



Safeguarding (Child Protection) Policy and Procedures

- 1. Key Personnel and Contact Details for Safeguarding at the School..... 4
- 2. Key External Agencies, Services and Professionals’ Contact Details 6
- 3. Introduction..... 8
- 4. Policy Statement, Principles and Aims 9
- 5. Policy Monitoring and Review 12
- 6. Roles and Responsibilities 12
- 7. Safeguarding Training 14
- 8. Safeguarding and Child Protection Training..... 14
- 9. Guidelines for Staff and Governors Dealing with Concerns about a Child and Disclosure 14
- 10. Dealing with allegations or concerns about adults..... 18
- 11. Designated Safeguarding Leads (DSLs) 18
- 12. Whistleblowing..... 18
- 13. Allegations Against Pupils: child-on-child abuse including sexual violence and sexual harassment..... 19
- 14. Teaching Pupils About Safeguarding..... 19
- 15. Arrangements for listening to pupils 20
- 16. Notifying Parents 20
- 17. Safeguarding Record Keeping at the Trust..... 21
- 18. Electronic Devices..... 21
- 19. Photography and Images 22
- 20. ESafety, including arrangements for filtering and monitoring..... 22
- 21. Children Absent from Education..... 23
- 22. Children potentially at greater risk of harm..... 24
- 23. School trips and off-site arrangements..... 25
- 24. Secure Trust Premises, Visiting Speakers and use of the premises for non-School activities..... 25
- 25. Early Years Foundation Stage..... 26
- 26. Information from previous schools/settings..... 26
- 27. Preventing Radicalism 26

Date of review	September 2024	Date ratified by Governors	October 2024
Date of next review	September 2025	Reason for review	Annual Review

Appendix 1 - The Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs).....	28
Appendix 2 - Types and Signs of Abuse.....	30
Appendix 3 - Child-on-child sexual violence and sexual harassment.....	37
Appendix 4 - The Prevent Duty: preventing radicalisation and extremism.....	43
Appendix 5 - Guidance for Staff, Governors and Volunteers on Suspecting or Hearing a Complaint of Abuse.....	46
Appendix 6 - Dealing with allegations or concerns about members of staff, The Headmaster, Governors or volunteers.....	47
Appendix 7 - Visiting Speakers.....	51
Appendix 8 - Related School Policies.....	52
Appendix 9 - Log of a Concern about a Pupil’s Safety and Welfare.....	53
Appendix 10 - Low Level Concerns Policy.....	54
Appendix 11 - Safeguarding Summary Sheet – Weekends and Out-of-Hours.....	60
Appendix 12- Safeguarding Reporting Summary for Staff (Hampton School).....	61
Appendix 13 - Safeguarding Reporting Summary for Staff (Hampton Pre-Prep & Prep).....	62

This policy is published on the websites of Hampton School and Hampton Pre-Prep & Prep School and is available to parents from the Bursary or the School Office at the respective schools upon request. It can be made available in large print or another accessible format as required.

This policy applies to the Hampton School Trust ('the Trust'), which comprises Hampton School and Hampton Pre-Prep & Prep School – HPP&P - (together also referred to as 'the School'), for children from the Early Years Foundation Stage (EYFS) to the Upper Sixth Form.

1. Key Personnel and Contact Details for Safeguarding at the School

Safeguarding Role	Name	Position at the School	Contact Details
HAMPTON SCHOOL			
Designated Safeguarding Lead (DSL)	Owen Morris (JOM)	Deputy Head	o.morris@hamptonschool.org.uk Extension : 4400
Deputy DSL (DDSL)	Pippa Message (PZM)	Deputy Head	p.message@hamptonschool.org.uk Extension: 4005
Deputy DSL (DDSL)	Mark Nicholson (MAN)	Deputy Head	m.nicholson@hamptonschool.org.uk Extension: 4227
Deputy DSL (DDSL)	Polly Holmes (PAH)	Assistant Head (Pastoral)	p.holmes@hamptonschool.org.uk Extension:1006
Deputy DSL (DDSL)	Victoria Smith (VMS)	Head of Year	v.smith@hamptonschool.org.uk Extension : 1007
The Headmaster, Hampton School Trust	Kevin Knibbs (KK)	The Headmaster	headmaster@hamptonschool.org.uk
HAMPTON PRE-PREP & PREP SCHOOL			
Designated Safeguarding Lead with responsibility for the EYFS (DSL)	Tammy Howard (TH)	Deputy Head (Pastoral) Hampton Pre-Prep & Prep	t.howard@hamptonprep.org.uk Extension: 4461
Deputy DSL (DDSL)	Imogen Murphy (IM)	Head of Pre-Prep	i.murphy@hamptonprep.org.uk Extension : 4480
Hampton Pre-Prep & Prep Headmaster	Tim Smith (TS)	Headmaster, Hampton Pre-Prep & Prep	t.smith@hamptonprep.org.uk Extension: 4461
<p>Safeguarding concerns can be emailed to the School Safeguarding staff (the applicable DSL and DDSLs) at safeguarding@hamptonschool.org.uk or safeguarding@hamptonprep.org.uk</p>			

GOVERNORS			
Chair of Governors & Nominated Lead Safeguarding Governor	Andrew Munday	Governor	ahm@hamptonschool.org.uk
Nominated Safeguarding Governor - Hampton School	Alice Yandle	Governor	avy@hamptonschool.org.uk
SCHOOL COUNSELLORS			
School Counsellor	Michael Uccelli	Counsellor	m.uccelli@hamptonschool.org.uk Extension: 4032 /4030
School Counsellor	Simeron Kaler	Counsellor	s.kaler@hamptonschool.org.uk Extension: 4032 /4030
School Counsellor	Vicci Nagli	Counsellor	v.nagli@hamptonschool.org.uk Extension: 4032 /4030

2. Key External Agencies, Services and Professionals' Contact Details

Single Point of Access Richmond and Kingston (SPA) (<i>Achieving for Children</i>)		Call 020 8547 5008 from 8am to 6pm, Monday to Friday, or 020 8770 5000 out of hours E: spa@richmond.gov.uk
Local Authority Designated Officer (LADO) Service	Guildhall 2 High Street Kingston upon Thames KT1 1EU	020 8891 7370; 07774 332675/07936 601423 E: LADO@achievingforchildren.org.uk
Police Child Abuse Investigation Team (CAIT)	Feltham Police Station, 34 Hanworth Road, Feltham, TW13 5BZ	020 8247 6331
Kingston and Richmond Safeguarding Children Partnership (KRSCP)	44 York Street Twickenham TW1 3BZ	T: 07834 386459 E: Klscb-support@kingrichlscb.org.uk Safeguarding : Kingston E: kingstoncluster-safeguarding@achievingforchildren.org.uk Mobile : 07876 578076 Duty: T: 020 8547 6611 Safeguarding: Richmond E: richmondcluster-safeguarding@achievingforchildren.org.uk Mobile: 07935 014637 Duty: T: 020 8891 7380
Education Safeguarding Coordinator,	Lucy MacArthur	E: lucy.macarthur@kingrichlscb.org.uk Mobile: 07866 031751
Initial Response		
Contact Details of Children's Services (Social Care) covering the catchment area		
Surrey	0300 470 9100 (out of hours 01483 517898)	
Surrey North East	0300 123 1610 (Elmbridge, Epsom, Spelthorne)	
Surrey North West	0300 123 1630 (Woking)	
Surrey West	0300 123 1640 (Guildford)	
Windsor and Maidenhead	01628 683150	
Hounslow	020 8583 6600	
Ealing	020 8825 8000	
Hammersmith and Fulham	0208 753 6600	
Merton	020 8545 4226 (out of hours 0208 770 5000)	
Wandsworth	020 8871 6622 (out of hours 0208 871 6000)	

NSPCC / Home Office Child Abuse Whistleblowing Helpline	0800 028 0285 help@nspcc.org.uk
Childline	0800 1111
Police	(Non-emergency point of contact) 101 School Liaison Officer PC Hannah Cullen Hannah.M.Cullen@met.police.uk
FGM Home Office line	999 (for urgent calls) or non-emergency 101
'Prevent' Contacts	

DfE contact: 020 7340 7264 counter.extremism@education.gsi.gov.uk

[Naheem Bashir Hate Crime and Prevent Coordinator Richmond](#)

naheem.bashir@richmondandwandsworth.co.uk

07855 971199

Rory Kenney-Herbert, Prevent lead for Kingston

rory.kenney-herbert@kingston.gov.uk or prevent@Kingston.gov.uk

07736 600027	
Anti-terrorist hotline	0800 789 321
Forced Marriage Unit	020 7008 0151 fmf@fco.gov.uk
Teaching Regulation Agency (TRA)	020 7593 5393 Misconduct.Teacher@education.gov.uk
The Disclosure and Barring Services (DBS)	03000 200 190 customerservices@dbs.gsi.gov.uk

In an emergency, or if you think a child is in immediate danger, call 999

3. Introduction

The Hampton School Trust (**the Trust**), which includes Hampton School and Hampton Pre-Prep & Prep School (HPP&P) fully recognises the contribution it makes to the safeguarding of pupils and the responsibility it has under Section 87(1) of the Children Act 1989, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 (as amended) to have arrangements in place to safeguard and promote the welfare, health and safety of children.

Safeguarding is everyone's responsibility; everyone who comes into contact with children and their families has a role to play in safeguarding. Safeguarding and child protection are at the heart of all we do, and our systems and processes should be applied in the best interests of the child.

The Hampton School Trust's **Safeguarding (Child Protection) Policy** has regard to the following legislation, regulations, statutory and non-statutory guidance and departmental advice:

- The Children Acts 1989 and 2004
- The Education Act 2002, Section 175
- Independent School Standards Regulations 2014 and Guidance (April 2019)
- Early Years Foundation Stage (June 2021)
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education (KCSiE) (September 2024)
 - KCSiE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (July 2021)
- Ofsted: Review of sexual abuse in schools and colleges (June 2021)
- Charity Commission guidance on safeguarding and protecting people for charities and trustees (June 2022)
- Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023. Prevent duty guidance is supplemented by non-statutory advice and a briefing note:
 - The Prevent duty: Departmental advice for schools and childminders (June 2015)
 - The use of social media for on-line radicalisation (July 2015)
- Relationships education, relationships, and sex education (RSE) and health education (September 2021)
- Children Missing Education (September 2016)
- Behaviour in schools (September 2022)
- Children's Social Care National Framework (December 2023)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)
- Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023)

- After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)
- Sexting in schools and colleges: sharing nudes and semi-nudes (UKCCIS) (December 2020)
- What to do if you are worried a child is being abused – Advice for practitioners (March 2015)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- National Police Chiefs’ Council - When to call the police, guidance for schools and colleges
- Searching, Screening and Confiscation guidance (Advice for Schools, 2022)
- Human Rights Act (1998)
- Equality Act (2010)

4. Policy Statement, Principles and Aims

The Trust’s Safeguarding (Child Protection) Policy:

- has been authorised by the Governing Body of the Trust;
- applies to all staff, contractors or volunteers who work with children, even where this is away from the Trust, for example on an educational visit. It also applies to the Governors.
- In this policy “staff” refers to all employees, volunteers, workers or self-employed contractors directly engaged by the Trust.

Other contractors who are employed by third parties, at times work with pupils. The Trust undertakes a risk-based approach to each contractor, taking into account whether they will be supervised and how regularly they will be on site to determine the level of obligations regarding reading and complying with this Policy and undertaking training.

Volunteers are permitted to participate in Trust events, such as assisting with School trips, by prior arrangement only. Volunteers will normally be persons known to the Trust e.g. a parent. Where such arrangements are of a one-off nature no formal child protection checks will be carried out unless the trip involves an overnight stop. They will not have unsupervised access to pupils. Where the arrangement is of a more regular, frequent or overnight nature e.g. involvement in longer trip, the Trust will follow safer recruitment practices as outlined in the **Recruitment, Selection and Disclosure Policy**. In particular, they will be issued with this Safeguarding (Child Protection) Policy and Procedures, Part 1 and Annex B of *Keeping Children Safe in Education, September 2024* (and other relevant policies on a risk-based approach) and they are **required** to confirm that they have read and understood them.

This policy uses the terms “child/ children” or “pupils”, which are defined for the purposes of this policy as a person under the age of 18. We recognise that the Trust continues to have safeguarding responsibilities towards pupils in the Trust’s care who are over 18, although notes that there may be some additional considerations in relation to them in terms of how the local authority or other relevant statutory agencies or partners may respond.

Every pupil should feel safe and protected from any form of abuse. This includes children who are in need (Section 17, Children Act 1989) and children who are at risk of harm (Section 47, Children Act 1989). The Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

The Trust will take all reasonable measures to:

- i) ensure that we practice safer recruitment in checking the suitability of all staff, contractors, Governors and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in *KCSiE September 2024*; the Education (Independent School Standards) (England) Regulations 2014 (as amended); the

Statutory Framework for the Early Years Foundation Stage and other relevant guidance applicable to the Trust. See also the Trust's separate **Recruitment, Selection and Disclosure Policy**.

- ii) ensure that where staff from another organisation are working on their own with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff;
- iii) follow the local inter-agency procedures of the Kingston and Richmond Safeguarding Children Partnership (including the *Multi-Agency Threshold Document, 2020*);
- iv) be alert to signs of abuse both in the Trust and from outside and to protect each pupil from any form of abuse, whether from an adult or another child; deal appropriately with every suspicion or complaint of abuse and to support any pupils who have been abused in accordance with their agreed child protection plans;
- v) provide appropriate training for staff and Governors, ensuring awareness that safeguarding and promoting the welfare of children and pupils is everyone's responsibility;
- vi) design and operate procedures which, so far as possible, ensure that staff and Governors who are innocent are not prejudiced by false allegations;
- vii) ensure a whole school approach to safeguarding. This means involving everyone in the School, and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development
- viii) promote a culture of "it could happen here" and to support staff who act as whistle-blowers in raising concerns about poor or unsafe practice and potential failures of the Trust's safeguarding regime; be alert to the medical needs of pupils with mental and physical health conditions and to the needs of those with Special Educational Needs or disabilities;
- ix) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- x) teach pupils about safeguarding, for example through use of online resources, through assemblies and the curriculum - Personal, Social and Health Education (PSHE) at Hampton School and Life Skills at HPP&P and additionally through Relationships Education (HPP&P) and Relationships and Sex Education (Hampton School);
- xi) take all practicable steps to ensure that Trust premises are as secure as circumstances permit and, where the Trust premises are rented out to third parties, steps are taken to ensure that appropriate arrangements are in place to keep children safe and operate procedures to promote the educational achievement of children who are looked after (See **Looked After Children Policy**);
- xii) have procedures in place for dealing with pupils that go missing from education (see **Missing Pupils Policy**);
- xiii) be alert to the threats of specific safeguarding issues as outlined by *KCSiE September 2024* and respond appropriately;
- xiv) have procedures in place to fulfil the Prevent Duty, to identify pupils at risk of radicalisation and extremism, protect them and making referrals as appropriate;
- xv) consider and develop procedures to deal with any other safeguarding issues that may be specific to individual children or young adults in the Trust or in the local area.

Definition of safeguarding

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to **Appendix 2** of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

Policy Principles

- The welfare of the child is paramount.
- All pupils, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff and Governors have an equal responsibility to act on any suspicion or disclosure that may suggest a pupil is at risk of harm; safeguarding and promoting the welfare of pupils is the responsibility of everyone who works at or volunteers at the Trust.
- Pupils, staff and Governors involved in child protection issues will receive appropriate support from the relevant members of the Senior Leadership teams of Hampton School and HPP&P, who will follow this guidance and statutory guidance in doing so.

Policy Aims

- To provide all staff and Governors with the necessary information and training which is regularly updated to enable them to meet their responsibilities to promote and safeguard the wellbeing of children;
- To ensure consistent good practice.
- To demonstrate the Trust's commitment with regard to safeguarding children to pupils, parents and other partners.
- To prevent harm by (a) providing excellent pastoral care; (b) ensuring that appropriate staff are properly recruited and trained; (c) teaching pupils, via PSHE (or Life Skills at HPP&P) and a varied curriculum to identify, reduce and manage risks. This includes educating pupils about the safe use of electronic equipment and access to the internet; and (d) promoting an ethos where pupils feel secure and able to talk.

5. Policy Monitoring and Review

The DSL for Hampton School or HPP&P (as appropriate, see Section 6 of this Policy) will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary. Staff will also be given the opportunity to contribute to and shape safeguarding arrangements, including the Safeguarding Policy.

Any child protection incidents within the Trust will be followed by a review of these procedures by the appropriate DSL and a report made to the Governing Body. Where an incident involves a member of staff, the Local Authority Designated Officer (LADO) will assist in this review to determine whether any improvements can be made to the Trust's procedures. Any deficiencies or weaknesses with regard to child protection arrangements at any time will be remedied without delay.

The Governors will undertake an annual review of this policy and its procedures including good co-operation with local agencies and of the efficiency with which the relevant duties have been discharged. The annual review and any changes to the policy will be signed off by the Governors at a full meeting, where the review will be discussed and the discussion minuted.

6. Roles and Responsibilities

1. Role of the Designated Safeguarding Lead (DSL) (see Appendix 1)

The Trust's Governing Body has appointed a member of the Senior Leadership Team at both Hampton School and HPP&P to be the DSL at the relevant Schools.

Owen Morris (JOM), the DSL for Hampton School and Tammy Howard (TH), the DSL for Hampton Prep-Prep & Prep, have primary responsibility for matters relating to child protection and safeguarding within the applicable part of the Trust. JOM is the Safeguarding Lead for the Trust as a whole and takes lead responsibility for leadership and management of the Trust's Safeguarding policy and procedures. In addition, there are four Deputy DSLs (DDSLs) at Hampton School and one Deputy DSL (DDSL) at HPP&P trained to the same standard as the DSLs.

- The DSL's responsibilities include managing referrals of pupils to children's social care; raising awareness of safeguarding issues within the Trust (including sharing information about safeguarding issues with teachers and Senior staff); being responsible for online safety; ensuring the Trust's Prevent Duty is met. **Appendix 1** sets out the role of the DSL in more detail (also see Annex C of *Keeping Children Safe in Education, September 2024*).
- The DSL(s) (and DDSLs) shall be given the time, funding, training, resources and support to enable them to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.
- Parents are welcome to approach the DSL(s) (and DDSLs) if they have any concerns about the welfare of any pupil in the Trust. If preferred, parents may discuss concerns in private with the pupil's form teacher or the applicable Headmaster, who will notify the appropriate DSL in accordance with these procedures. The names and contact details together with the main responsibilities of the DSL(s) (and DDSLs) are set out at the start of this Policy.

2. Role of the Governing Body

The Trust's Governing Body:

- nominates Mr A Munday as Lead Safeguarding Governor for the Trust and Ms A Yandle as the Nominated Governor. These Governors report directly to the Governing Body.
- reviews annually the Safeguarding Policy and to ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote the welfare of our pupils.

- ensures a DSL and DDSLs are in place at both Hampton School and HPP&P; they recognise the importance of the role of the DSL and DDSLs and support them, ensuring the training necessary to be effective is undertaken.
- ensures that there are safe and effective recruitment policies and disciplinary procedures in place. (See **Recruitment, Selection and Disclosure Policy**).
- recognises the contribution the Trust can make to helping pupils keep safe through the teaching and encouragement of responsible attitudes to adult life through PSHE (Life Skills at HPP&P) and other curriculum and co-curricular areas.
- ensures that the Trust's safeguarding arrangements take into account the procedures and practice of the Kingston and Richmond Safeguarding Children Partnership.
- ensures appropriate online filtering and monitoring systems are in place and that their effectiveness is regularly reviewed
- appoints a designated teacher to promote the educational achievement of pupils who are looked after (see **Looked After Children Policy**): at Hampton School this is one of the DDSLs, Miss P.A Holmes (Assistant Head) and at HPP&P this is the DSL (Tammy Howard).
- ensures all Governors receive appropriate safeguarding training (including online) at induction, so that they have the knowledge to assure themselves that the safeguarding policies and procedures are effective, allowing them to provide strategic challenge and enable them to support the delivery of a robust whole-School approach to safeguarding. Their training should be regularly updated (three-yearly).

3. Duty of staff and Governors

All staff and Governors are under a general legal duty:

- to protect pupils from abuse.
- to be aware of the terms and procedures in this Policy and to follow them.
- to have read and understood part 1, and Appendix B, of *KCSiE September 2024*.
- to have read, be familiar with and comply with the Staff Behaviour Policy. That document gives clear guidance about behaviour so as to avoid placing pupils or staff at risk of harm, or at risk of allegations of harm.
- to be aware of the signs of abuse and neglect so that they are able to identify potential issues (see **Appendix 2** for a detailed overview).
- to report any matters of concern to a DSL or to a DDSL immediately (further guidance is given in **Section 9** and **Appendix 5**).
- to understand that no single teacher or other professional can have a full picture of a pupil's needs and circumstances. If pupils and families are to receive the right help at the right time, all staff who come into contact with them have a role to play in identifying concerns, sharing information and taking prompt action.
- to understand the referral process if they are aware of allegations against a member of staff or Governor, or they are concerned about the behaviour of a member of staff or Governor (including The Headmaster, the Pre-Prep & Prep Headmaster, and the DSLs). Further guidance is given in Section 9 and Appendix 6.

The Trust's safeguarding and child protection procedures are not intended to prevent any person from making an immediate referral to children's social care or the police, especially if they are concerned that a pupil is suffering or likely to suffer significant harm.

7. Safeguarding Training

All staff will be provided with induction training that includes:

- (a) this Policy, including (including the policy and procedures to deal with child-on-child abuse);
- (b) the Staff Behaviour Policy, the Staff IT Acceptable Use Policy and the Whistleblowing Policy;
- (c) the identity and contact details of the DSL and the DDSLs;
- (d) a copy of Part 1 and Annex B of *KCSiE September 2024*;
- (e) a copy of the pupil behaviour policies – the Hampton School **Behaviour, Rewards, Sanctions, Discipline and Exclusion Policy** and **Code of Conduct** (and Hampton Pre- Prep & Prep’s **Policy to Promote Good Behaviour – Rewards – Sanctions – Exclusions**); child protection training that covers key issues from Part 1 and Annex B, of *KCSiE September 2024*;
- (f) Face-to-face safeguarding training by the DSL (or a DDSL) covering, among other things:
 - the Trust approach to online safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
 - the safeguarding response to unexplainable and/or persistent absences from education
- (g) Prevent online training course;
- (h) Online Safety online training course;
- (i) Child Protection in Education online training course, and
- (j) Raising Awareness of Child-on-Child Abuse

8. Safeguarding and Child Protection Training

- All staff and Governors, including The Headmaster and the Pre-Prep & Prep Headmaster, will receive a copy of this Policy and Part 1 and Annex B of *KCSiE September 2024*, and will be required to confirm that they have read these. The Trust has additional mechanisms to assist staff understanding of Part 1, for example through regular staff briefings on INSET.
- All staff (teaching and non-teaching), and volunteers will undertake appropriate child protection training in accordance with the Kingston and Richmond Safeguarding Children Partnership’s guidance. Initially, they are trained when they take up their posts within the Trust and will then receive regular safeguarding and child protection training, including on the Prevent Duty and on-line safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to the Trust’s filtering and monitoring procedures). This training will take place as required, but at least annually, with at least termly updates. All staff are required to complete the Educare Level 2 Child Protection in Education online course, to be updated every 3 years.

9. Guidelines for Staff and Governors Dealing with Concerns about a Child and Disclosure

- i. If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.
- ii. Teaching and non-teaching staff working at the Trust have a vital role to play in both the prevention and detection of abuse. All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of School, inside and outside of home, and online. Detection of abuse often depends in the first instance, on suspicion. Staff in particular are in a

unique position to observe the behaviour of pupils over time, and often develop close and trusting relationships with pupils. Staff may well be the first to suspect that something is amiss when an individual behaves atypically, withdraws from social contacts with others, exhibits anxiety or stress symptoms in School, appears distressed, confused or disturbed. Staff are always encouraged to report low level concerns that might form part of a bigger picture that can help promote the welfare of pupils.

- iii. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. They should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. Technology is also a significant component in many safeguarding and wellbeing issues. This can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
- iv. The safeguarding and child protection training provided to staff considers the types and signs of abuse of which they should be aware. They should understand the main categories of abuse (**see Appendix 2 for more detailed guidance**):
 - physical abuse
 - emotional abuse
 - sexual abuse
 - neglect

In addition, they should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of school and children are at risk of abuse and exploitation outside their families.

- v. **All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos.⁸ can be signs that children are at risk. Below are some specific safeguarding issues, as outlined in KCSiE 2024, that all staff should be aware of:**

(see Appendix 2 for more detailed guidance):

- Child Sexual Exploitation (CSE)
- Honour-based Abuse - including Female Genital Mutilation (FGM) and Forced Marriage (**see Appendix 2, 1.6.2**)
- Domestic abuse
- The threat from radicalisation and the Prevent Duty (**see Appendix 4**)
- Mental health (**see Section 22**)
- Children missing in education (**see Section 21**)
- Child on Child abuse (**see Section 13 and Appendix 3**)
- Sexual violence and sexual harassment between children (**see Section 13 and Appendix 3**)
- Child Criminal Exploitation (CCE), including county lines (**see Appendix 2, 1.6.5**)
- Serious violence
- Contextual safeguarding

Dealing with disclosure: It takes a lot of courage for a pupil to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Key points to remember when dealing with disclosure are to avoid asking leading questions and to explain that confidentiality cannot be promised. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, neglected or exploited and they may not recognise their experiences as harmful. They may feel embarrassed, humiliated or threatened, but this should not prevent staff having a professional curiosity and speaking to the DSL if they have a concern about a child. **See paragraphs 467-479 of KCSiE September 2024** for further guidance about responding to a disclosure.

If a member of staff or Governor is concerned about the welfare of a pupil, the matter should be referred to the applicable DSL, (or a DDSL) as soon as possible and they will contact children's social care as appropriate. If a member of staff or Governor is aware that there is a pupil in danger of immediate harm (a child at risk), a referral must be made by either the DSL or the member of staff immediately (where a member of staff makes a referral directly, they should inform the DSL as soon as possible thereafter). If a member of staff or Governor hears a complaint of abuse, the procedures set out in **Appendix 5** (Guidance for Staff on suspecting or hearing a complaint of abuse) must be followed.

Early help: Staff and Governors must be alert to the potential need for early help. Early help is defined as providing support as soon as a problem emerges in a pupil's life; providing early help can be more effective in promoting the welfare of pupils than reacting later. Staff should be particularly alert to a pupil who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from school
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves

- is at risk of so-called ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

In the first instance, staff should discuss early help requirements with the DSL. Where a pupil would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged, including the use of the “Common Assessment Framework” (CAF) and “Team around the Child” (TAC). Section 1, Chapter 3 of *Working Together to Safeguard Children (2023)* provides detailed guidance on the early help process. Staff may be required to support other agencies and professionals in an early help assessment. If early help is appropriate, the matter will be kept under review and consideration given to making a referral to children’s social care if the pupil’s situation does not appear to be improving.

Action by the DSL once a concern has been raised

- Referrals will usually be carried out by the applicable DSL or in their absence by one of the DDSLs.
- The Trust will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of a pupil.
- The Trust will cooperate with the police and social services to ensure all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act (1989) in accordance with the requirements of *Working Together to Safeguard Children (2018)*. Staff should refer to the Safeguarding Reporting Summary for Staff - Appendix **12 (Hampton School)** and **Appendix 13 (HPP&P)**.

On being notified of a complaint or suspicion of abuse, the action to be taken by the DSL will take into account:

- the local inter-agency procedures of the Kingston and Richmond Safeguarding Children Partnership, with particular reference to the Multi-Agency Threshold Document 2020;
- the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care and the police;
- the pupil’s wishes or feelings; and
- duties of confidentiality, so far as applicable.

If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a pupil may be at risk of significant harm, a referral to children's social care will be made without delay (and in any event within 24 hours).

If the initial referral is made by telephone, the DSL will confirm the referral in writing to the children's social care within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the children's social care again.

- The DSL will ensure a Safeguarding File is opened and kept up to date. They will then ensure they promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues appropriately with teachers and Senior staff.
- In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support or early help from one or more agencies, the DSL will liaise with children's social care and where appropriate an inter-agency assessment will

take place, including use of the Common Assessment Framework (CAF) and Team around the Child (TAC) approaches, as necessary.

- Conversations between safeguarding designated persons at different schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable. Any relevant safeguarding information becoming known should be carefully logged.

10. Dealing with allegations or concerns about adults

- The Trust has procedures for dealing with allegations against staff (including supply staff, agency staff and volunteers) and Governors who work with children and pupils that aim to strike a balance between the need to protect children and pupils from abuse and the need to protect staff, Governors and volunteers from false or unfounded allegations. **These procedures are set out in Appendix 6** and follow Part 4 of *KCSiE September 2024*.
- The LADO will be informed immediately and, in any event, within one working day of all allegations or concerns against staff, Governors and volunteers that come to the Trust's attention and appear to meet the criteria set out in **paragraph 1 of Appendix 6**.
- Detailed guidance is given to staff, Governors and volunteers to ensure that their behaviour and actions do not place children and pupils, or themselves, at risk of harm or of allegations of harm to a child or pupil. This guidance is contained in the **Staff Behaviour Policy** and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils (for instance in music or sports coaching);
- Low level concerns about an adult should be reported as set out in **Appendix 6, paragraph 7**. Such concerns would be that an adult may have acted in a manner inconsistent with the Staff Behaviour Policy or there is unease about the adult's behaviour particularly towards, or around, children or pupils.

11. Designated Safeguarding Leads (DSLs)

The DSLs and the DDSLs must undertake "Level 3" safeguarding and child protection training, and training in inter-agency working, and will attend training at two-yearly intervals, with regular updates at least annually. For further details about the training of the DSLs and the DDSLs (see **Appendix 1**).

All training will be carried out in accordance with Kingston and Richmond Safeguarding Children Partnership procedures.

12. Whistleblowing

- The Trust's separate **Whistleblowing Policy** sets out the procedures for reporting wrongdoing by staff in the workplace or failures to safeguard properly the welfare of pupils. It is important that all staff are aware of the procedures and that there is a culture in the Trust that enables safeguarding concerns to be raised.
- Where a staff member feels unable to raise an issue with their employer or feels their concerns are not being addressed, other whistle-blowing channels are open to them, such as the NSPCC whistle-blowing helpline, 0800 028 0285 or email help@nspcc.org.uk

13. Allegations Against Pupils: child-on-child abuse including sexual violence and sexual harassment

- Safeguarding issues can manifest themselves via child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously.
- Child-on-child abuse (see **Appendix 3**) may involve bullying (including cyber bullying), but can manifest itself in many ways, for example: sexual violence and sexual harassment; physical abuse; upskirting (typically involving taking a picture under a person's clothing without them knowing), sexting (or youth produced sexual imagery); initiation/hazing-type violence and rituals. Allegations of child-on-child abuse should always be reported to the applicable DSL (or a DDSL).
- The Trust's Anti-Bullying Policies outlines details of how each School within the Trust deals with allegations of bullying behaviour by pupils. The Trust employs a range of measures to minimise the risk of child-on-child abuse (see **Appendix 4, Anti-Bullying Policy** and the **Behaviour, Rewards, Sanctions, Discipline and Exclusion Policy** (and HPP&P policies - **Policy to Promote Good Behaviour – Rewards – Sanctions – Exclusions** and **Anti-Bullying Policy**). Pupils are regularly taught about acceptable behaviour and how the School deals with poor behaviour. Abusive behaviour is taken seriously and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.
- The Trust's **E-Safety Policy** outlines the Trust's approach to **sexting**: if staff become aware of a sexting incident then they must report it to the DSL or a DDSL. When the School becomes aware of a sexting incident, it will follow the procedures and guidance as set out in *Sexting in Schools and Colleges: sharing nudes and semi-nudes (UKCCIS, 2020)*.
- The Trust will take advice from children's social care and/or the police regarding the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the victim(s) or perpetrator(s) accused of abuse.
- If a child makes a **report of sexual violence or sexual harassment**, it is important that they are taken seriously and reassured that they will be supported and kept safe. As with all safeguarding matters, it is important that the DSL is informed as soon as is practicable.

Further information on child-on-child abuse, including sexual violence and sexual harassment, can be found in Appendix 3.

14. Teaching Pupils About Safeguarding

- The Trust is committed to teaching pupils how to keep themselves and others safe and it recognises that schools can play crucial role in preventative education. There is a whole school approach to this that demonstrates the School values and standards throughout all aspects of School life.
- The Trust promotes the welfare of pupils through the assemblies' programme; through year group assemblies; through pastoral and parents' forums; through the counselling service; and through the Hampton School PSHE lessons (Life Skills at HPP&P).
- Safeguarding is covered as a topic in PSHE lessons at Hampton (Life Skills lessons at HPP&P): pupils are given information about how to avoid situations and to whom to report their concerns.
- The PSHE/Life Skills programme covers other issues that play a part in safeguarding children. This programme includes both Relationships Education (HPP&P) and Relationships and Sex Education (Hampton School), where relevant issues are taught in a sensitive and age-appropriate manner. This programme will tackle, at an age-appropriate stage, issues such as:

healthy and respectful relationships; boundaries and consent; stereotyping, prejudice and equality; body confidence and self-esteem; how to recognise an abusive relationship, including coercive and controlling behaviour; the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called 'honour'-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support;

- What constitutes sexual harassment and sexual violence and why these are always unacceptable.
- **Anti-bullying, E-Safety** and the issue of radicalism and extremism (**Section 27 and Appendix 4**) are all covered in a structured programme, as are other issues such as mental health, illegal substances and body image.

15. Arrangements for listening to pupils

- Every pupil should feel able to raise concerns with any member of staff whom they feel they can trust. Staff and Governors who hear about concerns, suspicions or allegations from a pupil must relay the concerns immediately and appropriately, to the relevant person – usually this will be to the appropriate DSL or a DDSL. More detailed guidance is provided in **Section 9** of the policy and in **Appendix 5**.
- Pupils are encouraged to share any concerns they may have with Form Tutors, Heads of Year, Sixth Form Mentors (in the First Second and Third Year) or any member of staff. School Counsellors and the School Nurses are available on-site to listen to pupils (and they can be contacted directly via email: counselling@hamptonschool.org.uk and nurse@hamptonschool.org.uk).
- A notice **Where to go if you have a concern or need help** is displayed in Form Rooms.
- Pupils are informed of the identity of the DSL and DDSLs and notices confirming their identity are prominently displayed around the School. Pupils are encouraged to raise any concern about their own or somebody else's wellbeing by using the email address: safeguarding@hamptonschool.org.uk

16. Notifying Parents

The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child, the School should not seek to discuss with parent before contacting the Single Point of Access. It is legitimate to share concerns without consent when there is good reason to do so and that sharing the information will enhance the safeguarding of the child in a timely manner.

See also **sections 2 and 3 of Appendix 6** for details about the reporting and disclosure of information where an allegation has been made against a member of staff, a Governor, a volunteer, The Headmaster of the Hampton School Trust or the Hampton Pre-Prep & Prep School Headmaster.

17. Safeguarding Record Keeping at the Trust

- Safeguarding records are kept securely on CPOMS (Child Protection Online Monitoring and Safeguarding System), including all reports, notes and correspondence referring to a pupil. Pupils who have a safeguarding file in addition to their normal School file have a sticker placed on the front of their normal School file with this information. Safeguarding information is confidential and should not be kept on the child's School file. Parents do not have automatic access to the safeguarding file.
- Schools should be notified by children's social care when a child on the safeguarding register starts at the Trust, or if a pupil's name has been placed on the register or removed from the register. If a safeguarding file has been started for a pupil who then moves school, the file should be sent to the receiving school/college. The information should be sent securely under separate cover, in a sealed envelope to the DSL of the receiving school/college, marked 'Strictly Confidential'.
- Not all safeguarding information results in a referral. A record is made of any information, including hearsay and 'nagging doubts'. So that all information can be kept together, this information should be passed to the DSL/DDSLs using the email address safeguarding@hamptonschool.org.uk or safeguarding@hamptonprep.org.uk (as appropriate). Alternatively, staff can fill in a *Log of a Concern About a Child's Safety and Welfare* (see **Appendix 9**) which can be found on SharePoint (for Hampton School) or in the Documents area (Safeguarding) on Cezanne for HPP&P.

Hampton School - [Safeguarding \(Log of Concern form\)](#)
Hampton Pre-Prep & Prep - [click here](#)

- All safeguarding concerns, discussion and decisions should be recorded in writing. A record should include:
 - A clear and comprehensive summary of the concern;
 - Details of how the concern was followed up and resolved, including the rationale for any decisions made, and a note of any action taken, decisions reached and the outcome.
 - If in doubt about the recording requirements, staff should discuss with the DSL.
- Access to safeguarding files: access to the information on file should be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the pupil and family should be respected as far as possible, but the welfare of the pupil is paramount.
- All information must be shared with children's social care and/or Police as appropriate, where there is concern that a pupil is at risk of significant harm. Safeguarding information should not ordinarily be shared with agencies other than these statutory agencies e.g. information should not be released to solicitors etc.
- The Data Protection Act 2018 and UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, but it does not prevent the sharing of information for the purposes of keeping children safe. For more guidance see - *"Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers" (July 2018)*.
- *Staff Guidelines – Retention of Documents* outlines how long the Trust retains information relating to safeguarding matters.

18. Electronic Devices

- The School Codes of both Hampton School and HPP&P set out the expectations on pupils' use of mobile telephones: these rules vary across the year groups as they are age appropriate. In Pre-Prep (including the EYFS) pupils are not permitted to bring mobile phones or any mobile device with imaging and sharing capabilities onto the premises.

- Expectations of staff use of mobile phones are outlined in the **Staff Behaviour Policy**. The use of any electronic device with imaging and sharing capabilities is strictly forbidden in EYFS areas, therefore staff at Hampton Pre-Prep & Prep must only use their devices in the staff room, or in classrooms that are empty of children. The only exception to this is when designated staff with prior permission of the Hampton Pre-Prep & Prep Headmaster are using their mobile phones to take promotional photographs as set out below.

19. Photography and Images

- As set out in the Trust's Terms and Conditions, the Trust will include some photographs or images of pupils in the Trust's promotional material. Details such as the home address of the pupil will not be disclosed without parents' consent. Parents who do not want their child's name or photograph or image to appear in any of the Trust's promotional material must make sure that their child knows this and must write immediately to the applicable Headmaster stating this, requesting an acknowledgement of their letter. Guidelines for staff taking photographs for these purposes are set out in the **Staff Behaviour Policy**.
- Staff at Hampton Pre-Prep & Prep must only use the Schools' cameras and devices; they **must not** photograph pupils using their personal photographic equipment (including cameras, iPads or mobile phones) unless prior permission has been given by the Hampton Pre-Prep & Prep Headmaster.
- Photographs, digital images or videos of pupils may be taken by parents and family members, either on the Trust's sites or when pupils are involved in organised activities off site. Parents should be mindful of the need to use cameras with consideration and courtesy for the comfort of others and they should not take photographs of other pupils on their own without the prior agreement of that child's parents.
- To respect the privacy of others, and in some cases for child protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the Internet.

20. ESafety, including arrangements for filtering and monitoring

- It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety is required to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in and escalate concerns where appropriate.
- On-line safety is the responsibility of the DSL(s). At Hampton School the DSL will work closely with the Head of PHSE and ESafety Officer and with PZM (who is one of the DDSs and Deputy Head with responsibility for IT). At HPP&P the DSL will work closely with the SLT regarding ESafety. Staff are given clear guidelines for the appropriate use of technology and detailed guidance is provided in the **Staff Behaviour Policy**.

Filtering and Monitoring

The Trust has put in place appropriate filters and monitoring systems to protect children, while being mindful not to place unnecessary restrictions on their learning. Hampton Trust uses Smoothwall to filter the content on the School network (and School issued laptops), and also uses Securus to monitor the

online behaviour of users of the network, to safeguard children from potentially harmful and inappropriate online material. In addition to the real time monitoring, all systems are formally reviewed annually.

Staff safeguarding training regularly explains both the importance of filtering and monitoring and the processes that the Trust use. The DSL(s) and DDSLs, along with Mr R. Davieson (Online Safety Officer at Hampton School) monitor online behaviour of pupils on the School's network.

- Mobile devices and computers are a source of education, communication and entertainment. However, we know that some adults and young people may use these technologies to harm children.

KCSiE September 2024 outlines four areas of risk:

- i. online content (being exposed to harmful material);
 - ii. contact (being subjected to harmful interaction with others online);
 - iii. conduct (personal online behaviour that increase the likelihood of, or causes, harm); and
 - iv. commerce (risks such as online gambling, inappropriate advertising, phishing or financial scams).
- The Trust understands that many pupils will have access to the internet via mobile phone networks (i.e. 3G, 4G, 5G), which may allow them to share harmful content or use this technology to harass or bully other. The rules about the use of mobile technology/devices during the School day are set out in the School Codes, restricting the opportunities for younger pupils to access the internet via 3G/4G/5G. Pupils receive guidance, education and training on cyber/online safety through the PSHE/Life Skills programmes. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through anti-bullying procedures, and they can be escalated to safeguarding concerns. Please refer to the **Hampton School E- Safety Policy and Anti-Bullying Policy** (or **Hampton Pre- Prep & Prep's separate Anti- Bullying policy**) for further information.
 - **Remote learning:** it is not expected that teaching and learning will be conducted remotely. If circumstances change, more detailed guidance for teaching and learning in an online environment will be issued. These communications will be used to reinforce the importance of children being safe online. Parents and carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the School their child is going to be interacting with online.
 - Sexting and the sharing of youth-produced sexual imagery: **see the guidance in Appendix 3: Allegations Against Pupils: child-on-child abuse and bullying.** More detailed guidance is outlined in the **ESafety Policy**.

21. Children Absent from Education

- A pupil who is absent from education for prolonged periods and / or on repeat occasions is a potential indicator of abuse, neglect, or exploitation. All staff should be aware of the requirement to promptly report any unexplainable and/or persistent absences from education.
- School attendance registers are carefully monitored to identify any trends. Action should be taken if any absence of a pupil gives rise to concerns about their welfare. The Trust holds more than one emergency contact number for each pupil (in accordance with *KCSiE September 2024*) in order to facilitate contacting parents or guardians if a pupil is not at school when they are expected to be here.

- The Trust will inform the local authority if any pupil fails to attend school regularly or has been absent without the Trust's permission for a continuous period of 10 school days or more.
- The Trust will immediately inform the local authority of any pupil who is going to be added or deleted from the admission register/school roll at a non-standard transition point.
- All staff should be aware of the Trust's procedures that are used for searching for and reporting any pupil missing from the Trust. The procedure includes the requirement to record any incident, the action taken, and the reasons given by the pupil for being missing; and to help prevent the risks of their going missing in future.
- Please see the Trust's **Missing Pupil Policy** for further details.

22. Children potentially at greater risk of harm

a) Children with special educational needs (SEN) and disabilities

Pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges and staff should be aware that additional barriers can exist when recognising abuse neglect, or exploitation in this group of pupils, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying, or child-on-child abuse, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers

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

b) Children requiring mental health support

- Staff at the School 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. School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that could be of concern.
- Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the DSL or one of the DDSLs. Please see Hampton School Trust's **Mental Health Policy** for further details.

c) Children who need a social worker

When a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. The DSL (or DDSLs) will ensure these needs are taken into account when making plans to support pupils who have a social worker.

d) Looked After Children

It is recognised that *Looked After Children* are more vulnerable and therefore may be at risk of suffering abuse, neglect or exploitation (see **Looked After Child Policy**). The DSL (or DDSLs) will offer assistance to staff when making plans to support such pupils in school.

e) LGBT+ gender questioning children

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils' individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will refer to (to the extent that it is reflected in *KCSIE*), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed. Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

23. School trips and off-site arrangements

- During School trips and off-site activities, the Trust's normal Safeguarding (and Child Protection) Policy and Procedures apply, as does the Staff Behaviour Policy. Hampton School's Health and Safety and Educational Visits procedures are set out in a separate policy: **Health and Safety of Pupils on Educational Visits Policy** (or HPP&P's separate **Educational Visits Policy**).
- With regard to 'home stays', the Trust obtains an enhanced DBS for the adult(s) in the household who are responsible for the visiting pupil.

24. Secure Trust Premises, Visiting Speakers and use of the premises for non-School activities

- The Trust will take all practicable steps to ensure that its premises are as secure as circumstances permit. Visitors to the Trust are required to sign in and are given a visitors' badge, which must be clearly displayed and worn at all times while they are on site, confirming they have permission to be on-site. In addition, they should be escorted by a member of staff whilst on School premises.
- **Visiting speakers:** The Trust ensures all Visiting Speakers (i.e. visitors to the Trust who give talks, seminars, practical workshops, either face-to-face or remotely) are suitable and appropriately supervised. Members of staff organising the visit must complete and submit a Visiting Speaker form, which should be passed to either JOM or PZM (Hampton School) or IM or TH (HPP&P), who will decide whether a written Risk Assessment is required – **see Appendix 7**. At Hampton, forms can be found in the Common Room or downloaded from SharePoint - [Visiting Speaker form](#)
- At HPP&P staff should request a form from the Office Manager or download from SharePoint - [click here](#)
- When the School rents or hires out the premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place. The School will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)* and will seek assurance in this regard.
- The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

- If the School receives safeguarding allegations relating to an incident that happened when a separate organisation /individual was using the premises, the School will manage this in line with its own safeguarding policy and inform the LADO as required.

25. Early Years Foundation Stage

- The Trust has additional safeguarding and child protection responsibilities set out in the Statutory Framework for the Early Years Foundation Stage (EYFS). Registered providers must notify Ofsted within 14 days of any allegation of serious harm or abuse by any persons living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). This is the case within the Trust: the Trust informs Ofsted and the local Early Years' Service, as well as the Single Point of Access, of any allegations of serious harm.
 - a. **Positive Handling at Hampton Pre-Prep & Prep:** As set out in the Hampton Pre-Prep & Prep School's Terms and Conditions, parents give their consent to such physical contact as may accord with good practice and be appropriate and proper for teaching and instruction, and for providing comfort to a pupil in distress or to maintain safety or good order, or in connection with a pupil's health and welfare. Please refer to the Restrictive Physical Intervention Policy for further information.
 - b. **Supervision Meetings:** In accordance with the Statutory Framework for the Early Years Foundation Stage, termly supervision meetings take place between the Head of Pre-Prep and members of staff in the Pre-Prep.
 - c. **Use of cameras, mobile phones and other electronic devices with imaging and sharing capabilities:** The Trust provides a number of cameras for use in school, therefore, members of staff at HPP&P are not permitted to use their own cameras unless permission has been granted by the Hampton Pre-Prep & Prep Headmaster. Mobile phones, cameras and other electronic devices with imaging and sharing capabilities are strictly forbidden in EYFS areas, therefore staff at Hampton Pre-Prep & Prep must only use such devices in the staff room, or in classrooms that are empty of children (**see point 18 above**).

26. Information from previous schools/settings

- It is a legal requirement that schools should be informed of any safeguarding and child protection issues that have arisen in a pupil's previous school/setting. The Trust, therefore, sends out a form to previous schools/settings to get this information from them before new pupils join Hampton School or HPP&P; this enables the Trust to ensure that any relevant measures are in place when the pupil arrives and that key staff, such as the Heads of Learning Support, are aware of any needs.
- In accordance with the Kingston and Richmond Safeguarding Children Partnership, Hampton School and HPP&P report details of any pupils leaving or joining the schools at non-standard transition times to the Local Authority.

27. Preventing Radicalism

- The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including schools, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent Duty").
- Protecting pupils from the risk of radicalisation is part of the Trust's wider safeguarding duties and is similar in nature to protecting pupils from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

- The applicable DSL is the Trust's point of contact to oversee and coordinate the implementation of the Trust's Prevent Duty. The DSL and DDSs undertake Prevent awareness training and are able to provide advice and support to other members of staff.
- The Trust will work with Kingston and Richmond Safeguarding Children Partnership and make referrals, where appropriate, through the **Channel programme (see Key Contact Details – Section 2)**.
- The DSL has compiled a Prevent Risk Assessment for the Hampton School Trust to identify potential risks and to establish appropriate measures in response.
- The Trust helps to protect pupils from extremist views in many of the same ways that they help to safeguard pupils from other dangers. This is through staff training to make them aware of the risks, through PSHE/Life Skills lessons, through having appropriate filtering and monitoring processes in place, through procedures for ensuring visiting speakers are suitable and through ICT policies.
- Staff are alert to changes in pupil's behaviour that could indicate that they may be in need of help or protection. All staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.
- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Further information on preventing radicalisation and extremism, including examples of indicators of pupils who can be vulnerable to radicalisation, can be found in **Appendix 4**.

Appendix 1 - The Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs)

In accordance with Annex C of *KCSiE September 2024*, the main responsibilities of the DSL are set out below. These activities can be delegated to the Deputy DSLs (DDSLs), although the ultimate responsibility remains with the DSL. Within the Hampton Trust there are separate DSLs for Hampton School and HPP&P. During term time the DSL (or deputy) should always be available (during school hours) for staff to discuss any safeguarding concerns.

Training

The DSL and Deputy DSLs are trained to the same standard and their job descriptions include the key activities of their role. They undertake child protection (Level 3) training and training in inter-agency working, and this is updated at two-yearly intervals. In addition, their knowledge and skills should be refreshed or updated (for example by e-bulletins, meeting with other DSLs etc.) at regular intervals, at least annually. This training is completed in order to:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of locally agreed procedures for child protection and inter-agency working, in particular how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures and the Staff Behaviour Policy;
- are alert to and support the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate and secure written records of concerns and referrals;
- understand and support the school with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses including training on harmful sexual behaviours in children; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In each School the DSL/DDSL responsibilities are as follows, as stipulated in KCSiE:

Managing referrals

- to take lead responsibility for referring cases of suspected abuse, neglect, or exploitation of any pupil within the School to children's social care, working with the Kingston and Richmond Safeguarding Children Partnership (including the Multi-Agency Threshold Document 2020), or other local authorities as appropriate. The DSL must be aware of pupils who have a social worker and ensure they are supported appropriately.
- to support staff who make referrals to children's social care.
- to take lead responsibility for making referrals to the Disclosure and Barring Service (DBS) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a pupil and the Teaching Regulation Agency (as appropriate).
- to take lead responsibility for making referrals to the police where a crime may have been committed which involves a pupil.
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Working with others

- act as a point of contact with the safeguarding partners (particularly Achieving for Children and the Kingston and Richmond Safeguarding Children Partnership), having have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; they attend the KRSCP DSL termly forums;
- liaising with The Headmaster in respect of police investigations or investigations under section 47 of the Children Act 1989 that involve the Trust. This should include being aware of the requirement for children to have an Appropriate Adult;
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (particularly key pastoral staff, School nurses, School Counsellors, the SEND department, mental health trainers) on matters of safety and safeguarding;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children;

Raising Awareness

- ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- ensure this policy is available publicly;
- ensure that parents are aware that referrals about suspected abuse, neglect or exploitation may be made to children's social care and the trust's role in this;
- maintain links with the Kingston and Richmond safeguarding children partnership to ensure staff are aware of training opportunities and the local policies on safeguarding;
- taking responsibility for online safety, understanding the unique risks associated with online safety and be confident that they have the relevant knowledge and capability to keep pupils safe online; they must understand the additional risks that pupils with SEN and disabilities (SEND) face online.

Information Sharing and Managing Child Protection Records

- ensure that child protection files are kept up to date and held confidentially and securely, keep detailed, accurate records of concerns and referrals;
- understand the importance of information sharing, both within the school and with other schools, as well as with safeguarding partners and other agencies;
- the DSL will ensure that when a pupil leaves the applicable school, the child protection file must be transferred to the new school or college as soon as possible (and within five days for an in-year transfer or within the first five days of the start of the new term). they should consider whether it would be appropriate to share information in advance of the pupil leaving, if that would assist putting support in place for when the pupil arrives.

Prevent

The DSL is responsible for ensuring that the Trust's “Prevent” Duty is met. The DSL will complete appropriate “Prevent” awareness training. The DSL is expected to:

- refer cases to the Channel programme where there is a radicalisation concern;
- support staff who make referrals to the Channel programme.

Appendix 2 - Types and Signs of Abuse

1. Types of Abuse

Abuse is a form of maltreatment of a pupil. Somebody may abuse, neglect or exploit a pupil by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children; they may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Abuse can also include ill-treatment that is not physical, as well as the impact of witnessing ill-treatment of others, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

KCSiE September 2024 defines the following types of abuse:

- Physical abuse
- Emotional Abuse
- Sexual Abuse and Neglect

However, staff should be aware that the types and indicators of abuse often overlap with each other and abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label.

- 1.1. Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a pupil. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a pupil.
- 1.2. Emotional abuse:** the persistent emotional maltreatment of a pupil such as to cause severe and adverse effects on the pupil's emotional development. It may involve conveying to a pupil 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 pupil 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 pupils. These may include interactions that are beyond a pupil's developmental capability as well as overprotection and limitation of exploration and learning or preventing the pupil participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils. Some level of emotional abuse is involved in all types of maltreatment of a pupil, although it may occur alone.
- 1.3. 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 or young person 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 or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children or pupils. The sexual abuse of children by other children is a specific safeguarding issue in education (**see. Para 1.6.5**).

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

1.6 Keeping children safe in education also acknowledges the following as specific safeguarding issues

(see Annex B of Keeping Children Safe in Education 2024 for more details)

1.6.1 Child Sexual Exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to having sex. Some children may not realise that they are being exploited e.g. they believe they are in a genuine romantic relationship.

1.6.2 “Honour-based” abuse: including Forced Marriage and Female Genital Mutilation. Female Genital Mutilation (FGM) is one example of so-called “honour-based” abuse which have been committed to protect or defend the honour of the family or community. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. While Hampton School is a boys’ school, there are girls at HPP&P (up to the end of Year 2). Additionally, staff work with girls as part of the school’s partnership or outreach programme, or staff may become aware of a sibling or family member of a pupil being at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines.

Since 31 October 2015 there has been a mandatory reporting duty placed on teachers to personally report to the police where they discover that an act of FGM appears to have been carried out on a girl who is aged under 18. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the DSL and involve children’s social care as appropriate.

The duty does not apply in relation to at risk or suspected cases: in these cases, teachers should follow local safeguarding procedures.

1.6.3 Domestic abuse

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

Children can be victims of domestic abuse. They may witness and be adversely affected by domestic abuse in the context of their home life where it occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The School is enrolled onto the Operation Encompass scheme, a joint project between the Metropolitan Police Service and London Schools, which enables schools to offer immediate support to children experiencing domestic abuse. The police share all incidents of domestic abuse with schools, not just those incidents where an offence can be identified. This helps us provide the right support, at the right time, for children who are experiencing domestic abuse.

1.6.4 Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. It can also include children being forced to work in cannabis factories, being coerced into moving drugs or money across the county (county lines – see below), forced to shoplift or pickpocket, or to threaten other young people. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purposes of exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, professionals should be aware that girls are at risk of criminal exploitation too. It is important to note that both boys and girls being criminally exploited may be at a higher risk of sexual exploitation.

1.6.5 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines where they can easily become trapped. Further guidance can be found via the gov.uk website: *gangs and youth violence*.

Missing episodes (both from home and school) are an indicator of involvement in county lines. When the victim may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual, involve force and/or enticement- based methods of compliance and is often accompanied by violence or threats of violence;

- Can be perpetrated by individuals or groups, males or females and young people or adults;
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

1.6.6 Upskirting

The Voyeurism (Offences) Act, commonly known as the Upskirting Act came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

1.6.7 Serious violence

Children are at risk from, or may become involved in, serious violent crime. Indicators may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate that children have been approached by, or are involved with, criminal networks or gangs.

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see below). All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

1.6.8 Contextual Safeguarding

Safeguarding incidents or behaviours can be associated with factors outside of School. Assessments of children should therefore consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. All staff, but especially the DSL/DDSLs should provide as much information about such factors as part of any referral to children's social care.

1.6.9 Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

2. Recognising Abuse

2.1 Physical Abuse

Physical signs to look out for:

- Injuries that the pupil cannot explain or explains unconvincingly.
- Injuries that have not been treated or treated inadequately.
- Injuries on parts of the body where accidental injury is unlikely, such as the cheeks, chest or thighs.
- Bruising which reflects hand or finger marks.
- Cigarette burns, human bite marks.
- Broken bones (particularly in children under the age of two).
- Scalds, especially those with upward splash marks where hot water has been deliberately thrown over the pupil, or 'tide marks' – rings on the pupil's arms, legs or body where the pupil has been made to sit or stand in very hot water.

Behavioural signs to look out for:

- A pupil who is reluctant to have his parents contacted.
- Aggressive behaviour or severe temper outbursts.
- A pupil who runs away or shows fear of going home.
- A pupil who flinches when approached or touched.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.
- Covering arms and legs even when hot.
- Depression or moods that are out of character with the pupil's general behaviour.
- Unnaturally compliant behaviour towards parents or carers.

2.2 Emotional Abuse

Physical signs to look out for:

- A failure to grow or to thrive (particularly if the pupil thrives when away from home).
- Sudden speech disorders.
- Delayed development, either physical or emotional.

Behavioural signs to look out for:

- Compulsive nervous behaviour such as hair twisting or rocking.
- An unwillingness or inability to play.
- An excessive fear of making mistakes.
- Self-harm or mutilation.
- Reluctance to have parents contacted.
- An excessive deference towards others, especially adults.
- An excessive lack of confidence.
- An excessive need for approval, attention and affection.
- An inability to cope with praise.

2.3 Sexual Abuse

Physical signs to look out for:

- Pain, itching, bruising or bleeding in the genital or anal areas.
- Any sexually transmitted disease.

- Recurrent genital discharge or urinary tract infections without apparent cause.
- Stomach pains or discomfort when the pupil is walking or sitting down.

Behavioural signs to look out for:

- Sudden or unexplained changes in behaviour.
- An apparent fear of someone.
- Running away from home.
- Nightmares or bed-wetting.
- Self-harm, self-mutilation or attempts at suicide.
- Abuse of drugs or other substances.
- Eating problems such as anorexia or bulimia.
- Sexualised behaviour or knowledge in young pupils.
- Sexual drawings or language.
- Possession of unexplained amounts of money.
- The pupil taking a parental role at home and functioning beyond their age level.
- The pupil not being allowed to have friends (particularly in adolescence).
- Alluding to secrets that they cannot reveal.
- Telling other pupils or adults about the abuse.
- Reluctance to get undressed for sporting or other activities where changing into other clothes is normal.

2.4 Neglect

Physical signs to look out for:

- Being constantly hungry and sometimes stealing food from others.
- Being in an unkempt state; frequently dirty or smelly.
- Loss of weight or being constantly underweight.
- Being dressed inappropriately for the weather conditions.
- Untreated medical conditions – not being taken for medical treatment for illnesses or injuries.

Behavioural signs to look out for:

- Being tired all the time.
- Frequently missing school or being late.
- Failing to keep hospital or medical appointments.
- Having few friends.
- Being left alone or unsupervised on a regular basis.
- Compulsive stealing or scavenging, especially of food.

2.5 Signs which may suggest FGM:

- A pupil may talk about a special procedure or ceremony that is going to take place
 - Prolonged absence from the setting/school
 - Change in behaviour on return
 - Damage to the genital area and/or adjacent tissues
 - Pain or difficulty in sitting
 - Bleeding or infection
 - Urine retention
 - Fracture or dislocation as a result of restraint
 - Psychological damage, including depression, anxiety, and sexual dysfunction.
- More information regarding FGM can be found on the London Safeguarding Children Board website.

2.6 Domestic abuse: signs which may suggest pupils are exposed to domestic abuse:

- Aggressive behaviour
- Displaying anti-social behaviour
- Acting out their experiences
- Suffering from depression or anxiety
- Not achieving potential - due to difficulties at home or disruption of moving to and from refuges.

2.7 Child Criminal Exploitation (CCE): signs which may be indicators of a pupil exposed to CCE:

- Unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Changes in emotional wellbeing
- Misuse of alcohol and drugs
- Missing for periods of time, or regularly home late
- Skipping school or being disruptive
- Regularly missing from school or education, or not taking part in education

2.8 Child Sexual Exploitation: the above CCE indicators can also be indicators of CSE, as can:

- Older boyfriends or girlfriends
- Experiencing health problems that may indicate a STD.
- Having mood swings and changes in temperament or suffer from changes in emotional well-being
- Displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting")
- They may also show signs of unexplained physical harm, such as bruising and cigarette burns.

Appendix 3 - Child-on-child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable and they will not be tolerated. They should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

If any members of the School community have **any** concerns regarding child-on-child abuse, they should speak to the DSL/DDSLs who will follow the guidance outlined in *KCSiE 2024* in their response. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion in accordance with the procedures in this policy. Managing situations where children have been abused by other children can be complex and stressful.

The Trust takes steps to minimise the risk of all types of child-on-child abuse. Staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. The Trust has robust anti-bullying procedures in place (**see the School’s Anti- Bullying Policies**), and pupils are taught acceptable behaviour and how to keep themselves safe as part of the PSHE and Life Skills programmes. Appropriate action is taken to protect those pupils identified as being at risk, including the particular vulnerabilities of those with a special educational need or a disability. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. If needed, a pupil safety plan is implemented.

Sexual Violence

‘Sexual violence’ refers to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Consent: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Sexual harassment

‘Sexual harassment’ means ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of School and, in the context of this policy, is referred to in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. When considering whether this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

Sexual harassment will be considered in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

It is effective safeguarding practice for the DSL (and the DDSs) to have a good understanding of HSB. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole School approach to safeguarding.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

The School is aware of the importance of:

- making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Youth produced sexual or indecent imagery

Indecent imagery is the legal term used to define nude or semi-nude images, videos or live streams of children and young people under the age of 18. This could be via social media, gaming platforms, chat apps or forms. Consensual and non-consensual sharing of nude images and/or videos can be signs that children are at risk.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive. The School follows the guidance given by the *UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people*.

The School treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

Members of staff should not view sexual imagery which is reported to them, or copy, print, share, store or save the images. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others. All child-on-child abuse is unacceptable and will be taken seriously.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

The immediate response to a report

Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The initial response to a report from a child is very important. The response to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

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 the School should not be downplayed and should be treated equally seriously. A victim should 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 to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- informing the DSL (or DDSL), as soon as practically possible, if the DSL (or DDSL) is not involved in the initial report.

All staff are trained to manage a report.

Effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the DSL or a DDSL)
- careful management and handling of reports that include an online element. The key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
- recognising that a child is likely to disclose to someone they trust: this could be anyone on the School staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child

- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present)

Other considerations, including considerations around confidentiality and Risk Assessments, are covered in *KCSiE*.

Action following a report of sexual violence and/or sexual harassment

The DSL/DDSL will make an immediate risk and needs assessment, considering:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s); and
- all the other children, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

The DSL/DDSL will contact children's social care, CAMHS, and police as appropriate in respect of the children concerned. The interests of the identified victim must always be the paramount consideration.

Where the allegation relates to an incident that took place within the School, or relates to other pupils attending the School, the School will take all appropriate action to ensure the safety and welfare and continued education of all pupils including the alleged perpetrator. A pupil against whom an allegation of abuse has been made may be suspended from the Trust during the investigation and the Trust's policy on behaviour, discipline and sanctions will apply. Both victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed.

The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated.

In deciding the School's response, it will be important to consider the following factors:

- the nature of the alleged incident(s), including whether a crime may have been committed
- the ages and developmental stages of the children involved
- the wishes of the victim in terms of how they want to proceed. With 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.
- Whether the alleged abuser is supported or joined by other children

- Any differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of victim)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

The School will take advice from children's social care and / or the police, as appropriate, on how the investigation of such allegations will be conducted. This advice will help determine whether the matter is managed internally, referred to early help, formally referred to children's social care, or reported to the police. If, following the advice of children's social care/the police, the matter is handled internally, the response should be underpinned by the principle that sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, decisions and reasons for decisions should be recorded.

Appropriate support will be provided to all pupils involved by the School's pastoral team, and pupils may be referred to the School's counselling services. Support from external services will be requested as necessary. This support will be provided to both victims and alleged perpetrators.

Appendix 4 - The Prevent Duty: preventing radicalisation and extremism

The Prevent Duty: from 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA 2015”), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent Duty. Schools must have regard to statutory guidance issued under section 29 of the CTSA 2015 (“the Prevent guidance”). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools (but also cover childcare). The statutory Prevent guidance summarises the requirements by schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children and young people at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Partnerships.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the School of being drawn into terrorism. As a minimum, however, schools should ensure that the DSL undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children and young people from the risk of radicalisation.
- Schools must ensure that children and young people are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place; it is also important that schools teach pupils about online safety more generally.
- Schools must ensure all visiting speakers are suitable and appropriately supervised. The procedures to be followed when visiting speakers are invited to School are outlined in **Appendix 7** of this policy.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

The Channel Programme: Channel is a voluntary, confidential programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. Schools and colleges that are required to have regard to *Keeping Children Safe in Education* are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

Indicators: (this is not an exhaustive list and vulnerability may manifest itself in other ways)

Vulnerability

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them.
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends.
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life.
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, involvement with criminal groups.

Access to extremism / extremist influences

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - because either they associate directly with known individuals, or because they frequent key locations where these individuals are known to operate?
- Is there evidence to suggest that they are accessing the internet for the purpose of extremist activity or that they possess extremist literature?
- Is there reason to believe that the child/young person has been, or is likely to be, involved with extremist/ military training camps/ locations?
- Does the young person sympathise with, or support illegal/illicit groups or articulate support for extremist causes or leaders?

Experiences, Behaviours and Influences

- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK? Does the young person vocally support terrorist attacks, either verbally or in their written work? Do they justify the use of violence to solve societal issues? Do they use extremist narratives and a global ideology to explain personal disadvantage?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict.
- Has there been a significant shift in the young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Has the young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?
- Is there a pattern of regular or extended travel within the UK or abroad, with other evidence to suggest that this is for purposes of extremist training or activity, or to locations known to be associated with extremism?

Social Factors

- Does the young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the young person have any learning difficulties/ mental health support needs?
- Is the young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Is there evidence that a significant adult or other in the young person's life has extremist view or sympathies?

Appendix 5 - Guidance for Staff, Governors and Volunteers on Suspecting or Hearing a Complaint of Abuse

1 Action staff, Governors and volunteers must take

- 1.1 A member of staff, governor or volunteer suspecting or hearing a complaint of abuse:
 - 1.1.1 must listen carefully to the child and keep an open mind. The individual receiving the disclosure should not take a decision as to whether or not the abuse has taken place;
 - 1.1.2 must not ask leading questions, i.e. a question which suggests its own answer;
 - 1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The individual receiving the disclosure should explain that they need to pass the information to the applicable DSL who will ensure that the correct action is taken; and
 - 1.1.4 must keep a sufficient written record of the conversation using a Log of Concern About a Pupil's Safety and Welfare (Appendix 9). The record should include:
 - (a) the date and time;
 - (b) the place of the conversation; and
 - (c) the essence of what was said and done by whom and in whose presence.
- 1.2 The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the DSL as soon as possible.
- 1.3 All evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to a DSL.
- 1.4 All suspicions or complaints of abuse must be reported to the DSL as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 5 should be followed. Any member of staff is able to make a referral directly to children's social care: they are not required to report via the DSL or DDSLs. **If there is a risk of immediate serious harm to a child and it is not possible to report to DSL, a referral should be made to children's social care immediately.**

Staff must be persistent in making referrals, and when they feel appropriate action has not been taken by the statutory agencies this should be recorded.

Appendix 6 - Dealing with allegations or concerns about members of staff, The Headmaster, Governors or volunteers

The School's actions will be informed by reference to the Statutory Guidance from the Department for Education contained in Part 4 of *KCSiE September 2024*.

All Trust staff should take care not to place themselves in a vulnerable position with a child. Guidance is given in the **Staff Behaviour Policy**.

The Trust's procedures for dealing with allegations and concerns are enacted where the behaviour of a member of staff (including volunteers, supply staff and agency staff), The Headmaster, a Governor or volunteer meets any of the following criteria:

An allegation means an allegation that a staff member, volunteer or Governor has:

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

Allegations/concerns that do not meet the harms threshold, hereafter referred to as 'low level concerns'.

A low level concern does not mean that it is insignificant, it means that the behaviour towards child does not meet the threshold of an allegation. "A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

Examples of such behaviour could include, but are not limited to:

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

All allegations and concerns will be taken seriously and a full procedure for dealing with such allegations can be found below.

Procedures Following an Allegation or Concern About a Member of Staff, The Headmaster, a Governor or a Volunteer's Behaviour Towards a Child

1. Reporting an allegation or concern about a member of staff, The Headmaster, a Governor or a volunteer:

- Allegations/concerns about any member of staff (including the DSL or DDSL), or volunteer at Hampton School should be immediately reported to The Headmaster of the Hampton School Trust or in his absence to the Chair of Governors (chair@hamptonschool.org.uk). Where appropriate, The Headmaster will consult with the DSL. The allegation will be discussed immediately with the LADO and within one working day before further action is taken.
- Allegations/concerns about any member of staff (including the DSL or DDSL), or volunteer at HPP&P should be immediately reported to the Hampton Pre-Prep & Prep Headmaster, or in his absence, to The Headmaster, Hampton School Trust, or in his absence to the Chair of Governors. The allegation will be discussed immediately with the LADO and within one working day before further action is taken.
- If the allegation/concern relates to The Headmaster, the Pre-Prep & Prep Headmaster or a Governor, the Chair of Governors should be informed (chair@hamptonschool.org.uk) without notifying The Headmaster or the Pre-Prep & Prep Headmaster. Again, the allegation/concern will be discussed immediately with the LADO before further action is taken.
- Where there is a conflict of interest in reporting a matter to The Headmaster, this should be reported directly to the LADO.
- If it is not possible to report to The Headmaster, Hampton Pre-Prep & Prep Headmaster or Chair of Governors in the circumstances set out above, a report should be made immediately to the relevant DSL. The DSL will act in accordance with these procedures and will, as soon as possible, inform The Headmaster, Hampton Pre-Prep & Prep Headmaster or, where appropriate, the Chair of Governors.
- All allegations/concern about the Chair of Governors should be reported to the LADO without the Chair of Governors being informed.
- The person acting in accordance with the procedures in this Appendix is known as the 'case manager'. Low level concerns will be handled as set out below in paragraph 8.
- In all cases, if the behaviour meets the established criteria of an allegation (see above), the case manager will contact the LADO without delay (within one working day). Advice from the LADO will be sought in borderline cases. In cases of serious harm, the police will be involved from the outset. The Trust will not undertake its own investigation until after advice is sought from the LADO. Where an allegation relates to a member of supply staff (or contractor) provided by an agency, the agency should be fully involved after the matter is reported to the LADO. Parental consent is not required before reporting allegations to the LADO.
- Discussions with the LADO will consider the nature of the allegation and decide a course of action. Discussions should be recorded in writing.
- Any allegations not meeting this criterion will be dealt with in accordance with the Kingston and Richmond Safeguarding Children Partnership procedures.

2. The Local Authority Designated Officer (LADO):

The LADO can be contacted on 020 8891 7370; 07774 332675/07936 601423, LADO@achievingforchildren.org.uk

The LADO should initially be contacted via Richmond and Kingston Single Point of Access (SPA): 020 8547 5008 or 020 8770 5000 for out of hours; email: spa@richmond.gov.uk

3. Disclosure of information

- The Trust will observe the reporting restrictions that prevent the identification of a teacher who is subject to an allegation. The Trust has a duty of care towards its employees and unless advised otherwise by outside agencies, the Trust will inform the person against whom the allegation has been made as soon as possible after the LADO has been consulted and they will be kept informed of developments.
- Parents or guardians of a child concerned will be told about the allegation as soon as possible, if they do not already know, and will be kept informed of the progress of the case, including the outcome, but not the details of any disciplinary process.
- Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

4. Further action to be taken by the Trust

- A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The Trust will act in accordance with Part 4 of *Keeping Children Safe in Education 2024* and the Trust's employment practices and procedures.

5. Ceasing to use staff

- If the Trust ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service (DBS) will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the Trust, with a report being presented to the Governors without delay.
- If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the Trust in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- Where a teacher has been dismissed for serious misconduct or would have been dismissed had he / she not resigned (including by or from an agency), separate consideration must be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made. **Contact details for the DBS and TRA can be found on page 4.**

6. Unsubstantiated, false or malicious allegations

- If a report is shown to be deliberately invented or malicious, the School should consider whether any disciplinary action is appropriate against the individual who made it as per the School's own disciplinary and behaviour policies in place from time to time.

- For example - where an allegation by a pupil is shown to have been deliberately invented or malicious, the applicable Headmaster will consider whether to take disciplinary action in accordance with the Trust's behaviour and discipline policies.
 - Where a parent has made a deliberately invented or malicious allegation, the applicable Headmaster will consider whether to require that parent to withdraw their child or children from the Trust on the basis that they have treated the Trust or a member of staff unreasonably (in accordance with the Trust's Terms and Conditions).
 - Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the Trust reserves the right to contact the police to determine whether any action might be appropriate.

7. Record keeping

- Details of allegations found to be malicious will be removed from personnel records.
- For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer.
- An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.

8. Low Level Concerns

The aim of the Safeguarding Policy is to facilitate a culture in which the values and expected behaviours, which are set out in the Trust's Staff Behaviour Policy, are practiced and reinforced by all staff. This is consistent with *Working Together to Safeguard Children, July 2018* which states "Children are best protected when professionals are clear about what is required of them individually and how they need to work together". For further guidance see the **Low Level Concerns Policy, which is found in full in Appendix 10 of this policy** and which can be downloaded from Cezanne.

The Low Level Concerns form can be found by following the links below:

Hampton School - [click here](#).

HPP&P - [click here](#) (Safeguarding folder)

Appendix 7 - Visiting Speakers

VISITING SPEAKER FORM

The Trust is required to maintain a register of all Visiting Speakers, i.e. visitors to the Trust who give talks, seminars, practical workshops etc. We need to ensure all speakers are suitable and appropriately supervised.

Members of staff organising the visit must complete and submit this form for every visiting speaker, no later than one week prior to the proposed visit. It should be passed to either JOM or PZM at Hampton School (TH or IM at HPP&P).

Staff responsible for a Visiting Speaker are reminded that all visitors to the Trust must be:

- Signed in and out and badged at Reception on arrival and their ID checked;
- Collected from Reception by a member of staff;
- Supervised at all times while on the School site by the member of staff responsible for the visit. In particular, Visiting Speakers must never be placed in a position of being alone with pupils.

Please complete the following for all visiting speakers:

Name of Visiting Speaker	
Organisation the visiting speaker works for/represents	
Subject/title of the talk/lecture/workshop	
Will they be using online platforms (e.g. Mentimeter)? Please discuss with a member of SLT before agreeing with the speaker.	
Member of staff responsible for visit	
Date of Visit: Timings of Visit	
Year Group/Class	
Please confirm that the Visiting Speaker will be accompanied at all times by a member of staff will not be placed in a situation where he/she is a one to one situation with a pupil	

Name..... (Please print)

Signed.....

Date.....

To be completed by JOM or PZM at Hampton School or TH or IM at HPP&P

Approval is given for the talk/lecture/workshop: Yes/No

A risk assessment is required? Yes/No

Signed..... Date.....

This form can be downloaded from SharePoint:
[Click here](#) for Hampton School. [Click here](#) for HPP&P.

Appendix 8 - Related School Policies

- Anti-Bullying Policy
- Behaviour, Rewards, Sanctions, Discipline and Exclusions Policy (or the Policy to Promote Good Behaviour – Rewards – Sanctions – Exclusions at HPP&P)
- Dealing with Allegations of Against Staff or Volunteers Policy (**Appendix 6**)
- E-Safety Policy
- Health and Safety of Pupils on Educational Visits Policy (or HPP&P's separate Educational Visits Policy)
- Looked After Children Policy
- Mental Health Policy
- Missing Pupil Policy (or HPP&P's Missing / Lost Child Policy)
- Low Level Concerns Policy
- Recruitment, Selection and Disclosure Policy
- Staff Behaviour Policy
- Whistleblowing Policy

Appendix 9 - Log of a Concern about a Pupil's Safety and Welfare

LOG OF A CONCERN ABOUT A PUPIL'S SAFETY AND WELFARE

Pupil's Name:	D.O.B.	
Date:	Time:	
Name of person raising concern:
Print	Signature	
Position in School:		
Note the reason(s) for recording the incident:		
Record the following factually:	Who?	
	What?	
	Where?	
	When?	
Offer an opinion where relevant (how and why might this have happened?)		
Substantiate the opinion. Note any action taken, including names of anyone to whom your information was passed.		

Appendix 10 - Low Level Concerns Policy

Introduction

This policy applies to the Hampton School Trust (the Trust or the School), which comprises Hampton School and Hampton Pre-Prep & Prep School (HPP&P), for children from the Early Years Foundation Stage (EYFS) to the Upper Sixth Form.

As part of their whole school approach to safeguarding, schools should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including Governors, supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. (See Part Four, section one of Keeping Children Safe in Education 2024 (*KCSiE 2024*) and Appendix 5 of the Hampton School Trust **Safeguarding Policy** for how to deal with allegations that might indicate a person will pose a risk of harm if they continue to work with children).

All policies referred to in this policy can be accessed via Cezanne as follows:

Hampton School : [click here](#)

HPP&P : [click here](#)

A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the **Staff Behaviour Policy**, including inappropriate conduct outside of work. The term ‘low level’ concern does not mean that it is insignificant. Early identification and prompt management of all concerns about the behaviour of adults who work or volunteer with children is critical to effective safeguarding. *KCSiE 2024* requires low level concerns to be shared.

Staff are required to share low level concerns in this way:

- To ensure there is a formalised mechanism for reporting low level concerns;
- To allow staff to self-report to the School to protect themselves in situations where they may have found themselves compromised;
- To identify patterns of behaviour that are concerning; and
- To ensure the School continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

Staff should therefore

- a) **report any behaviour by another adult** towards a pupil or another child that may have concerned them
- b) **self-report** in any situation where they feel their behaviour towards a pupil, or another young person could be misinterpreted or misconstrued or leave them vulnerable

Concerns regarding the behaviour of another adult towards a child

A low level concern report should be used when a member of staff is concerned about the behaviour of another adult towards a pupil or another child. This is not just where it is clear that a professional boundary has been broken: anything which causes staff to have a ‘nagging doubt’ about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate.

Examples of such behaviour could include, but are not limited to:

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

Self-reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Trust's **Staff Behaviour Policy**.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

Almost always, there will be a perfectly innocent explanation for what has occurred, and staff should not feel awkward about making a report or being the subject of a report. Reporting these types of concerns is a neutral act and the Designated Safeguarding Lead (DSL) – Mr Owen Morris (Deputy Head) or Ms Tammy Howard (at HPP&P), or the Deputy Designated Safeguarding Leads (DDSL's) – Ms Pippa Message (Deputy Head) and Mr Mark Nicholson (Deputy Head) at Hampton, or Mrs Imogen Murphy at HPP&P - will, on receiving a report, decide how to best approach the concern raised.

A member of staff who makes a low level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the **Whistleblowing Policy**. Some of the circumstances in which staff must make a low level concern report might be:

- any incident where s/he feels his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- any adult being overfriendly with pupils, allowing first names to be used, or encouraging the use of nicknames of staff or pupils; .
- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (School medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons, etc;
- any incident where a staff member has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any social contact with pupils outside of School (other than planned/authorised events, educational visits or trips, or insignificant incidents such as passing a pupil in the street or in a shop or noticing they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;
- if a pupil becomes aware of and/or uses a staff members home address, mobile or home phone number, or non-school e-mail address other than in line with agreed protocols;
- the fact of, and explanation for, any one-to-one contact with a pupil on School trips, particularly if this takes place in a private space such as a bedroom;
- non-trivial illnesses or accidents of pupils on School trips;
- any incident where, for whatever reason, a member of staff has not complied with the **Staff Behaviour Policy**.

This is not an exhaustive list. Staff who are unsure of whether to complete a neutral notification are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made.

Hampton School

Sharing a low level concern – the process

Low level concerns should be reported to the DSL. Alternatively, reports can be made to those members of SLT who are also DDSL's, who will pass these reports to the DSL. All reports will be shared by the DSL with The Headmaster.

Where the low level concern relates to The Headmaster, or where there is a conflict of interest in reporting the matter to The Headmaster, **this should be reported directly to the Chair of Governors** (chair@hamptonschool.org.uk).

Low level concerns can be made in person, but staff are also encouraged to use the email address: lowlevelconcerns@hamptonschool.org.uk. Alternatively, they can download a Low Level Concerns Form (**Appendix 1 of this Low Level Concerns policy**) which is available via SharePoint - [Safeguarding \(Low Level Concerns form\)](#) - and send it to the email address above once completed.

Recording low level concerns

All low level concerns should be recorded in writing by the DSL. The record should set out the details of the concern, the context in which the concern arose and action taken. The name of the individual sharing their concerns should also be noted but if the individual wishes to remain anonymous that should be respected as far as possible. Records will be held securely by the DSL on a password protected file.

Low level concerns will be shared with The Headmaster. The Headmaster and DSL will review the records so that potential patterns of concerning problematic or inappropriate behaviour can be identified. They will consider whether the reported matter is a low level concern and whether it should be reclassified as an allegation and dealt with as outlined in **Appendix 4 of the Safeguarding Policy**. Where there is in any doubt whatsoever about the classification of a reported concern, The Headmaster, or DSL (as appropriate) will seek advice from the Local Authority Designated Officer (LADO) on a no-names basis.

Having established that the concern is low level, The Headmaster or DSL (as appropriate) will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the low level concern has been raised by a third party, in the investigation The Headmaster or DSL will speak to the individual who raised the concern, to any witnesses and to the person involved. Most low level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. This might lead to internal disciplinary procedures, referral of an individual to the LADO or the consideration of amendments to other policies and procedures that could be revised to minimise further risks.

Hampton Pre-Prep & Prep School

Sharing a low level concern – the process

Low level concerns should be reported to the Hampton Pre-Prep & Prep Headmaster or the Designated Safeguarding Lead (DSL).

Where the low level concern relates to the Hampton Pre-Prep & Prep Headmaster, or where there is a conflict of interest in reporting the matter to the Headmaster, **this should be reported directly to The Headmaster of the Trust.**

Low level concerns can be made in person, but staff are also encouraged to use the email address: lowlevelconcerns@hamptonprep.org.uk.

A Low Level Concerns form can also be downloaded from Cezanne - [click here](#) (Safeguarding folder).

Recording low level concerns

Low level concerns at HPP&P will be dealt with in the same way as described above, but by the HPP&P DSL and the Hampton Pre-Prep & Prep Headmaster.

Low Level Concerns Form (Appendix 1)

This form should be used to **share any concern** – even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with the Hampton School Trust **Staff Behaviour Policy**, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

The form can be downloaded from the relevant area:

Hampton School - [Safeguarding \(Low Level Concerns form\)](#)

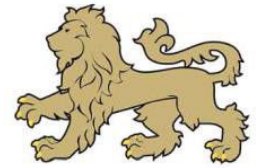
HPP&P - [Low Level Concerns form](#) (in Safeguarding folder)

Once completed, staff should send the form to the appropriate email address for either Hampton School or HPP&P.

Staff should also **self-report** if they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leaves them vulnerable.



HAMPTON SCHOOL TRUST



Low Level Concern Form

Please use this form to **share any concern** – even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with the Hampton School Trust **Staff Behaviour Policy**, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Staff should also **self-report** if they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leaves them vulnerable

Please provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

Details of concern:

Signed:.....

Name:..... Date:.....

Appendix 11 - Safeguarding Summary Sheet – Weekends and Out-of-Hours

All staff who work after the School day has ended, or at the weekends, need to be aware of their safeguarding responsibilities, as well as understanding the procedures to follow if they have concerns.

If a child wants to speak to a member of staff, these are the main guidelines to follow:

- Listen to the child and be supportive
- **Never promise confidentiality**
- If they mention anything that raises concerns about their safety or the safety of other children, report it to the Safeguarding staff (see below)
- Do not contact parents until it has been discussed with the Safeguarding staff

What to look out for: there isn't a complete list, but common concerns would be if a pupil:

- Behaves unusually
- Appears distressed, confused or disturbed
- Does not want to go home
- Is left on their own at School

If you are concerned about the behaviour of an adult:

All staff are required to report any concern or allegation about the behaviour of colleagues which is likely to put pupils at risk of abuse or other serious harm. There will be no retribution against the reporter (covered by the Whistleblowing Policy and the NSPCC whistleblowing helpline – 0800 028 0285).

Please report low level concerns too; this is when an adult may have acted in a manner inconsistent with the Staff Behaviour Policy or there is unease about the adult's behaviour towards, or around, children. Concerns about staff conduct should be reported to The Headmaster – headmaster@hamptonschool.org.uk.

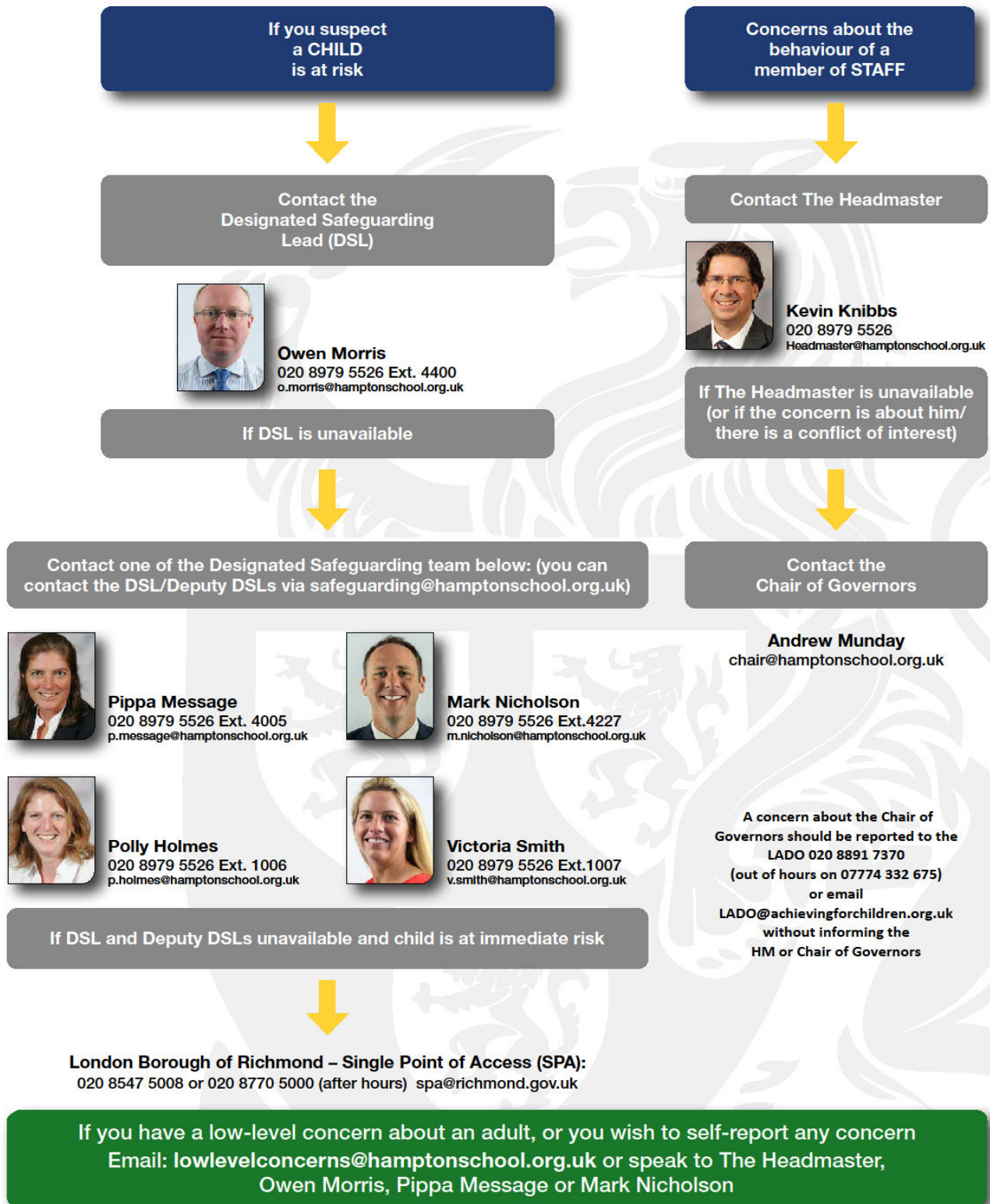
What to do if you suspect that a child is at risk of harm:

Contact one of the Designated Safeguarding staff:

- **Owen Morris** (Designated Safeguarding Lead - DSL) or **Pippa Message, Mark Nicholson, Polly Holmes or Victoria Smith** (Deputy Designated Safeguarding Leads - DDSL)
- **Phone:** to contact a member of the Safeguarding staff at weekends or after the School day has ended, **please use the keepers' mobile phone (07825 428681)** which holds key staff mobile numbers.
- **For Hampton Pre-Prep & Prep** – contact **Tammy Howard (DSL)** or **Imogen Murphy (DDSL)** - **please use the Keepers' mobile phone (07825 428681)**
- **E-Mail:** safeguarding@hamptonschool.org.uk
- **Contact Mike King (Bursar) or Verity Moria (Deputy Bursar)** – they will be able to provide advice/contact others - **please use the keepers' mobile phone (07825 428681)**
- **Contact the appropriate authorities yourself.** In most cases, staff should pass on concerns about a child to the Safeguarding staff; however, you should be aware that everyone who works with children shares a responsibility for ensuring children are safe: anyone can make their own referral to the Local Authority and must do so if a child is in risk: **Richmond Single Point of Access (SPA) - 0208 547 5008 (out of hours 0208 770 5000); email: spa@richmond.gov.uk**
- In an emergency dial 999



SAFEGUARDING REPORTING SUMMARY FOR STAFF



Appendix 13 - Safeguarding Reporting Summary for Staff (Hampton Pre-Prep & Prep)



HAMPTON
PRE-PREP & PREP SCHOOL

**SAFEGUARDING
REPORTING SUMMARY
FOR STAFF**

