reported to the Chair of Governors without informing the Headteacher.

The contact details for the LADO are in the box below.



Report the allegation within one working day to the Local Authority Designated Officer (LADO) team:

- The LADO team: 020 8547 5008 - ask to speak to the LADO.
- If the LADO is not available, please contact the Single Point of Access (SPA) Richmond and Kingston Multi-agency Safeguarding Hub (MASH) Telephone (office hours) 020 8547 5008
- Emergency Duty team (out of hours service): 020 8770 5000



The LADO will:

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.



If the allegation threshold is NOT met, the Designated Officer will agree with you an appropriate response

(e.g. for the agency to undertake further enquiries or undertake an internal investigation)



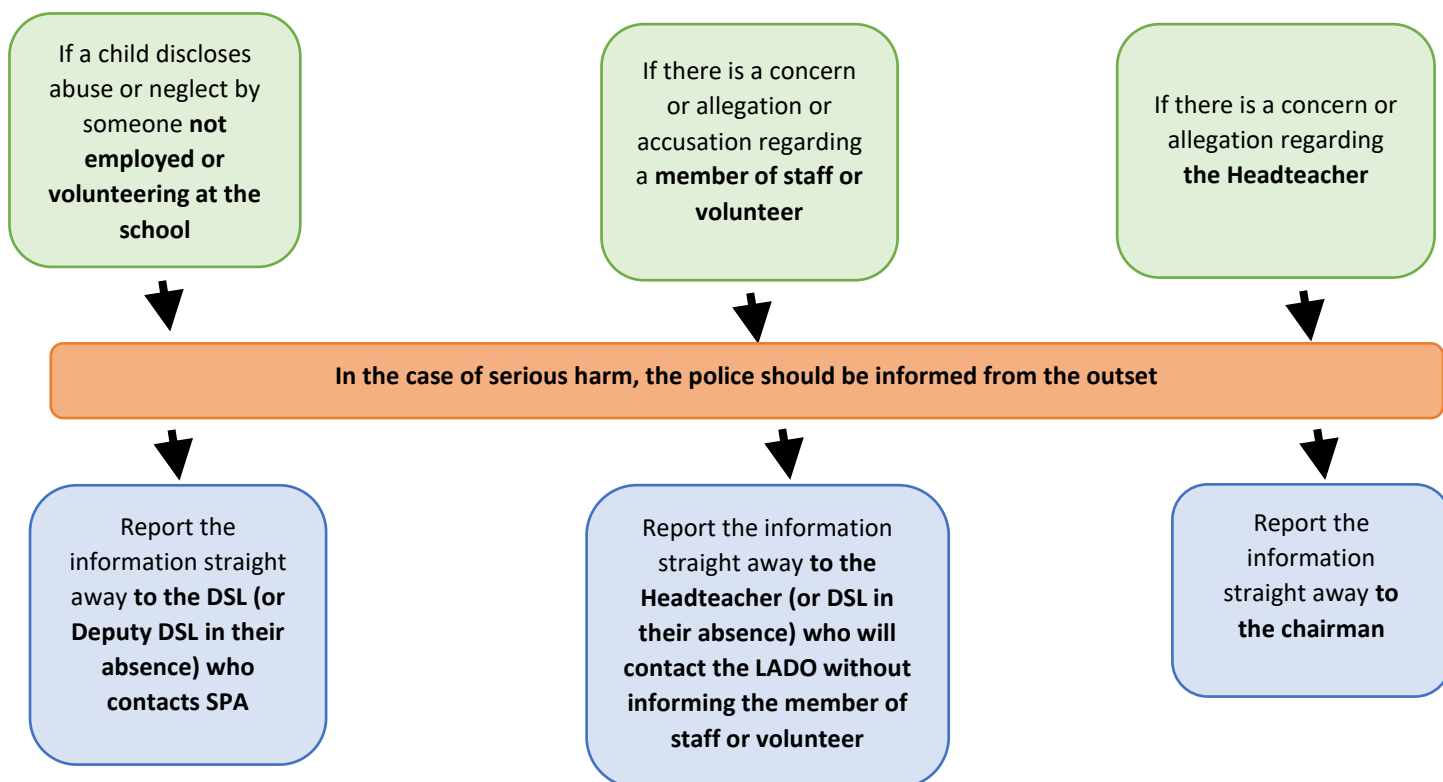
If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a senior manager / safeguarding lead, the Designated Officer, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed –e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

Keeping Children Safe in Education (DfE: September 2025) makes it clear that anybody can make a direct referral to the SPA including the LADO and other external agencies.

The contact for allegations against staff is the LADO and that for concerns about children the contact is SPA

APPENDIX 8 - SAFEGUARDING CONCERNS OR ALLEGATION OF ABUSE ON A CHILD

The following safeguarding procedures apply where you become aware a member of staff/volunteer has, or a child discloses to you that an adult has behaved in a way that has, or may have harmed a child; possibly committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates they may pose a risk of harm to a child.



- **DSL Contact Details:** Miss Sara Sangtabi (Head of Early Years)
Direct telephone: 020 8940 3884
Mobile: 07984 965 536 (twenty four hours) Email: ssangtabi@broomfieldhouse.com
- **Deputy DSL Contact Details:** Mr Adam Anstey (Headteacher)
Direct telephone: 020 8940 3884
Mobile 07515 001 572 (twenty four hours) Email: aanstey@broomfieldhouse.com
- **Designated Officer (LADO):** Jackie Alsop
Telephone: 07774332675 and ask to speak with the LADO Email: LADO@achievingforchildren.org.uk
- **Dukes Safeguarding officer for schools:** Ms Rachael Friend
Telephone: Email: Rachael.friend@dukeseducation.com
- **Chairman:** Mr Aatif Hassan
Mobile: 07774 441 000 Email: aatif.hassan@dukeseducation.com

Keeping Children Safe in Education (DfE: September, 2025) makes it clear that anybody can make a direct referral to SPA including the LADO and other external agencies.

A Child Protection Guide - A Cue Card

We are committed to safeguard and promoting the welfare of all at our school.

A code of good practice for staff and volunteers designed for you to keep with you – Carry it.

A Code of Practice is intended to provide a readily accessible reference promoting the principle of our Child Protection Policy.

What happens if:

You suspect a child is being abused or neglected:

1. Immediately inform the Designated Safeguarding Lead (DSL).
2. Record and date any facts which are relevant to your concern and pass these onto the DSL.
3. Do not investigate the issue yourself.

A child discloses to you abuse by someone else

1. Allow the child to speak without interruptions, accepting what is said and without investigating further or asking leading questions.
2. Reassure the child that 'it is not their fault' and that they were right to tell you.
3. Record in the child's own words details of the disclosure and refer this immediately to the DSL. Do not investigate the issue yourself.

You receive an allegation about a member of staff or yourself

1. Immediately inform the DSL of the allegation.
2. Record and date the details of the allegation in writing.

Do treat everyone with respect

Do provide an example of behaviour you wish others to follow

Do plan activities which involve more than one other person being present, or at least which are within sight or hearing of others

Do respect a young person's right to personal privacy

Do provide access for young people to talk to others about any concerns they may have.

Do recognise, and allow for, the special needs of young people with disabilities and learning difficulties

Do encourage young people with disabilities and learning difficulties

Do encourage children and adults to point out attitudes and behaviour that they do not like

Do avoid inappropriate physical or verbal contact with young people

Do remember that someone else might misinterpret your actions

Do respect the cultural, religious and ethnic backgrounds of others

Do recognise that caution is required even in sensitive moments of counselling

Do avoid situations that compromise your relationship with young people

Do NOT permit abusive peer activities (e.g. bullying racism or others)

Do NOT judge or jump to conclusions about others

Do NOT show favouritism to any individual

Do NOT be drawn into attention seeking behaviour, such as crushes/tantrums

Do NOT make inappropriate remarks or gestures

Do NOT rely on good reputation

Do NOT believe 'it could never happen to me'

Do NOT interview or meet with children in private or outside of school

Do NOT let concerns or allegations of abuse go unrecorded

Do NOT play physical contact games with young people

APPENDIX 10: The Organisation and relationship of Safeguarding and Pastoral Care Policies and Procedures at Broomfield House School

Ensuring that our community is collectively responsible and able to ensure that we keep our students safe at all times is fundamental aim for our School. Broomfield House School has developed a series of Policies and Procedures that are intended to support this endeavour. The following diagram illustrates the inter-relationship of these Policies.

