



## Brown's School Safeguarding and Child Protection Policy



<b><u>Full Name of Policy</u></b>	Safeguarding Policy
<b><u>Date of Approval</u></b>	September 2024
<b><u>Date of Next Formal Review</u></b>	September 2025



## **Introduction and Ethos:**

At Brown's School the Proprietor, Headteacher, Senior Leadership Team and Governing Body recognise the school's statutory responsibility to safeguard and promote the welfare of all children and young people and ensure that there is a whole school approach to safeguarding. Safeguarding and child protection are at the forefront of all we do and underpin all relevant aspects of process and policy development. Ultimately all systems, processes and policies operate with the best interests of the child at their heart.

The school accepts that safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes into contact with children and families at the school has a role to play in identifying concerns, sharing information and taking prompt action.

The definition of safeguarding in Keeping Children Safe in Education 2024 is as follows:

- ∞ providing help and support to meet the needs of children as soon as problems emerge
- ∞ protecting children from maltreatment, whether that is within or outside the home, including online
- ∞ preventing impairment of children's mental and physical health or development;
- ∞ ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- ∞ taking action to enable all children to have the best outcomes.

The Headteacher and Senior Leadership Team of Brown's School consider at all times, what is in the best interests of the child and ensure that there is a child centred and coordinated approach to safeguarding. To ensure that staff are fully supported in safeguarding pupils the school has a Designated Safeguarding Lead, a Deputy Safeguarding Lead and an appointed designated teacher for 'Looked After Children (LAC)' and previous LACs.

Designated Safeguarding Lead: Mr George Mitchell, Headteacher, (01689 876816), [georgemitchell@brownsschool.co.uk](mailto:georgemitchell@brownsschool.co.uk)

Deputy Safeguarding Lead: Denise Mitchell, Admissions and Pastoral Care Manager, (01689 876 816) [info@brownsschool.co.uk](mailto:info@brownsschool.co.uk)

There are nine other members of the school staff, including the Proprietor and Chair of Governors, that are trained to DSL level (Level3/Group 5), and form part of the Safeguarding Team.

Designated Teacher for 'Looked After Children': Mr George Mitchell, Headteacher (01689 876816), [georgemitchell@brownsschool.co.uk](mailto:georgemitchell@brownsschool.co.uk)

Proprietor: Ms Elaine Lovett (07584 415151).

Chair of Governors: Ms Sue Ponulak: [sueponulak@brownsschool.co.uk](mailto:sueponulak@brownsschool.co.uk)

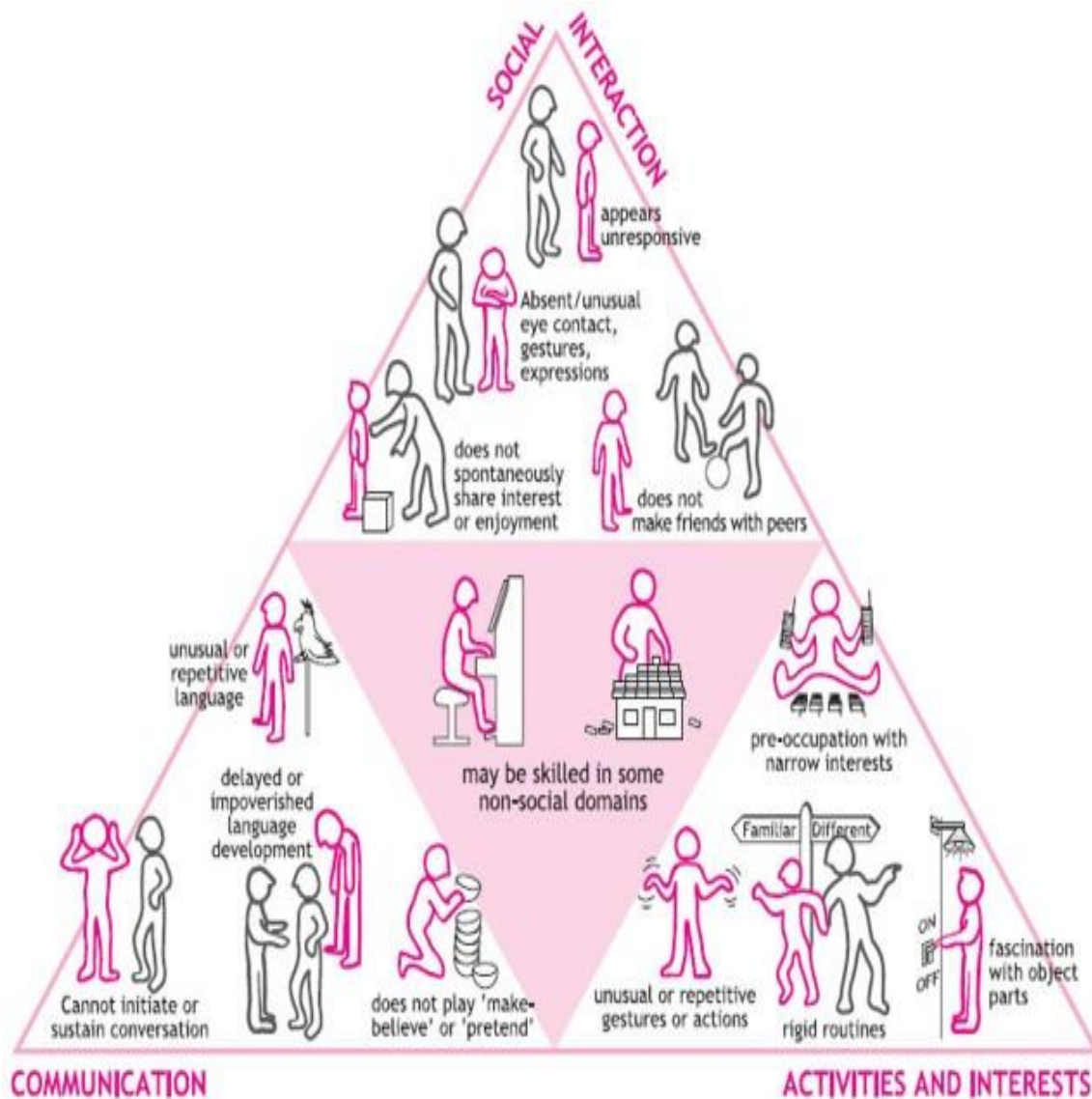
Governor responsible for Safeguarding: Mrs Jeanette May: [jeanettemay@brownsschool.co.uk](mailto:jeanettemay@brownsschool.co.uk)

Lead Officer for Education Safeguarding and Education Local Authority Designated Officer (LADO): Ms Gemma Taylor, 0208 461 7669, [lado@bromley.gov.uk](mailto:lado@bromley.gov.uk)



This policy has been developed in accordance with Keeping Children Safe in Education (DFE) 2024 and Working Together to Safeguard Children (DFE) 2023.

The policy should be read in conjunction with other school policies but particularly with the separate Child on Child Abuse Policy which contains information regarding the school's procedures regarding sexual abuse and sexual harassment.



The triad of impairment (Figure 1, above, originally devised in 1979 by Lorna Wing and Judy Gould) is a useful tool to refer to when educating pupils with complex needs (especially those with an ASD diagnosis). It is important to identify behaviours that may be perceived as “rude” but are actually a symptom of a pupils diagnosed difficulties. Brown’s School aims to work with pupils to modify undesirable behaviour through therapeutic intervention and staff recognise that behaviour associated with ASD/ADHD/ODD and other neurodevelopmental conditions take time to change.

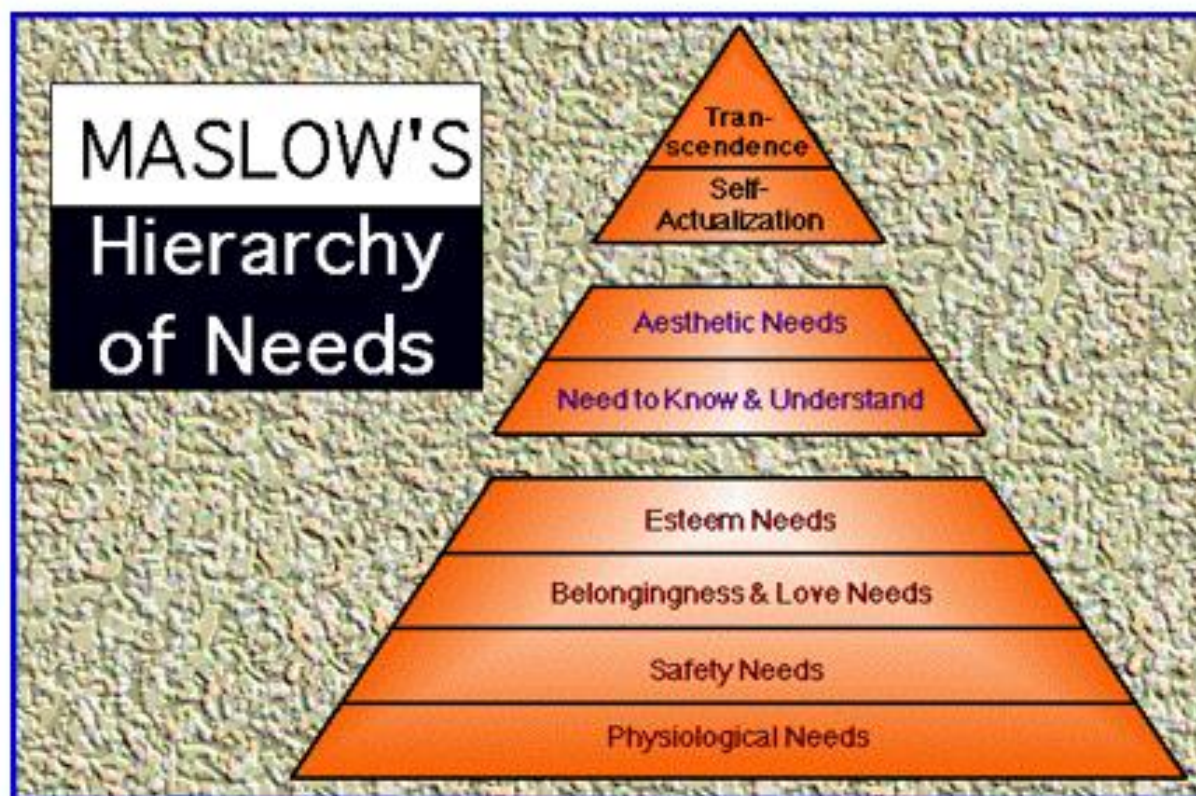


Figure 1: Maslow's Hierarchy of Needs - Huitt (2007)

Maslow's Hierarchy of Needs is another useful tool for educators. Many of the pupils at Brown's have a diagnosis of complex, co-occurring difficulties. Often behaviours displayed by our pupils are consistent with their individual diagnosis and make achieving learning difficult. For example, one of the common behaviours displayed by a pupil with ADHD is impulsivity. This behaviour could lead to a pupil not feeling safe in a classroom and therefore mean he is not able to access the learning of the lesson. In addition to this, pupils with difficulties in the classroom are well documented to struggle with "fitting in" and identifying with others, these are important factors to remember when a pupil exhibits undesired behaviour.

Brown's School is a specialist school and staff are mindful of the fact that children with special educational needs and disabilities have a higher risk of being isolated by their peers and are disproportionately affected by bullying. The school has a high level of mentoring and pastoral care to ensure that all children are supported in these areas. Pupils are explicitly taught social skills on a weekly basis by the school's Speech and Language Therapist and these skills are reinforced and modelled by staff throughout the day. Pupils also have opportunities to learn these skills through a carefully considered PSHE programme. A member of the Pastoral Care Team is available at all times to support pupils with concerns or worries and each pupil has an individually chosen listening ear/trusted adult. The school's therapy team, including Speech and Language Therapy, Occupational Therapy and Clinical Psychology, also support identified vulnerable pupils. Pupils have the opportunity to confide in their peers through regular peer mentoring sessions. Staff do not assume that if pupils are behaving in particular or different ways to their norm, or are looking distressed, that this is part of their disability or special education need but consider that this could be a sign of the potential for abuse.





**Aims:**

- ∞ The aims of our Safeguarding and Child Protection Policy are:
- ∞ To support the child's development in ways that will foster security, confidence and independence.
- ∞ To provide an environment in which children and young people feel safe, secure, valued and respected and in which they can learn.
- ∞ To ensure that safeguarding training at the school, including online training, is integrated, aligned and considered as part of the whole school safeguarding approach.
- ∞ To raise awareness of all staff, including volunteers, of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of physical, sexual and emotional abuse, as well as neglect (see appendix 1).
- ∞ To provide a systematic means of monitoring children known or thought to be at risk of harm and support those children within school.
- ∞ To develop and maintain a structured procedure within the school for identifying and reporting cases of suspected abuse which will be followed by all members of staff.
- ∞ To develop and promote working relationships with other agencies involved in safeguarding children, particularly Social Care and the Police ('Working Together to Safeguard Children', 2018).
- ∞ To ensure that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children, including verification of their identity, taking up references, an enhanced DBS check and a barred list check.
- ∞ To ensure that staff are aware of policies for safe practices including child on child abuse, anti-bullying, behaviour, health and safety and internet safety.
- ∞ To ensure that all parents/carers are aware of the school's Safeguarding and Child Protection Policy. An updated version of the policy is on the school website and it is also available as a hard copy from the school office.
- ∞ To ensure that the school has robust policies and procedures in place to ensure online safety, including making sure that appropriate filters and monitoring systems are in place in order to keep pupils safe online within school.
- ∞ To ensure that pupils are explicitly taught about safeguarding, including online safety, through the curriculum in PSHE and Social Skills lessons as well as specified days throughout the year, e.g. Safer Internet Day, Cyberbullying Day. Parents and students sign an Acceptable Use Policy which helps the school minimise inappropriate use of the internet and mobile phones during the school day. Information is presented in a way that is compatible with the needs of our students, mindful that some of the children may be victims of abuse. Due to the nature of our pupils' needs, the Headteacher and Senior Leadership Team have made the decision that pupils are not allowed unsupervised use of personal electronic devices whilst they are at school.



Staff:

- ∞ All staff have a responsibility to provide a safe environment in which children can learn.
- ∞ All staff should be prepared to identify children who may benefit from early help by bringing them to the attention of one of the school's DSLs.
- ∞ All staff know the procedure for reporting concerns. All members of staff are provided with a copy of the school's Safeguarding and Child Protection Policy, Code of Conduct and Behaviour Policy at induction and receive safeguarding induction training so that they understand school procedures, understand the role of the DSLs and know who to report a concern to.
- ∞ The names of the DSLs are clearly advertised in the school and on the school website.
- ∞ Staff also receive the Staff Handbook which references staff discipline, grievance policy and whistleblowing policy and a copy of 'Keeping Children Safe in Education' - Part one: 'Safeguarding Information for all Staff', Annex A & Annex B.
- ∞ Staff understand that any concerns should be reported to the DSLs. Concerns are recorded by staff on the 'My Concern' portal and the DSLs are verbally alerted; Staff can discuss any concerns with the DSLs in the first instance, however all verbal conversations should be promptly recorded on the concern portal. If the DSLs are not available, staff should speak to another member of the Senior Leadership Team. Staff are made aware that any staff member who has concerns about a pupil can refer directly to Children's Social Care in exceptional circumstances, such as an emergency or a genuine concern that appropriate action has not been taken. The DSLs will give staff feedback on any action taken, where appropriate.
- ∞ Staff that have been trained to DSL level meet fortnightly to discuss current issues.
- ∞ All members of staff receive appropriate safeguarding and child protection training which is regularly updated and, in addition, receive updates during staff meetings and inset days. This includes updates on issues such as Sexual Abuse and Sexual Harassment, Child Sexual Exploitation, Child Criminal Exploitation (including County Lines) Domestic Abuse, Female Genital Mutilation, Honour-based Abuse (see appendices).
- ∞ Staff are given the opportunity to contribute to the Safeguarding Policy and are encouraged to discuss the safeguarding issues affecting the school during regular weekly staff meetings.
- ∞ If a staff member has a concern about another staff member, this should be referred directly to the Headteacher, or where that is not possible, to the DSLs. Any concerns about the Headteacher should go, in the first instance, to the Proprietor of the school or to the Chair of Governors (see details on page 1) and concerns about the Proprietor should be made directly to the LADO.
- ∞ Any member of staff found not suitable to work with children will be notified to the appropriate bodies.
- ∞ Staff are aware of the early help process through the Common Assessment Framework (CAF) system and understand that they should liaise with the DSLs to report any emerging problems which they have identified regarding pupils.
- ∞ Staff are aware that the school has a Whistleblowing Policy and this should be adhered to. Should a staff member feel unable to raise an issue with the Headteacher or management, the NSPCC Whistleblowing advice line is available to staff to call for advice (0808 800 500) Monday to Friday from 8.00 am to 8.00 pm, email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)



- ∞ Staff recognise that children are capable of abusing their peers and understand the different forms of child on child abuse, including sexual abuse and sexual harassment. The school does not tolerate any form of child on child abuse. Any allegations of this will be investigated and dealt with following the procedures in the school's Child on Child Abuse and Behaviour Policies. Referrals to outside agencies will be made if appropriate. Any victims of child on child abuse will be supported by their trusted adult in school, and/or the pastoral care team, and/or the therapy team, as appropriate.
- ∞ Staff are made aware that children may be 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- ∞ Staff are aware that if they have a mental health concern about a child that is also a safeguarding concern and this should be reported to the Safeguarding Lead, Deputy DSL or the Mental Health Lead (George Mitchell).
- ∞ Staff are aware that children that identify as lesbian, gay, bi or trans (LGBT) can be targeted by other children. At Brown's all staff endeavour to reduce the additional barriers they may face by providing children with trusted adults and a safe space where they can be open and share any concerns they may have.

#### Training:

- ∞ The DSLs have completed Safeguarding for named and Designated Lead Professionals (Level 3/Group 5).
- ∞ All staff have completed the basic child protection/safeguarding training (Group1/2) delivered by Ken Palmer, Independent Safeguarding Trainer for Schools. The DSL updates staff on safeguarding and child protection issues in staff meetings and during inset training days throughout the school year.
- ∞ Members of the School's Governing Body take part in mandatory safeguarding training to ensure that they can assure themselves that the safeguarding policies and procedures in place at Brown's are effective. Their training is regularly updated.
- ∞ Four members of the school's Senior Management Team have attended Safer Recruitment Training delivered by Ken Palmer.
- ∞ All staff have attended WRAP training by Paul Smith UKCT Support Services Ltd, in line with Government recommendations under the Counter Terrorism and Security Act 2015 (The Prevent Duty) and/or have completed updated online training.
- ∞ Staff are regularly Team Teach (95% de-escalation, 5% restraint) trained so that they are confident to deal with any incidences of positive handling which may arise. All incidents are recorded formally in the school's 'Bound and Numbered book'. Positive Handling Plans for identified students help to reduce the use of physical restraint. The school recognises that there are times when an appropriate form of contingent touch, e.g. an arm around the shoulder, can be used when a child is upset. Staff are encouraged to use their professional knowledge, judgement and experience in such circumstances.
- ∞ Staff take part in online safety training so that they can recognise online abuse and have an understanding of it if it is reported by a pupil. Staff understand that there is no separation for young people between 'real life' and the 'online world' and that technology is a significant component in many safeguarding and wellbeing issues. Children and young people are at risk of abuse online as well as face to face and, in many cases, abuse will take place concurrently via online channels and in daily life



- ∞ Key staff are trained to regularly review the effectiveness of the filtering and monitoring systems and know how to escalate concerns when identified.

### **Role and Responsibilities of the Designated Safeguarding Lead**

The Designated Safeguarding Leads are members of the school's Senior Leadership Team. One of them is also a member of the Pastoral Care Team and is suitably placed to support staff and pupils alike with any worries or concerns they may have. The DSLs are completely independent from the Proprietor.

The DSLs will:

- ∞ Act as a source of support for all staff to discuss any safeguarding concerns.
- ∞ Act as a point of contact with safeguarding partners
- ∞ Ensure they undergo formal safeguarding training every two years and also update knowledge and skills at regular intervals, but at least annually, in order to update staff on current safeguarding issues.
- ∞ Refer a child if there are concerns about possible abuse and/or immediate serious harm to Children's Social Care (CSC). Referrals to CSC should be made on the day of disclosure and followed up in writing within 24 hours.
- ∞ Maintain a confidential recording system for safeguarding and ensure that all records are kept confidentially and securely and away from the main pupil files.
- ∞ Be aware of pupils who have a social worker and ensure that staff recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. The school takes these needs into account when making plans to support pupils who have a social worker and the DSLs ensure that they remain in regular contact with the social worker, attending Child in Need or Child Protection meetings as appropriate, to ensure the best outcome for these children or young people.
- ∞ Take lead responsibility for promoting educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement.
- ∞ Take lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
- ∞ Liaise and share information with other agencies and professionals to ensure the welfare and safety of the child. This includes attending case conferences or other multi-agency planning meetings, writing reports and contributing to assessments. The DSLs understand that any assessment should take into account risks outside the home/family (contextual safeguarding) and will ensure that any reports or assessments contain a comprehensive account of the child's social sphere, including exploitation by criminal gangs and organised crime groups such as county lines, trafficking, online abuse, teenage relationship abuse, sexual exploitation and the influence of extremism.
- ∞ Ensure that the following procedures are carried out for any pupil who is on the Child Protection Register: on day one of any absence from school one of the DSLs will telephone the home. If there is no reply from the home and/or there are concerns for the child's wellbeing the DSLs will contact Children's Social Care.





∞ Ensure that any new concern or relevant information about a child with a Child Protection Plan is passed to the child's allocated social worker on the same day

∞ Report any suspicion of a Private Fostering Arrangement to Social Care. Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a close relative. This is a private arrangement made between a parent and a 'carer' without the knowledge of the local authority, for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. Whilst most privately fostered children are appropriately supported and looked after, we understand that they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse, neglect or exploitation, or may be involved in trafficking, child sexual exploitation or modern-day slavery. Staff know that they should notify the DSLs if they become aware of private fostering arrangements. The DSLs will then speak to the family involved to check that they are aware of their duty to inform the local authority. On admission to the school, one of the DSLs who is also the Pastoral Care and Admissions Manager will take steps to verify the relationship of the adults to the child who is being registered.

∞ Initiate the Common Assessment Framework (CAF) or Early Help process if:

- staff concerns are raised around the progress of a pupil in terms of their health, welfare, behaviour, learning or any other aspect of their wellbeing.
- pupil/parent make a request for extra support.
- a child is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions and is at risk of being permanently excluded from school
- has a parent or carer in custody or is affected by parental offending

∞ Ensure that they are provided with sufficient time to liaise with each other regularly in order to discuss safeguarding issues.

It is important that children feel heard and understood and therefore the DSLs will be supported in developing their knowledge and skills to:

- ∞ Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
- ∞ Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.



### **Supporting Children:**

At Brown's school pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Pupils are taught to recognise when they are at risk and how to get help when they need it in lessons such as PSHE, ICT and Social Skills. This includes the NSPCC programme, Speak Out, Stay Safe. The Pastoral Care Team also discuss safeguarding issues with children who are at risk on an individual basis.

- ∞ We understand that children with disabilities are more vulnerable to abuse than non-disabled children and are more likely to be bullied (Safeguarding Disabled Children, 2009) therefore we have a clear and robust anti-bullying policy.
- ∞ The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.
- ∞ We recognise that a pupil who is abused or has witnessed violence/harm to others may find it difficult to develop and maintain a sense of worth and that, in these circumstances, may feel helpless and humiliated. We recognise that a child may feel self-blame.
- ∞ We understand that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- ∞ We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- ∞ Brown's School will support all students by:
- ∞ Encouraging self-esteem and self-assertiveness, whilst not condoning aggressive behaviour or bullying.
- ∞ Promoting a caring, safe and positive environment within the school where children feel secure, are encouraged to talk and are always listened to.
- ∞ Ensuring that all pupils know that there is a trusted adult in the school (listening ear) whom they can confide in if they are worried or in difficulty.
- ∞ Liaising and working together with all other support services and agencies involved in the safeguarding of children.
- ∞ Include in the curriculum opportunities to equip children with the skills they need to stay safe from harm, including PSHE and Social Skills lessons.
- ∞ Notifying Social Care as soon as there is a significant concern.
- ∞ Providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded to the pupil's new school under confidential cover.

The school has a separate Child on Child Abuse policy which sets out its procedures regarding sexual harassment and sexual assault. Any child who is affected by this is encouraged to talk to his/her trusted adult in school. Pupils have their own Safeguarding Policy which is discussed regularly with them by staff. A dedicated NSPCC helpline has been set up to provide both children and adults who are potential victims of sexual abuse in education with the appropriate support and advice. The number is: 0800 136 663



#### Supporting Staff:

- ∞ The school recognises that staff working in the school who have become involved with a child who has suffered harm, or appears likely to suffer harm, may find the situation stressful and upsetting.
- ∞ We will support such staff by providing an opportunity to talk through their anxieties with the Headteacher, DSL or school's Clinical Psychologist and to seek further support as appropriate.

#### Confidentiality:

The school has an Information Sharing Policy which is based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE 2018).

The school recognises that all matters relating to child protection are confidential. However, the Data Protection Act 2018, DfE Data Protection guidance for schools (DfE 2024) and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent, provided that there is a lawful basis to process any personal information required. However, the school recognises that it continues to be good practice to ensure transparency and to inform parents/carers that we are sharing the information for these purposes and seek to work cooperatively with them. The school understands that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their education outcomes.

Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority Children's Social Care.

Designated Safeguarding Leads keep records of concerns, discussions, and decisions, as well as rationales for any decisions made.

The Headteacher or DSLs will disclose any information about a pupil on a 'need to know' basis only.

All staff must be aware that they have a professional responsibility to share and disclose information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.



### **Allegations against staff:**

At Brown's school we recognise the possibility that adults working in the school may behave in a way that:

- ∞ Indicates they have harmed a child, or may have harmed a child;
- ∞ Means they have committed a criminal offence against or related to a child;
- ∞ Behaved towards a child or children in a way that indicates he or she 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.

In depth information regarding staff allegations can be found within our Allegations Against Staff policy which should be referred to if the situation arises.

All staff should feel able to raise concerns about poor or unsafe practice. The SLT will take all concerns or allegations seriously. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay, or, where that is not possible, to the DSL. Any concerns about the Headteacher should be reported in the first instance to the Proprietor and then to the Chair of Governors. The Proprietor will then inform the LADO within one working day.

Where there are concerns about the Proprietor of the school, the member of staff should contact the LADO without delay. The Senior Leadership Team understands that if a member of staff or volunteer is involved in an incident outside of school which does not involve children, it may still have an impact on their suitability to work with children and will take this into account.

The school acknowledges that safe practice, proper procedures and boundaries keep both pupils and staff safe. The school has a clear Behaviour Policy and Code of Conduct for staff to adhere to.

The school understands that a pupil may make an allegation against a member of staff. If such an allegation is made, the Headteacher will be informed immediately and staff will ensure that the child is safe and supported. The member of staff should then accurately record what they have been informed or observed.

Brown's School does not use supply teachers due to the special needs of its pupils, however the Senior Management Team understands that should this policy change in the future, the school will ensure that any allegations against supply teachers is dealt with correctly. This means that the school will not decide to stop using a particular supply teacher without finding out the facts and will take the lead in any investigation, liaising with the LADO to determine a suitable outcome.

Staff may have 'low level' concerns about another adult in the school. These concerns may not meet the threshold of harm, but are no means insignificant, and could include, but are not limited to:

- ∞ being overfriendly with children;
- ∞ having favourites;
- ∞ taking photographs of children on their mobile phone;
- ∞ engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- ∞ using inappropriate sexualised, intimidating or offensive language.

Low level concerns should be reported in the normal way and any reports will be dealt with in a sensitive and proportionate way by SLT and support will be given to the member of staff to correct any inappropriate 'low level' behaviour at an early stage. More detailed information can be found in the Allegations Against Staff policy.

Brown's School does not hire out the premises to outside providers for community activities, after school clubs etc.



#### **Safer Recruitment:**

- ∞ The school will implement their responsibilities for Safer Recruitment strategies as recommended in Keeping Children Safe in Education 2024, Part 3.
- ∞ This will include appropriate training for Headteachers and others who recruit and select staff and volunteers.
- ∞ As part of the Safer Recruitment process all staff being offered positions in regulated activity within the school will have their offers made subject to an enhanced DBS and barred list check and satisfactory references. Full details of the school's recruitment processes are documented in the Recruitment Policy.
- ∞ In addition to obtaining the above checks, anyone who is appointed to carry out teaching work will be checked to ensure they are not prohibited from teaching. For those engaged in management roles within the school, an additional check will ensure that they are not prohibited from engaging in a 'management role' under Section 128 provisions. This will include the Head Teacher, Senior Leadership Team and Governors. The school will inform shortlisted candidates that online searches may be carried out as part of due diligence checks.
- ∞ The Single Central Record is kept to record the following for all staff: an identity check, a barred list check, an enhanced DBS check, a prohibition from teaching check, a section 128 check, further checks on people who have lived or worked outside the UK, a check of professional qualifications and a check to establish the person's right to work in the United Kingdom.
- ∞ The school will ensure that appropriate checks are carried out to ensure that all staff who have direct contact with pupils, or who are directly concerned with the management of the school, are not disqualified under the Childcare Disqualification Regulations 2009.
- ∞ The school risk assesses volunteers to decide whether an enhanced DBS check should be undertaken.
- ∞ The school understands that we are responsible for the safeguarding of our pupils when they are placed in alternative provision and ensures that we obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff.

#### **Online Safety**

Due to the widespread use of personal devices, it is essential that Brown's School takes steps to ensure mobile phones and devices are used responsibly at school. The Headteacher and SLT are aware that unrestricted and unlimited access to the internet via mobile phone networks can result in some children, whilst at school, harassing their peers, including sexually, via their mobile phone and other smart technology devices. The school's Headteacher and SLT also feel that it is essential that pupil use of mobile phones does not impede teaching, learning and good order in classrooms. With both of these factors in mind, the Headteacher and SLT have made the decision that all electronic devices are collected before school starts at the beginning of the day at the school gate and returned to pupils as they are leaving the school premises at the end of the school day. For more information on online safety please see the school's E-safety policy.

#### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- ∞ Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- ∞ Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes





- ∞ Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- ∞ Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

When children use the school's network to access the internet they are protected from inappropriate content by our filtering and monitoring systems. The school will carry out an annual review of its approach to online safety, the filtering and monitoring systems that are in place, along with an annual risk assessment that considers and reflects the risks our pupils may face. The school's filtering and monitoring systems will block harmful and inappropriate content without impacting the student's teaching and learning.

The school will ensure that the appropriate level of security protection procedures are in place to safeguard our systems, staff and students; the effectiveness of these procedures will be reviewed regularly to keep abreast of evolving cyber-crime technologies.

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

CCE occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. This could be in exchange for something the victim needs or wants, for the financial or other advantage of the perpetrator or through violence or the threat of violence.

The victim may have been criminally exploited, even if the activity appears consensual.

CCE does not always involve physical contact, it can also occur through the use of technology.

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.

### **Children Absent or Missing from Education**

Knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse, neglect or exploitation and may also raise concerns about other safeguarding issues, including child sexual and child criminal exploitation, particularly county lines.

The School's DSLs monitor attendance carefully and address poor or irregular attendance as a matter of priority. At times this may mean involving other professionals, including Children's Social Care or the local authority Education Welfare Officer; this is particularly important if the child already has a Social Worker working with them and/or their family

The school has a written procedure for following up absence and we hold at least two up to date contact numbers for parents/carers. Parents are regularly reminded to update the school as soon as possible if the numbers change.



In response to the guidance in Keeping Children Safe in Education (2024) the school has:

- ∞ Staff who understand what to do when children do not attend regularly
- ∞ Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- ∞ Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
- ∞ Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a) leave school to be home educated
  - b) move away from the school's location
  - c) remain medically unfit beyond compulsory school age
  - d) are in custody for four months or more (and will not return to school afterwards); or
  - e) are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place, will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Further information can be found in 'Children Missing Education: statutory guidance for local authorities - September 2016', a copy of which is held in the Safeguarding Office.

### **Homelessness Duty**

The school understands that public authorities, including social care functions such as early help, leaving care and child protection should refer any young people they consider to be homeless, or threatened with homelessness, to a housing authority.

### **Mental Health**

All staff at Brown's School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the DSL immediately. This can be done initially through a conversation and followed up by a report on 'My Concern'.

The DSL will then decide what action is appropriate; whether that be a consultation with the school's Clinical Psychologist and Therapy team or a referral to an outside agency such as Child and Mental Health Services (CAMHS). The School has a well resourced Therapy Team comprising of a Clinical Psychologist, and Assistant Psychologist, Speech & Language Therapists and an Occupational Therapist.

If a young person at our school is admitted to a mental health facility, the DSL will consider a referral to social care.

The school has members of staff who have attended Mental First Aid training with the local authority.

The Mental Health Lead is the Headteacher, George Mitchell, who liaises regularly with the School's Clinical Psychologist, Murray Small.



### **Preventing Radicalisation and Extremism:**

- ∞ The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including schools, to have due regard for the need to prevent pupils from being drawn into terrorism ('The Prevent Duty').
- ∞ Senior management will ensure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism and challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups.
- ∞ Staff are aware that if they are concerned that any pupils are developing extremist views or show signs of becoming radicalised, this should be recorded and discussed with the DSL. All staff have completed WRAP training and/or updated their knowledge by completing online training.
- ∞ Staff are 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 proportionally which may include the DSL making a Prevent referral.
- ∞ Senior management will assess the risk of individual pupils being drawn into/supporting terrorism and refer them to Channel (contact for Bromley: Peter Sibley, 0208 313 4638, peter.sibley@bromley.gov.uk) or Children's Social Care.
- ∞ Any visiting speakers to the school will be vetted by Senior Management and appropriately supervised within the school.
- ∞ The school will ensure that British values are promoted within the delivery of the curriculum, extra-curricular activities and in the general conduct of the school. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. The Senior Management Team ensures that school is a safe place for pupils to discuss topics, including terrorism and extremist ideas and learn how to challenge these ideas.
- ∞ The school will ensure that pupils are safe from terrorist and extremist material when accessing the internet in school by establishing appropriate levels of filtering.
- ∞ The school has a separate Extremism and Radicalisation policy.

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

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- ∞ low level of integration into UK society
- ∞ mother or a sister who has undergone FGM
- ∞ girls who are withdrawn from PSHE
- ∞ visiting female elder from the country of origin
- ∞ being taken on a long holiday to the country of origin
- ∞ talk about a 'special' procedure to become a woman

Staff are aware of their statutory response if a disclosure of FGM is made. As well as reporting to the DSL/Deputy DSL, there is a legal duty on teachers to report this to the police following the guidance in KCSIE 2022.



### Legal Age to Marry

Since February 2023 it has been a crime to carry out any conduct with the purpose to cause a child to marry before they are aged 18; this is even if coercion or threats are not used. Forcing person into marriage is a crime in England and Wales. In line with existing **forced marriage law**, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### Elective Home Education

The Department for Education recognises that many home educated children have an overwhelmingly positive learning experience however it can also mean that some children are less visible to the services that are there to keep them safe and supported in line with their needs. Therefore, where a parent/carer has expressed their intention to remove a child from the school with a view to education at home, the school will work with other professionals to

coordinate a meeting with parents/carers. Ideally this will be before a final decision has been made to ensure that parents/carers have considered what is in the best interests of each child. This is of particular importance at Brown's where all pupils have SEND or are vulnerable and/or have a social worker.

### External Visitors

- ∞ Visiting Professionals - The school checks the ID and ensures that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed this).
- ∞ Contractors - The school sets out its safeguarding requirements in any contract between the school and the organisation concerned.

This policy should be read in conjunction with the following school policies and guidance:

- ∞ Child on Child Abuse Policy
- ∞ Behaviour Policy
- ∞ E-safety Policy
- ∞ Social Media Policy
- ∞ Extremism and Anti-Radicalisation Policy
- ∞ Attendance Policy
- ∞ SEND Policy
- ∞ Staff Code of Conduct
- ∞ Mental Health and Wellbeing Policy
- ∞ Keeping Children Safe in Education (Part one and annex A & B)

Reviewed in Staff Meeting

Person responsible for editing: Denise Mitchell/George Mitchell in September 2023

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Headteacher

\_\_\_\_\_  
Date

This policy will be reviewed in September 2025.



## Appendices

These contain important additional information about specific forms of abuse and safeguarding issues. For more detailed information, including signs to look out for, staff should read Annex B of Keeping Children Safe in Education 2024

Appendix 1: Types of abuse, neglect and exploitation signs and symptoms

Appendix 2: Child Abduction and Community Safety Incidents

Appendix 3: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Appendix 4: County Lines

Appendix 5: Domestic Abuse

Appendix 6: Female Genital Mutilation

Appendix 7: Honour-based Abuse

Appendix 8: Modern Slavery and the National Referral Mechanism

Appendix 9: Cybercrime

Appendix 10: Homelessness

### Appendix 1: Types of abuse, neglect and exploitation; signs and symptoms

All 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. (Keeping Children Safe in Education (September 2022) Paragraphs 26 - 30)

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Abuse or harm to a child(ren) can include witnessing the ill-treatment of others; this is particularly relevant when children see, hear or experience domestic abuse and its effects.

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

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

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





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

#### Appendix 2: Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, making their own way to school) it is important that they are given practical advice on how to keep themselves safe. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

#### Appendix 3: Child Sexual Exploitation (CCE) and Child Sexual Exploitation (CSE)

Different forms of harm often overlap and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money gifts or affection) and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

The full guidance: Child sexual exploitation: guide for practitioners (DfE 2017) and Criminal Exploitation of children and vulnerable adults: county lines (2017, updated 2020) are available in the Safeguarding Office.

#### Appendix 4: 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 forms of 'deal line'. This activity can happen locally as well as across the UK. 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 (mainstream and special), further and higher education institutions, pupil referral units, children's homes and care homes.



Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines.

#### Appendix 5: Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected'.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Operation Encompass operates in all police forces across England, helping police and schools to work together to provide emotional and practical help to children. Further details can be found at [www.operationencompass.org](http://www.operationencompass.org)

Refuge runs the National Domestic Abuse Helpline which can be called free of charge 24 hours a day on 0808 2000 247.

#### Appendix 6: Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Staff should not assume that FGM only happens outside the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Signs for staff to look out for include:

- ∞ low level integration into UK society
- ∞ mother or a sister who has undergone FGM
- ∞ girls who are withdrawn from PSHE
- ∞ visiting female elder from the country of origin
- ∞ being taken on a long holiday to the country of origin
- ∞ knowledge that the family belongs to a community in which FGM is practiced and awareness that preparations are being made to take the child on holiday
- ∞ planned absence from school the child may talk about a 'special procedure/ceremony' that is going to take place

Indications that FGM may have already taken place include:



- ∞ difficulty walking, sitting or standing and may even look uncomfortable
- ∞ spending longer than normal in the toilets due to difficulties urinating
- ∞ spending long periods away from classes or other normal activities, possibly with bladder or menstrual problems.
- ∞ prolonged absence from school with noticeable behaviour changes on return
- ∞ talk of something somebody did to them that they are not allowed to talk a prolonged absence from school with noticeable behaviour changes on return
- ∞ frequent urinary, menstrual or stomach problems
- ∞ a child complaining of pain between their legs
- ∞ reluctance to undergo normal medical examinations

### **Mandatory Reporting Duty**

The Serious Crime Act 2015 places a statutory duty upon professionals, including teachers, to 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. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases.

More detailed information on FGM may be found in the Government's Multi-agency statutory guidance on female genital mutilation (April 2016), a copy of which is held in the school's Safeguarding Office.

### **Appendix 7: Honour-Based Abuse (HBA)**

So called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing. All forms of so called HBA are abuse, (regardless of the motivation) and should be handled and escalated as such. Staff should have an awareness of these crimes in order to identify and report concerns to the Designated Safeguarding Lead as a matter of urgency.

### **Appendix 8: Modern Slavery and the National Referral Mechanism (NRM)**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance – Modern Slavery: how to identify and support victims, GOV.UK ([www.gov.uk](http://www.gov.uk)).

### **Appendix 9: Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber-dependent’ (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:



- ∞ unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- ∞ denial of Service (Dos or DDos) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- ∞ making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the internet to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child, the Safeguarding Leads should consider referring into the Cyber Choices programme, a nationwide police programme which aims to intervene where young people are at risk of committing or being drawn into low level cyber-dependent offences.

Additional advice can be found at: Cyber Choices, NPCC – When to call the Police and National Cyber Security Centre – NCSC.Gov.UK

#### Appendix 10: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. DSLs should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.