



# Safeguarding and child protection policy

<b>Key statutory guidance</b>	<a href="#">'Keeping Children Safe in Education' 2023</a>
<b>Independent school standards</b>	Paragraphs 7 and 34.
<b>Last updated by senior leaders</b>	August 2023
<b>Last reviewed by advisory board</b>	August 2023
<b>Next review due</b>	August 2024

## CONTENTS

- **Part one: core policy**
- **Part two: managing allegations, including ‘low-level’ concerns**
- **Part three: key areas of concern to be aware of and alert to, including sexual violence and harassment**
- **Part four: indicators of harm for the most common forms of abuse**
- **Part five: safer recruitment**

## PART ONE

### Introduction

St. John’s Preparatory & Senior School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The health, safety and welfare of all our children are of paramount importance to all the adults who work in our School. We aim to create a culture of vigilance and promote the health, well-being and safety of the pupils in all we do. Our children have the right to protection, regardless of difference, including any of the protected characteristics. Children have a basic right to live their lives free from abuse. They have a right to be safe in our School.

St. John’s Prep. & Senior School recognises and understands its statutory responsibilities to work together in partnership with other agencies to help children to grow up in a healthy and safe environment.

Staff at St. John’s are acutely aware that safeguarding, and promoting the welfare of children, is **everyone’s responsibility** and that they must **always consider what is in the best interests of the child**, at all times.

### Key terms

Safeguarding refers to the policy and procedures we implement to keep all pupils in our School safe.

Our School includes the Preparatory site (led by the Proprietor and Substantive Headteacher, known too as the Principal, Mrs. C. Tardios) and the Senior site (led by the Headteacher, Mr. A. Tardios).

Safeguarding and promoting the welfare of children 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
- taking action to enable all children to have the best outcomes.

Child Protection refers to the procedures we implement to protect pupils who are at risk of serious harm or have been seriously harmed.

This policy forms part of a suite of documents and policies, which relate to the safeguarding responsibilities of the School. In particular, this policy should be read in conjunction with the following St. John's policies and statutory guidance:

- behaviour and the [DfE's 'behaviour in schools' guidance](#)
- anti-bullying
- whistle-blowing
- online safety.

We recognise the following definitions.

- A child is anybody under 18 years old.
- A person in a position of trust is anyone who works regularly with children.

### **Key points**

- School staff are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children. Safeguarding concerns can arise anywhere and staff should be alert to possible concerns being raised in this School. Staff understand that pupils may not feel ready or know how to tell someone that they are being abused.
- All School staff receive at-least annual safeguarding and child protection training, so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. There are regular opportunities to discuss safeguarding in staff meetings and briefings to ensure staff are kept up-to-date. Staff who are new to the School receive safeguarding and child protection training as part of their induction to the School and staff are informed of how to raise concerns immediately. All staff must also read 'Keeping Children Safe in Education – information for all School and college staff' at induction and whenever it is issued when updated.
- Staff need to remember that relationships and associations that they have in school and outside of school (including online) may have an implication for the safeguarding of children in the school. If there is a change in their circumstances, the member of staff must speak to the Headteacher.
- We are committed to maintaining an environment where both children and staff feel secure, are encouraged to talk, and are listened to by trusted adults/colleagues when they have a worry or concern.
- Through the PSHCE curriculum we include relevant opportunities for pupils of all ages to develop the skills they need to recognise and stay safe from abuse, including online.

- In order to safeguard and promote the welfare of children, the School acts in accordance with a range of legislation and guidance, including the independent school standards, the latest version of '[Keeping children safe in education](#)', and the latest version of '[Working together to safeguard children](#)' and the local procedures established under the [Enfield-Safeguarding-Children-Partnership-Arrangements.pdf](#)
- This policy outlines the procedures our School has in place for responding to situations in which we believe that a child has been abused or is at risk of abuse - these procedures also cover circumstances in which a member of staff is accused of, or suspected of, abuse.
- Our staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of this environment.
- All staff, but especially our designated safeguarding lead (and deputies) always 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) online abuse, grooming, sexual exploitation, sharing nudes and semi-nudes, modern day slavery, trafficking or criminal exploitation and radicalisation, domestic abuse (which includes controlling and coercive behaviour) and serious youth violence.

### **St. John's Designated Safeguarding Lead (DSL) and Deputy DSLs**

- **Mrs. Virginie Hopp is the DSL. She is based at the Senior School.**
- There are a number of full-time, suitably-trained deputies.
- At the Senior School they are Mrs. Jacqui Li-Teterra and Mr. Alexander Tardios.
- At the Preparatory School they are Ms. Elizabeth Tardios and Mrs. Shirley Brandon. Mrs. Michelle Aylott is a Deputy for Early Years. Mrs. Jane Richardson and Mr. David Brandon are also part-time, suitably-trained deputies.
- The Principal, Mrs. Calliope Tardios, is also a suitably-trained deputy.
- Mrs. Anita Lonsdale is the school's designated safeguarding governor.

The DSL ensures that:

- they take **lead responsibility** for safeguarding and child protection, including online safety and the filtering and monitoring systems and processes in place
- staff are kept updated with regular refresher training and weekly updates, as necessary

- new staff receive a safeguarding induction **before** they commence working with pupils
- they work together with our local safeguarding partners as per [Enfield-Safeguarding-Children-Partnership-Arrangements.pdf](#)
- the appropriate decisions regarding the level of response to specific concerns are made in a timely and effective way
- liaise and work with social care teams and the police as necessary
- meticulous safeguarding records relating to individual pupils are kept separately and securely and are passed on securely should the child transfer to a new provision with a confirmation of receipt obtained
- they attend meetings and child protection conferences – or send reports where this is not possible – for pupils with social care services involvement
- the School effectively monitors pupils, about whom there are concerns, including notifying social care services when there is any unexplained absence for a pupil who is the subject of a child protection plan
- a training record showing the dates and types of safeguarding and child protection training undertaken by every member of staff at the School, regardless of role, is up-to-date and accurate.

### **School procedures - staff responsibilities**

- If any member of staff is concerned about a child, he or she must inform the DSL or a Deputy, promptly. Staff should not explore or investigate concerns themselves.
- The member of staff must record information regarding the concerns, including verbal conversations, on the same day, using the school's online safeguarding system. The recording must be a clear, precise, factual account of the observations.
- The DSL or Deputy will decide whether the concerns should be referred to social care services. If they are, this will be done following a discussion with the parents, unless to do so would place the child at further risk of harm.
- Particular attention will be paid to the attendance and development of any child about whom the School has concerns, or who has been identified as being the subject of social care services involvement and especially a child protection plan.
- In exceptional circumstances, such as in an emergency or genuine concern that appropriate action has not been taken, staff members may refer directly to social care services.

- Where there are concerns about the way that safeguarding is carried out, staff should refer to our whistleblowing policy.

### **Staff training**

- All staff in the School will undertake regular updates, and full annual training, to ensure they are competent to carry out their responsibilities. Training enables all staff to be able to recognise the signs and symptoms of abuse and neglect. It includes ensuring staff understand their roles and responsibilities in relation to our arrangements for filtering and monitoring on school devices and networks.
- A weekly update from safeguarding specialist Andrew Hall – detailing any new regulations or items of interest in relation to safeguarding issues – is sent to all staff via email.
- New members of staff are given a mandatory induction, which includes familiarisation with all St. John's core policies, including this one.
- The DSL and Deputies undertake enhanced training at least every two years and take other opportunities to update their knowledge regularly.
- Staff involved in recruiting new staff complete safer-recruitment training before they may do so.

### **Vulnerable pupils, including those with SEND**

- We acknowledge that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEN and disabilities have a higher risk of being left out, of being isolated from their peers and can be disproportionately impacted by things like bullying - without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.
- The school has a strong commitment to our anti-bullying strategy and will consider all coercive acts and child-on-child abuse within a safeguarding context. We recognise that some pupils will sometimes negatively affect the learning and well-being of other pupils and their behaviour will be dealt with under the School's behaviour policy, which reflects [DfE guidance](#).
- We minimise the risk of allegations against other pupils by providing a developmentally appropriate SMSC/PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on

assertiveness and keeping safe to those pupils identified as being at greater risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. We also use a 'playground buddy' system to help children finding break times difficult.

- Some pupils may not feel ready or know how to tell someone that they are being abused. We will always ascertain the views and feelings of all pupils. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children.
- There are links to further information and guidance at paragraph 202 on page 50 of the latest '[Keeping Children Safe in Education](#)' (September, 2023) statutory guidance.

### **Lesbian, gay, bisexual and trans (LGBT) pupils**

- Being LGBT is not in itself an inherent risk factor of harm, however pupils may be at risk of being targeting by other pupils. It is, therefore, essential that all pupils have a trusted adult that they can approach and talk to if necessary. Trusted adults aim to reduce the additional barriers faced by these pupils by providing a safe space for them to talk or share any concerns that they have.

### **When to be concerned**

All staff should be aware that the main categories of abuse are:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Domestic abuse (including controlling and coercive behaviour)

Some general signs that *may* suggest abuse include children:

- appearing frightened of the parent/s or other household members
- acting in a way that is inappropriate to her/his age and development
- displaying insufficient sense of 'boundaries'; lacking awareness of strangers
- appearing wary of adults and displaying 'frozen watchfulness'
- having poor attendance to school
- significant changes in behaviour and/or decline in performance
- signs of self-harm, assault or unexplained injuries.

## **Dealing with disclosures**

If a child makes a disclosure, the staff member must:

1. Listen to what is being said without displaying shock or disbelief.
2. Accept what is being said.
3. Allow the child to talk freely.
4. Reassure the child.
5. Not promise confidentiality — it will be necessary to pass the information on.
6. Reassure him or her that what has happened is not their fault.
7. Stress that it was the right thing to tell.
8. Listen, only asking questions when necessary to clarify.
9. Not criticise the alleged perpetrator.
10. Explain what has to be done next and who has to be told.
11. Make a report on the school's online reporting system without delay.

Dealing with disclosures and safeguarding issues can be stressful. Staff may consider seeking support via the DSL or a Deputy.

## **Confidentiality**

Safeguarding children raises issues of confidentiality that must be clearly understood.

- All staff in schools have a responsibility to share relevant information about the protection of children with other professionals.
- If a refusal to maintain confidentiality leads to a child refusing to disclose, they should be offered alternative ways to share the concerns, for example, by giving the name of someone else they could talk to or sharing the details for Child Line ([www.childline.org.uk](http://www.childline.org.uk) 0800 1111) or the NSPCC dedicated helpline to support anyone who has experienced sexual abuse in educational settings. The dedicated NSPCC helpline number is 0800 136 663. Do not leave the child thinking there is no-one to talk to. Reassure the child they can always come back and talk to you at another time.

## **Communication with parents and carers**

As a School we:

- undertake appropriate discussion with parents prior to involvement of another agency unless to do so would place the child at further risk of harm
- ensure that parents have an understanding of the responsibilities placed on the School and staff for safeguarding children
- ensure that parents are aware that a copy of this policy and all policies required by the independent school standards can be found on our website.



## **Sharing information**

- When considering sharing information, the School ensures that the information shared is necessary for the purpose in which it is being shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe – this includes allowing practitioners to share information without consent, provided there is a lawful basis to process any personal information required.
- On leaving St. John's, in addition to the secure sharing of the pupil's child protection file with the destination institution, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

## **Record keeping**

When a child has made a disclosure, the member of staff should:

- make brief notes as soon as possible after the conversation: use the School record of concern sheet wherever possible
- include full names and roles
- do not destroy any original notes made
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- draw a diagram to indicate the position of any injuries, if applicable – photographs of injuries must not be taken
- record statements, observations and facts rather than interpretations, assumptions or opinions
- sign, date and time the written notes and hand them in their entirety to the DSL or a Deputy.

## **Online safety, including filtering and monitoring**

- St. John's filtering and monitoring system blocks harmful and inappropriate content without unreasonably impacting teaching and learning; and it monitors pupils' online use in order to alert leaders to potential safeguarding concerns.
- All staff have a role to play in ensuring any concerns regarding the system's effectiveness are relayed without delay to the DSL and the computing lead, David Brandon. Please see our separate online-safety policy.

## Governance

The Education (Independent School Standards) Regulations apply a duty to proprietors of independent schools to ensure that arrangements are made to safeguard and promote the welfare of children.

The proprietor, with support from external experts on the Schools' Advisory Board, ensures that they comply with their duties under legislation and fulfils their duty to remedy any weaknesses that are identified.

The proprietor, and all advisory board members commissioned to provide external and impartial support, guidance and scrutiny, know that their timely and regularly updated completion of an advanced level of safeguarding and child protection training is crucial in keeping fully aware of the latest statutory guidance.

The proprietor's duties and responsibilities include ensuring that:

- policies and procedures are effective and comply with the law
- high-quality training is provided to all staff, at all levels. This includes induction training, annual whole school safeguarding training, and regular safeguarding training throughout the year
- all staff have read and understood this policy and part one of the 'Keeping Children Safe in Education' (September, 2023) statutory guidance
- a member of the senior leadership team has been appointed to the role of Designated Safeguarding Lead (DSL). This person has overall responsibility for safeguarding and child protection across the School's two sites. The proprietor is responsible for monitoring the DSL and holding them to account
- the DSL will continually monitor our child protection and safeguarding practices and bring to the notice of the proprietor any weaknesses or deficiencies
- the school contributes to multi-agency working in line with statutory guidance 'Working Together to Safeguard Children', working very closely with external agencies such as social care services, the police and health services to promote the welfare of pupils, and to protect them from harm
- positive relationships are built with all of our parents and carers, and appropriate support is put in place
- appropriate and proportionate filters and monitoring systems are in place to ensure that pupils are safeguarded from potentially harmful and inappropriate material; and leaders are alerted to online use that may identify a safeguarding concern. The system's effectiveness is reviewed at least annually with the school's computing lead, David Brandon, who manages the

school's filtering and monitoring system. He works in partnership with the proprietor in acknowledgement of the [DfE's Harmful online challenges and online hoaxes](#) guidance and to ensure that the '[Filtering and monitoring standards for schools and colleges](#)' guidance is met in full.

- pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- obligations are fully understood and fulfilled under the Human Rights Act 1998, the Equality Act 2010 and Enfield's multi-agency safeguarding arrangements
- the experiences of the staff team are taken into account when shaping this policy, providing regular opportunities for staff to contribute to and shape the School's safeguarding policy, procedures and culture.

## **PART TWO**

### **Allegations against staff, including 'low-level' concerns**

This section concerns situations where it is suspected or alleged that a member of staff at the School has:

- 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 he or she would pose a risk of harm if they work regularly or closely with children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations of abuse against staff are dealt with thoroughly and efficiently, maintaining the highest level of protection for the child whilst also giving support to the person who is the subject of the allegation. The procedures for dealing with allegations (below) should be applied with common sense. However, it is important that even 'lower-level' concerns that appear less serious and do not meet the 'harms threshold' are shared with the DSL, recorded and followed-up appropriately.

### **Reporting an allegation**

- All concerns of poor practice or possible child abuse by staff should be reported immediately to the Principal or Headteacher, who will, in turn, immediately inform the [Local Authority Designated Officer](#) (LADO).
- Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount and must report their concerns immediately.

The LADO and the Principal or Headteacher will discuss the nature, content and context of the allegation and agree a course of action to decide whether:

- no further actions are required
- a strategy meeting should take place
- there should be immediate involvement of the police and/or social care services.

### **Investigation**

- An investigation into the allegations may be carried out by the LADO or by the School. This will be agreed at the initial evaluation stage. Where the School is not conducting the investigation it will cooperate fully.

## **Supporting those involved**

### **If applicable, the pupil(s) who have made the allegation and their parents/carers**

- Parents and carers will be notified if their child makes or is involved in an allegation against staff if they do not already know. However, if the police or social care services are to be involved, they will be contacted first and will advise as to what information may or may not be disclosed to the parents.
- Parents and carers will be made aware of any progress in the investigation, and where there is no criminal prosecution, the outcome will be explained to them.
- All possible support that can be provided to the pupil, will be, in consultation with the police and/or social care services, where applicable.

### **The employee**

- The person who is the subject of the investigation will be informed by the Principal or Headteacher as soon as the allegation has been made. The employee will then be advised on what the next course of action will be. However, if the Police or Social Services are to be involved, they will be contacted before the employee and will advise as to what information may be disclosed to the person under investigation.
- If the School needs to suspend the employee on full pay pending the outcome of the investigation, a named contact will be provided and the colleague will be reminded that this implies no guilt.
- The allegation will be dealt with as quickly as possible, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.
- The Principal or Headteacher will keep the subject of the allegation informed of the progress of the case and any other work-related issues. If that person has been suspended, they will keep them informed of any developments from School.
- The employee may need additional support and the School should consider what might be appropriate to best accommodate this. If it is a criminal investigation and the police are involved, they may provide this additional support.

### **Confidentiality**

- The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to

maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of someone, who is the subject of an allegation before they are charged.
- Legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of a teacher who is the subject of the allegation is prohibited. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).
- No information will be given to the media by anybody at St. John’s.

## Resignations

- If an employee hands in their resignation when the allegation is made against them or during an investigation, the investigation will still continue until an outcome has been reached, with or without the person’s cooperation. They will be given full opportunity to answer the allegation.
- It is not appropriate to use compromise agreements in situations which are relevant to these procedures.

## Record keeping

- Except in those cases which have been found to be malicious, detailed records of all allegations made, investigations and outcomes will be kept, including for people who leave the organisation, at least until the person reaches normal retirement age or for 10 years if that will be longer, from the date of the allegation.
- Allegations that are proven to be false, unsubstantiated, malicious or unfounded will not be referred to in employee references.

## Action on conclusion of the case

The following definitions are used when determining the outcome of 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 to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded;** no evidence to prove the allegation is found.

## **Duty to refer to the Disclosure and Barring Service (DBS)**

- St. John's acknowledges its legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals are made as soon as possible after the resignation or removal of the individual.

## **In respect of malicious or unsubstantiated allegations**

- If an allegation is determined to be unsubstantiated, malicious or false, the LADO and/or police will advise on next steps.
- If an allegation is found to be intentionally factitious and malicious, the Principal or Headteacher will decide what the appropriate sanction will be for the pupil who made the false allegation, as per the School's behaviour policy.
- If the claim has been made by a person who is not a pupil, the School will refer to the police who may take further action against that person.

## **After the case**

- No matter what the outcome is of an allegation of abuse against staff, the School will review the case to see if there are any improvements that can be made in its practice or policy that may help to prevent similar cases in the future.

## **Allegations concerning external users of St. John's premises**

- Allegations may arise that relate to incidents involving external individuals and/or organisations using our school premises for the purposes of running activities for pupils (such as our sports and extra-curricular service providers).
- In this scenario, the same procedure for managing allegations against staff applies, including informing the [Local Authority Designated Officer](#), if appropriate.

## **Allegations concerning the sole proprietor**

- Allegations involving the proprietor (who is also the substantive headteacher, known as the Principal) of the School (Mrs. C. Tardios) should be taken directly to the [Local Authority Designated Officer](#).

## **‘Low-level’ concerns**

At St. John’s, we do all we can to facilitate an open and transparent culture in which we take **all** concerns about **any** adults working in or on behalf of the school seriously. These include any concerns that may be considered ‘low-level’ – which are any concerns no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of our school may have acted in a way that:

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

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

We are committed to:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level concerns
- addressing unprofessional behaviour and supporting individuals to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised
- helping identify any weakness in the school’s safeguarding systems.

**Low-level concerns must be shared initially with a Deputy DSL and/or, or then ultimately with, the DSL.** The DSL will always inform the principal of all low-level concerns in a timely fashion according to the nature of each particular concern. Though statutory guidance states that the principal should be the ultimate decision maker in respect of all low-level concerns, St. John’s adopts, wherever possible, realistic and appropriate, a collaborative decision-making approach. If the DSL is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with the LADO.



The DSL will notify employers about any low-level concerns which are shared about external staff (such as temporary staff from an agency) and contractors, so that any potential patterns of inappropriate behaviour can be identified.

We encourage all adults working at or with St. John's to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

**As with all concerns, all low-level concerns must be recorded in writing on our secure online safeguarding system.** Records will be reviewed by the DSL and safeguarding team so that potential patterns of inappropriate, problematic or concerning behaviours can be identified. Where a pattern of behaviour is identified, the DSL and principal will decide together on a course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it will be referred to the LADO.

On receipt of a low-level concern, the DSL/principal (and/or a DDSL) will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded on the secure online safeguarding system, along with the rationale for decision-making and any action taken.

Information about low-level concerns will be retained until at least the adult concerned leaves employment at, or their involvement with, St. John's.

Low-level concerns will not be included in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

## **PART THREE**

### **Key areas of concern to be aware of and alert to**

- **Concerns about any pupil in relation to any of the issues identified below must be reported to the DSL or a Deputy as quickly as possible.**

**Allegations from pupils against other pupils, including child-on-child (also previously known as 'peer on peer') abuse, sexual harassment, sexual violence and 'upskirting'**

Child-on-child abuse may include:

- physical abuse (violence, particularly pre-planned, forcing other children to use drugs or alcohol)
- emotional abuse (blackmail or extortion, threats and intimidation)
- sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting)
- sexual exploitation - encouraging other children to engage in inappropriate sexual behaviour, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts
- upskirting, which typically involves taking a picture under a person's clothing to take a voyeuristic photograph 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. It is a criminal offence. Anyone of any gender can be a victim.

St. John's staff know the importance of challenging inappropriate behaviours between peers and know never to downplay certain behaviours as "banter" or "part of growing up" as it can normalise violent and abusive behaviours.

Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. We know that girls are more likely to be victims of abuse and boys are more likely to be perpetrators, however any allegations will be taken seriously as we have a **zero-tolerance approach to any form of harassment, abuse and/or violence.**

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern, and refer it to the DSL or a Deputy as quickly as possible.

If there *is* a safeguarding concern:

- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate
- The DSL will contact social care services to discuss the case. It is possible that social care services are already aware of safeguarding concerns around the pupil. The DSL will follow through the outcomes of the discussion and make a social care services referral where appropriate
- The DSL will make a record of the concern, the discussion and any outcome and retain this in the pupil's safeguarding file
- If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim)

- It may be appropriate to exclude the pupil being complained about for a period of time, as per our behaviour and anti-bullying policies
- Where neither social care services nor the police accept the complaint, a thorough internal school investigation will take place in any case
- In situations where the DSL considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan which will be monitored and evaluated with all adults working with the pupil.
- Both the victim(s) and perpetrator(s) will be supported by the school. What this looks like may vary depending on the case, however it may include additional support and/or ongoing communication with external agencies.

### **Sexual violence and harassment**

- Sexual violence and harassment may occur between children of any age and sex. It may occur through a single child or group of children sexually harassing or being sexually violent towards another child or group of children; it may happen both physically or verbally, online or offline. It can take many different forms; inappropriate sexual play, harmful sexual behaviour, sexting, grooming etc.
- St. John's staff are continuously advised to maintain an attitude of '**it could happen here**' and to '**think the unthinkable**' as we have a **zero-tolerance approach to sexual violence and sexual harassment**.
- Ofsted's 2021 review of sexual abuse in schools and colleges revealed how prevalent sexual harassment and online abuse are for children, especially in independent schools.
- We are aware that children with special educational needs and/or disabilities (SEND) are three times more likely to be abused than their peers.
- Staff will always address inappropriate behaviour as it can be an important intervention that helps prevent abusive and/or violent behaviour in the future.
- There is a range of resources available to help schools support pupils, parents, carers and staff on pages 110 to 111 of the latest 'Keeping Children Safe in Education' (September, 2023) guidance.

**Sexual harassment** includes behaviours such as:

- Sexual comments, lewd comments, telling sexual stories
- Sexual jokes or taunting
- Physical acts, such as deliberately brushing against someone or interfering with their clothes
- Displaying sexual pictures, photos or drawings of a sexual nature

- Online sexual harassment, such as sharing sexual images/videos (sexting), inappropriate sexual comments on social media, exploitation, coercion and threats
- Sharing unwanted explicit content
- Upskirting
- Sexualised online bullying.

If not challenged, sexual harassment can normalise inappropriate behaviours and create a culture that may lead to sexual violence.

**Sexual violence**, as per the Sexual Offences Act 2003, can be defined as:

- Rape - intentional penetration by a male of the vagina, anus or mouth using a body part or other item, if the person being penetrated does not consent and the person penetrating does not reasonably believe that they consent
- Assault by penetration – intentional penetration by person of the vagina or anus using a body part or other item, if the person being penetrated does not consent and the person penetrating does not reasonably believe that they consent
- Sexual assault – intentionally touching another person in a sexual way if the person being touched does not consent and the person touching does not reasonably believe that they consent. Sexual assault covers a wide range of behaviours, an act of a single kiss to someone who does not consent or touching someone’s genitalia without consent can still constitute sexual assault.
- Causing someone to engage in sexual activity without consent – if a person intentionally causes another person to engage in an activity, the activity being sexual, that they did not consent to. This could include forcing someone to strip, touch themselves or engage in sexual activity with a third party.

The Sexual Offences Act 2003 states that the age of consent is 16 years of age. Consent is only given freely by someone who has the capacity to make that choice. Consent to one sexual act does not imply consent to another and consent can be withdrawn at any time. Sexual intercourse without consent is rape. Children under the age of 13 years of age cannot consent to sex.

Characteristics of healthy sexual behaviour include:

- A mutual interaction
- Consensual
- Exploratory, age-appropriate behaviour
- No intent to cause harm
- Fun and humorous
- No power differential between participants

Whilst characteristics of problematic sexual behaviour include:

- Behaviours that are not age appropriate e.g. young children using sexual swear words
- Some 'one off' low-level incidents of low-key behaviour e.g. touching over clothing
- Behaviours driven by peer pressure
- Where there are other balancing factors such as a lack of intent to cause harm, or a lack of understanding in the young person and the behaviours, or there is some remorse
- The targeted child may feel aggrieved with the behaviour but does not feel scared, and feels free to tell someone.

Characteristics of harmful sexual behaviour include:

- Behaviours which are not age or developmentally appropriate
- Power differentials between young people such as age, size status and strength
- Elements of planning, secrecy or force
- Incidents increase in frequency and the young person's interest in them is disproportionate to other aspects of their life
- Where the young person does not take responsibility for the behaviour and blames others or feels a strong sense of grievance
- The targeted child feels fearful, anxious and/or distressed.

Evidence suggests that girls, children with SEND and LGBT children are at greater risk. It is important that all disclosures are taken seriously and never considered as 'banter'. Victims must be supported and there is always a clear message that it is never acceptable. It is important to consider that children who are displaying harmful sexual behaviours have often experienced their own abuse and trauma and it is essential that they are offered appropriate support.

Any experience of sexual violence and sexual harassment is likely to have a significant impact on a pupil's emotional well-being and adversely affect their educational attainment.

### **Managing incidents of sexual violence and harassment**

- Pupils may not be able to tell staff about their abuse verbally; they may try to alert staff by showing signs or acting in a certain way, or it may be overheard or a third-party disclosure.
- Staff need to be mindful that the initial response to a report from a pupil is very important as it can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.
- However, the starting point of any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment: it is never acceptable and it will never be tolerated. We remind staff to '**see it, hear it, believe it, do something**'.

- Staff must listen carefully, share any concerns about a pupil to the DSL and complete a factual report using the school's online reporting system without delay.
- The DSL will consider:
  - a) the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should 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. This will however need to be balanced with our duties and responsibilities to protect other children
  - b) the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
  - c) the ages of the children involved and their developmental stages
  - d) any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
  - e) if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
  - f) that sexual violence and sexual harassment can take place within intimate personal relationships between children
  - g) importance of understanding intra familial harms and any necessary support for siblings following incidents
  - h) are there ongoing risks to the victim, other children, adult students or school or college staff?
  - i) other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- As always when concerned about the welfare of our pupils, staff always act in the best interests of the pupil. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted). An investigation and any necessary action will be taken in conjunction with this policy, as well as our anti-bullying and behaviour policies.
- If a pupil is at risk of harm, is in immediate danger or has been harmed, a referral should be made to social care services; and as rape, assault by penetration and sexual assaults are crimes, a referral to the police will be made.

- In most instances, both the victim's and the alleged perpetrator's parents will be informed, unless there is reason to believe that informing them will put a pupil at additional risk. Usually the alleged perpetrator(s) will be informed after the DSL seeks advice on next steps from the relevant agency, however immediate action should be taken if needed to safeguard other pupils.
- An immediate risk assessment will be carried out in order to establish what protection and support is needed for those involved. Usually, the incident will either be handled internally, referred to early help, referred to children's social care services and the police.
- Whatever the required response may be, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment.
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of St. John's will not be downplayed and will be treated equally seriously. A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important that staff explain that the law is in place to protect pupils rather than criminalise them, and this must always be explained in such a way that avoids alarming or distressing them.
- If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the pupil who made the allegation needs additional support or may have been abused by someone else. In such circumstances, a referral to children's social care services may be appropriate. Alternatively, disciplinary action may be appropriate against the individual who made it as per the behaviour policy.
- As a school, we are one of the 'relevant agencies' and so contribute to the discussions with our statutory safeguarding partners in Enfield. [Enfield's threshold document is here.](#)

The NSPCC has set up a dedicated helpline to support anyone who has experienced sexual abuse in educational settings – 0800 136 663.

### **Sharing nudes and semi-nudes**

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex.

Sharing could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works

offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The content may include more than one child or young person.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer;
- children and young people digitally manipulate an image of a young person into an existing nude online;
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

If an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting the following applies:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or a Deputy).
- The incident should be referred to the DSL (or Deputy) as soon as possible, who will then follow the guidelines set out in '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'.

## **Contextual safeguarding**



- This is an approach to understanding, and responding to, pupils' experiences of harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature, as examples, violence and abuse.
- Contextual safeguarding seeks to understand child protection risks from beyond the family. This becomes of increasing importance for teenagers who naturally begin to spend more time out of their home and under the influence of their peers. Research shows us that teenagers are influenced more by their peers and wider relationships than their parents and the pervading attitudes and social norms of their social group may be positive or negative.
- These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking; online abuse; teenage relationship abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered. A safe, supportive, and effective peer group will engender positive relationships, whilst negative experiences may lead to violent, coercive, and harmful behaviours.
- St. John's staff are aware that safeguarding incidents and/or behaviours may be a result of factors outside of the school and outside of the family home e.g. in the community, peer groups, extended family members. All staff, but especially the designated safeguarding lead (and deputies) are aware that issues such as mental health, child criminal exploitation (CCE), child sexual exploitation (CSE), gang culture, serious crime and peer-on-peer abuse can have an adverse impact on children and young people. It is imperative that staff recognise the signs of abuse and act quickly to safeguard the child.

### **Child sexual exploitation (CSE)**

- CSE is a form of child sexual abuse. It can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention/affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship, to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The perpetrator (or perpetrators) always hold some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops.
- 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).
- Indicators of CSE includes children who have older boyfriends or girlfriends; and children who suffer from sexually transmitted infections or become pregnant.
- At St. John's, we attempt to identify children and young people who are vulnerable to, or at risk of, sexual exploitation and who need services and interventions to keep them safe. Staff must always alert the DSL to any concerns around CSE. We pass on any information about CSE issues affecting the school, for example concerns about adults loitering near the school, to the police.

### **Child criminal exploitation (CCE) including gangs, 'county lines' and serious violence**

- 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, forced to shoplift or pickpocket, or to threaten other young people).
- Indicators of CCE include children who: appear with unexplained gifts or new possessions; associate with other young people involved in exploitation; suffer from changes in emotional well-being; misuse drugs and alcohol; go missing for periods of time or regularly come home late; and regularly miss school or education or do not take part in education.
- Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

### **Child criminal exploitation (CCE): ‘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”. County line enterprises almost always involve exploitation of vulnerable people: this could involve both children and adults and is always a safeguarding issue.
- 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, serious 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.
- 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.
- Indicators of county lines exploitation include children persistently going missing from school or home; unexplained acquisition of money, clothes, or mobile phones; excessive receipt of texts/phonecalls on more than one phone; relationships with controlling / older individuals or groups and the carrying of weapons.
- For further information, see the [County Lines Toolkit for Professionals](#).

### **Children absent from education**

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- We monitor attendance carefully and will address poor or irregular attendance without delay (see our attendance policy for further details).

- We ensure that we have at least two emergency contacts for each child on record and have a robust 'same-day calling' system for following-up unreported absence, including making home visits where necessary.
- The key reason we consistently respond pro-actively when pupils become persistently absent is to help prevent the risk of them becoming a **child missing education** (below) in the future.
- As per government guidance, '[Working together to improve school attendance](#)', we will refer to, and work with, Enfield children's services where a pupil's absence indicates safeguarding concerns.

### **Children missing education (CME)**

- Missing school can be an indicator of abuse and neglect and, particularly in older children, may raise concerns about CSE.
- We inform the local authority of any pupil who fails to attend school 'regularly' or does not attend school for 10 consecutive days without authorisation. We provide all the required information when removing a child from our school roll at both standard and non-standard transition points in line with the '[Children Missing Education](#)' statutory guidance.
- Where pupils who are expected to attend St. John's fail to take up their place, we refer this to the local authority. Pupils who leave St John's without providing a verifiable destination are also referred. When a pupil leaves the school, we record the full details of the pupil's new school and their expected start date, and verify these details.

### **'Honour-based' abuse (HBA) and forced marriage**

- So-called 'honour-based abuse' (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and will be handled and escalated as such.
- 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 are used to cause a person to enter into the marriage. Threats can be physical or emotional and psychological. Some perpetrators use perceived cultural practices to coerce a person into marriage. 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.

- Guidelines from the Forced Marriage Unit (FMU) can both be found at '[The right to choose: government guidance on forced marriage](#)' and further advice or information are available at 020 7008 0151 and [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk). A range of further guidance can also be found in Annex B of the latest 'Keeping children safe in education' (September, 2023).

### **Domestic abuse, including teenage relationship abuse**

Domestic abuse can be defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own relationships (teenage relationship abuse).

The current UK definition of domestic violence includes incidences between people aged 16 or over, but it is important to note that violence and abuse can occur in relationships between children and young people at any age.

School staff will look out for the signs of domestic abuse, including relationship abuse and educate children about what healthy relationships look like and what abusive relationships are.

Where concerns exist that a pupil may be at risk of domestic abuse or experiencing relationship abuse, the DSL will be informed as soon as possible and the concern will be logged. The DSL will alert the relevant agencies and work with other professionals in order to safeguard the child concerned.

Staff are also aware that Refuge runs a national domestic abuse helpline (0808 2000 247) which provides guidance and support for potential victims, as well as those who are worried about others.

### **Operation Encompass**

- Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (the DSL) in school before the pupil arrives at school the following day. This ensures that the school has up to date relevant information about the child's

circumstances and can enable immediate support to be put in place, according to the child's needs.

- Operation Encompass does not replace statutory safeguarding procedures. (Referrals must always be made to local authority children's social care services; they cannot be made to Operation Encompass).
- See the [Operation Encompass website](#) for more information.
- Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8.00 a.m. to 1.00 p.m., Monday to Friday on 0204 513 9990.

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

- Female Genital Mutilation (FGM) is a collective term for a range of procedures which involve partial or total removal of the external female genitalia for non-medical reasons. Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened the law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.
- Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone. Indicators may include difficulty walking, sitting or standing; spending a longer period of time in the bathroom; displaying unusual behaviour after being long unexplained absences.
- The FGM Duty requires any teacher discovers through disclosure that FGM has been carried out on a girl under 18 in the school, they must report this directly to the police. However, the teacher should also inform the Designated Safeguarding Lead, unless they have a good reason not to do so.

### **Children potentially at greater risk of harm**

#### **Children looked after (CLA)**

- The most common reason for children becoming looked after is as a result of abuse and/or neglect.
- Children looked after potentially remain vulnerable; it is essential that prompt action is taken when necessary to safeguard this group of children. The DSL will have details of any CLA's social worker and their history.

- In the rare event of a CLA attending St. John's, the DSL will work closely with the carers and virtual school head, in full knowledge of the guidance outlined on pages 47 to 49 in 'Keeping Children Safe in Education' (September 2023).

### **Children with support from a social worker (including those on Child 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.
- Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Children with mental health needs**

- Schools have an important role to play in supporting the mental health and well-being of their pupils. 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.
- Staff, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

### **Private fostering**

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

- There is a mandatory duty on schools to inform the local authority if we become aware of a child in such arrangements.

### **Radicalisation, extremism and the Prevent Duty**

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this. There is no place for extremist views of any kind in our School – our pupils see our School as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this — we have a duty to ensure this happens.
- There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
- 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.

Indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others



- verbalising anti-Western or anti-British views
- advocating violence towards others.
- The Prevent Duty requires St. John's to support the national effort to prevent people being drawn into terrorism. Prevent referrals from schools may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the School may be asked to attend the Channel panel to help with this assessment.
- Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and where appropriate dealt with in line with the appropriate policies.
- Visiting speakers are thoroughly vetted, risk-assessed before, and supervised during, speaking at St. John's.
- DSLs and Deputies have received Prevent Duty training and are able to support staff with any concerns they may have.
- As ever, any staff member concerned that pupils may be developing extremist views or showing signs of becoming radicalised, they should always discuss this as quickly as possible with their DSL or Deputy.

### **Pupils' online access outside of school, including remote education**

- Teachers are in regular contact with parents and carers. These communications are used, as necessary, to reinforce the importance of keeping their children safe online.
- After the COVID-19 pandemic, we hope we will not have to provide remote education again. However, we are ready to do so, in line with the NSPCC's helpful advice - [Undertaking remote teaching safely](#). We acknowledge that parents and carers are likely to find it helpful to understand what systems we use at St. John's to filter and monitor online use. Teachers will always ensure that parents and carers are aware of what their children are being asked to do online, including the sites they will be asked to access and who their child is going to be interacting with online.

## **PART FOUR**

### **Indicators of harm for the most common forms of abuse**

#### **Physical abuse**

Physical abuse 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.

#### *Indicators in the child*

#### **Bruising**

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Bruising in or around the mouth
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can also be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Linear bruising at any site, particularly on the buttocks, back or face
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks to the upper arms, forearms or leg
- Petechiae haemorrhages (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing

#### **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress.

If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.

Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.

Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.

### **Mouth Injuries**

Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

### **Poisoning**

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children.

### **Fabricated or Induced Illness**

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- Discrepancies between reported and observed medical conditions, such as the incidence of fits
- Attendance at various hospitals, in different geographical areas
- Development of feeding / eating disorders, as a result of unpleasant feeding interactions
- The child developing abnormal attitudes to their own health
- Nonorganic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause
- Speech, language or motor developmental delays
- Dislike of close physical contact
- Attachment disorders
- Low self esteem
- Poor quality or no relationships with peers because social interactions are restricted
- Poor attendance at School and under-achievement

### **Bite marks**

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

## **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid.

Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in.
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet.
- A child getting into too hot water of his or her own accord will struggle to get out and there will be splash marks

## **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

- Emotional/behavioural presentation
- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted and fear of returning home
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of medical help
- Aggression towards others
- Frequently absent from School
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

### *Indicators in the parent*

- May have injuries themselves that suggest domestic violence
- Not seeking medical help/unexplained delay in seeking treatment
- Reluctant to give information or mention previous injuries
- Absent without good reason when their child is presented for treatment
- Disinterested or undisturbed by accident or injury

- Aggressive towards child or others
- Unauthorised attempts to administer medication
- Tries to draw the child into their own illness.
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids
- Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care.
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child
- Wider parenting difficulties may (or may not) be associated with this form of abuse.
- Parent/carer has convictions for violent crimes.

#### *Indicators in the family/environment*

- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the 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, though it may occur alone.

#### *Indicators in the child*

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others

- Child scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' - difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Anxiety behaviours (e.g. rocking, hair twisting, thumb sucking)
- Self-harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Low self-esteem
- Air of detachment — 'don't care' attitude
- Social isolation — does not join in and has few friends
- Depression, withdrawal
- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
- Low self-esteem, lack of confidence, fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour

#### *Indicators in the parent*

- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse.
- Abnormal attachment to child e.g. overly anxious or disinterest in the child  
Scapegoats one child in the family
- Imposes inappropriate expectations on the child e.g. prevents the child's developmental exploration or learning, or normal social interaction through overprotection.
- Wider parenting difficulties may (or may not) be associated with this form of abuse.
- Indicators of in the family/environment
- Lack of support from family or social network.
- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

#### **Neglect**

Neglect is 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 caregivers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### *Indicators in the child*

#### **Physical presentation**

Failure to thrive or, in older children, short stature.

- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
- Swollen limbs with sores that are slow to heal, usually associated with cold injury
- Abnormal voracious appetite
- Dry, sparse hair
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea
- Unmanaged / untreated health / medical conditions including poor dental health
- Frequent accidents or injuries
- General developmental delay, especially speech and language delay
- Inadequate social skills and poor socialization

#### **Emotional/behavioural presentation**

- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at School
- Poor self esteem
- Destructive tendencies
- Thrives away from home environment
- Aggressive and impulsive behaviour

- Disturbed peer relationships
- Self-harming behaviour
- Indicators in the parent
- Dirty, unkempt presentation
- Inadequately clothed
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child e.g. anxious
- Low self-esteem and lack of confidence
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties, may (or may not) be associated with this form of abuse

#### *Indicators in the family/environment*

- History of neglect in the family
- Family marginalised or isolated by the community
- Family has history of mental health, alcohol or drug misuse or domestic violence. History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Family has a past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for child to play and learn

### **Sexual abuse**

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) or the sharing nudes and semi-nudes by sending or posting images via live streams or videos.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

It should be remembered that all pupils are at risk of sexual abuse by their use of the internet. Our approach to online safety helps pupils understand all internet risks.

#### *Indicators in the child*

- Physical presentation
- Urinary infections, bleeding or soreness in the genital or anal areas
- Recurrent pain on passing urine or faeces
- Blood on underclothes
- Sexually transmitted infections
- Vaginal soreness or bleeding
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

#### **Emotional/behavioural presentation**

- Makes a disclosure.
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Self-harm - eating disorders, self-mutilation and suicide attempts
- Poor self-image, self-harm, self-hatred
- Reluctant to undress for PE
- Running away from home
- Poor attention / concentration (world of their own)
- Sudden changes in School work habits, become truant
- Withdrawal, isolation or excessive worrying
- Inappropriate sexualised conduct
- Sexually exploited or indiscriminate choice of sexual partners
- Wetting or other regressive behaviours e.g. thumb sucking
- Draws sexually explicit pictures
- Depression

#### *Indicators in the parents*

- Comments made by the parent/carer about the child.
- Lack of sexual boundaries
- Wider parenting difficulties or vulnerabilities, may (or may not) be associated with this form of abuse

- Grooming behaviour
- Parent is a sex offender
- Indicators in the family/environment
- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Family member is a sex offender.

DfE has also worked with the NSPCC to set up a dedicated helpline to support anyone who has experienced sexual abuse in educational settings. The dedicated NSPCC helpline number is 0800 136 663.

The CSA Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help us identify and respond appropriately to concerns of child sexual abuse: [Supporting practice in tackling child sexual abuse](#)

## **PART FIVE**

### **Safer recruitment of staff**

At St. John's Prep. & Senior School we do all we can to ensure that all those working with pupils in our School are suitable. We follow the guidance set out in the latest ['Keeping Children Safe in Education'](#).

We make use of the DBS Update Service for all staff. This enables us to quickly check the status of staff coming to work at the School (where the person is registered for the service and gives permission for it to be checked) and it is a requirement that all staff are enrolled.

### **Recruitment procedure**

1. Our commitment to safeguarding is outlined in all our vacancies.
2. Applicants will be sent or will download an application form, job description and person specification.
3. Applicants are asked to submit an application form when applying for positions within the School. The form requires a range of information, including:
  - full identifying details of the applicant including current and former names
  - a full history in chronological order since leaving secondary education, including periods of any post-secondary education or training, and part-time and voluntary work as well as full-time employment, with start and end dates,

explanations of periods not in employment, education or training, and reasons for leaving employment

- a declaration of any family or close relationship to existing employees or employers
- details of at least two professional referees. One referee should be the applicant's current or most recent employer. References are not accepted from relatives or from people writing in the capacity of friends, neighbours or colleagues. All references are verified by phone and annotated accordingly.

4. The application form will also record that:

- the successful applicant will be required to provide an Enhanced Disclosure from the DBS and evidence of/commitment to being on the DBS Update Service
- a Prohibition from Teaching check will be carried out
- a Barred List check for any staff in 'regulated activity' will be carried out
- confirmation of right to work in the U.K. will need to be provided
- for successful applicants who will be in a management position, we will undertake a section 128 check to ensure that the person is not prohibited from such a management position
- additional overseas checks for those who have lived or worked abroad for at least three months during the past five years will need to be evidenced
- if the applicant is currently working with children, his or her employer will be asked about disciplinary offences relating to children, including any for which the penalty time is expired and whether the applicant has been the subject of any child protection concerns, and if so, the outcome of any enquiry or disciplinary procedure. If the applicant is not currently working with children, a previous employer will be asked about those issues
- for applicants who may be involved in the childcare of our youngest children at the Prep. School, a childcare disqualification disclosure form will need to be completed
- providing false information is an offence and could result in the application being rejected, or summary dismissal if the applicant has been selected, and possible referral to the police.

5. The Job Description will state;

- the main duties and responsibilities of the post; and

- the individual's responsibility for promoting and safeguarding the welfare of pupils s/he is responsible for, or comes into contact with.
6. The Person Specification will:
    - include the qualifications and experience, and any other requirements needed to perform the role in relation to working with children and young people.
    - describe the competences and qualities that the successful candidate should be able to demonstrate;
    - explain how these requirements will be tested and assessed during the selection process. For example: The candidate will be required to be observed whilst teaching a lesson.
  7. All applications will be scrutinised by the Principal and/or Headteacher and one other to check for gaps and inconsistencies, including gaps in employment history.
  8. Candidates are made aware at the application stage that an online search will be carried out. Any concerns arising from an online search will be addressed and documented at interview.
  9. Shortlisted candidates will be invited to come into School to teach a lesson, sit a literacy test / spelling test and have an interview with the Principal and/or Head teacher and at least one other person. One person on each interview panel will have completed 'Safer Recruitment' training. Where possible, professional references will be sought and verified before the interview takes place.
  10. In the highly unlikely event that an Enhanced Disclosure cannot be obtained before the applicant's start date, the successful applicant may start work without a DBS certificate, if it has been applied for, a clear Barred List check has been received, a risk assessment undertaken and the person is suitably supervised. The School will check that the applicant is not subject to a prohibition order issued by the Secretary of State (those involved in teaching only) and/or a Section 128 (s128) direction (those involved in management only) prohibiting the person from being in a management position.

All candidates will be asked to bring with them to the interview documentary evidence of their home address and identity, for example, utility bills, a current driving licence or passport including a photograph and where appropriate, change of name documentation. Candidates will also be asked to bring along original documents confirming any educational and professional qualifications.

Overseas teachers will also need to provide documentary evidence of their right to work in the United Kingdom. For all applicants who have lived outside of the U.K. for more than three months in the last five years, we will ask the applicant to evidence or apply for an overseas police and/or other relevant vetting check.

A copy of the documents used to verify the successful candidate's identity and qualifications will be kept in their personnel file. The vetting checks are recorded on the School's Single Central Record.

11. Once an offer of employment is made, applicants will be asked to complete a medical questionnaire.

## **Volunteers**

St. John's makes occasional use of volunteers, such as when we undertake educational visits. Whenever we do, we pay regard to paragraphs 304 to 311 of 'Keeping Children Safe in Education' (September, 2023). In short, we supervise and fully risk assess the volunteer's involvement with pupils. Where they will be involved in regulated activity, we obtain an enhanced DBS check (including children's barred list information). We know that we are not legally permitted to request barred list information on a supervised volunteer, as they are not considered to be engaging in regulated activity.