

Child Protection (Safeguarding) Policy

This policy applies to all pupils in Ealing Independent College.

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Bellevue Safeguarding Governor	Gregg Davies
Education Directors with Safeguarding Responsibility	Steven Wade, David Williams
Principal	Allan Cairns:
allan.cairns@ealingindependentcollege.com	
Designated Safeguarding Lead (DSL)	Laura Bellerby:
laura.bellerby@ealingindependentcollege.com	
Deputy DSL (DDSL)	James Garside:
james.garside@ealingindependentcollege.com	

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Ealing Independent College Child Protection (Safeguarding) Policy

1. INTRODUCTION

Ealing Independent College fully recognises its responsibilities for Child Protection. Every pupil should feel safe and protected from any form of abuse. This is defined in this policy as any kind of neglect, non-accidental physical injury, sexual abuse and sexual exploitation or emotional ill treatment.

This policy applies to all teaching and non-teaching staff and volunteers, is available on

Ealing Independent College's website and is available to parents on request. It applies to all areas of Ealing Independent College.

The governors and proprietors will ensure they facilitate a whole school or college approach to safeguarding. Thus ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the governors, proprietors and school or college leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

This policy has been written in accordance with:

- i. the DfE guidance document 'Keeping Children Safe in Education' (KCSIE September 2023), the updated guidance provided in the document 'Working Together to Safeguard Children' (July 2018) (WTSC) and 'Early years and later years (under-8's) childcare - Disqualification under the Childcare Act 2006' (March 2015), as amended in July 2018.
- ii. Locally agreed inter-agency procedures; Ealing Independent College will participate as appropriate in 'common assessment framework' (CAF) or the 'team around the child' (TAC) approaches, or a 'co-ordinated offer of early help', in accordance with WTSC. Where students are in the London Borough of Ealing, this will be the Ealing Multi Agency Safeguarding Hub (MASH)
- iii. Ealing Independent College recognises the importance of early help in school (see section 4, Procedures) and the difference between a concern and a child in immediate danger; in each case the DSL will work in accordance with WTSC 2015 and the LSCB referral thresholds.

Safeguarding Statement

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interest** of the child. Anyone can make a referral, which will usually be to Ealing Independent College's DSL, but can be directly to Children's Social Care, if necessary.

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Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment;
 - preventing impairment of children's mental and physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
- (KCSIE Sept 2023)

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or

being threatened this could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Ealing Independent College aims to:

- Ensure safe recruitment practices in checking the suitability of staff and volunteers to work with children.
- Raise awareness of the potential for Sexual violence and sexual harassment between children in schools and colleges.
- Raise awareness of child protection issues and equip children with the skills needed to keep them safe.
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse.
- Support a pupil who has been abused in accordance with his or her agreed child protection plan.
- Maintain a safe environment in which children can learn and develop. • Communicate readily with LASCBS whenever an allegation or disclosure of abuse has been made.

Ealing Independent College endeavours to provide a strongly supportive pastoral environment, in which children have a range of adults to whom they can turn, should they have a concern. These include the class teacher, tutor, school counsellor and Vice Principal, who has overall responsibility for pastoral care. Details of helplines are also available.

Governors (Education Directors) are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

2. SAFE RECRUITMENT

Ealing Independent College recognises the importance of following recruitment and selection procedures on the appointment of employees and volunteers which help to deter, reject or identify people who might abuse children, or are otherwise unsuited to work with them. Recruitment procedures are carried out in accordance with guidance given in 'KCSIE (September 2023)'.

To ensure safer recruitment, the procedures are designed to:

- Scrutinise applicants
- Verify identity. (Best practice is with the use of birth certificates (where available) to check identity). Further identification checking guidelines can be found here • Verify academic or vocational qualifications
- Obtain professional and character references
- Check previous employment history
- Ensure that a candidate has the health and physical capacity for the job • Incorporate a face-to-face interview
- Include a barred list and Disclosure and Barring Services (DBS) check that can be accessed via the TRA's prohibition, restriction and barred list checks. See Teachers' Services Website
- Applicants from overseas must be subject to a DBS check and also include an overseas check equivalent to the DBS check for staff appointed directly from

overseas see Page 72 KCSIE 2023

- Verify the applicant's right to work in the UK
- Include a prohibition order check (for those who undertake 'teaching work'*) and also an EEA prohibition check for staff appointed to do teaching work from the EEA other than England (see Safer Recruitment guidelines and checklist for further detail)
- Include a prohibition from management check (s 128) (For any staff taking up a management position in an independent school, academy, or in a free school as an employee; a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibility.
- Include, when required, a self-declaration in respect of the Childcare Disqualification Regulations.
- An online search of shortlisted candidates will be carried out.

* 'Teaching work': a definition is provided in The Teachers' Disciplinary (England) Regulations 2012 and cited at paragraph 234 in the ISI Regulatory Handbook. Ealing Independent College will judge each appointment on a case-by-case basis to determine whether the role includes 'teaching work'.

These procedures apply to all adults who may undertake a regulated activity (unsupervised) with the children in either a paid or voluntary capacity and any other staff where KCSIE requires checks to be undertaken. Ealing Independent College will verify that child protection checks and procedures listed above have been successfully undertaken for all staff employed by another organisation and who work with Ealing Independent College's pupils either at college or on another site. This applies, for example, to staff at a swimming pool or an outward bound activity centre and to visiting staff running activities or undertaking sports coaching, even where such staff are paid directly by the parents.

It is the responsibility of those who work or volunteer at Ealing Independent College, or with Ealing Independent College's pupils at a different venue, to inform the head immediately if, during the time of their engagement with Ealing Independent College, their circumstances change in such a way that they become disqualified from working in childcare, prohibited from teaching or in any other way barred from working with children.

Use of school or college premises for non-school/college activities

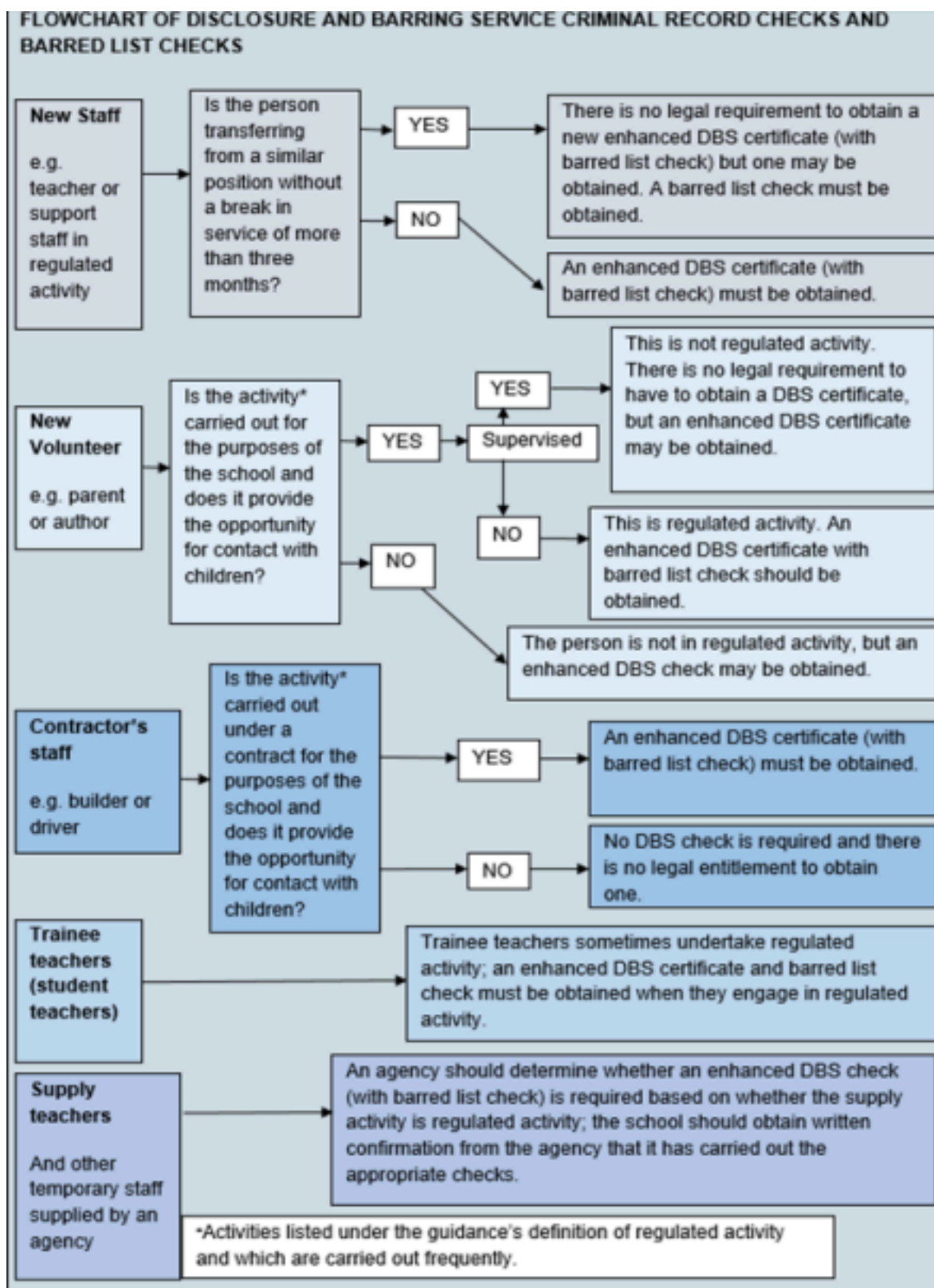
Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups,

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sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with Ealing Independent College or college on these matters where appropriate. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the

premises; and that failure to comply with this would lead to termination of the agreement.



Childcare Disqualification Regulations.

Guidance, available separately, has been published by Bellevue in relation to these requirements, covering disqualification from working in childcare. Ealing Independent

College will a) inform relevant staff and volunteers about the legislation, b) gather sufficient and accurate information about whether any member of staff in a relevant childcare setting is disqualified, and c) keep a record on the Single Central Register, including the date disqualification checks were completed. If a person is found to be disqualified, he or she will not be able to continue working in a role covered by the regulations. If appropriate, Ealing Independent College will consider a transfer to other duties. Ealing Independent College will inform Ofsted (and copy to ISI) if satisfied that a person working in a relevant setting falls within one of the disqualification criteria.

A copy of Ealing Independent College's 'safer recruitment guidelines and checklist' is available on request.

3. AWARENESS OF CHILD PROTECTION ISSUES

We recognise that, because of their day-to-day contact with children, staff at the school are well placed to observe the outward signs of abuse. Ealing Independent College will therefore

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to
- Ensure that children know there are adults in Ealing Independent College whom they can approach if they are worried or in difficulty
- Ensure that staff recognise Ealing Independent College's duties both to children in need and to children at risk of harm
- Include in the curriculum activities and opportunities for RSHE/PSHE which equip children with the skills they need to stay safe from abuse, including keeping safe online, and to know whom to turn to for help
 - The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed [here](#)
- Include in the curriculum material that will help children develop realistic attitudes to the responsibilities of adult life. We understand that we play a crucial role in preventative education and understand that it is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. We have a clear set of values and standards, upheld and demonstrated throughout all aspects of college life. It is underpinned by our student contract and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. It tackles at an age-appropriate stages 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, and
 - what constitutes sexual harassment and sexual violence and why these are

- Ensure all staff, including ancillary staff and representatives of the proprietors, receive comprehensive training on child protection issues, as specified by the local safeguarding children board (LSCB) in frequency and content, not less than every three years supplemented by informal updates as required, but at least annually.
- Ensure that all staff working directly with children have read and understand at least part 1 of KCSIE (September 2023); the understanding of staff will be secured by the following measures undertaken by Ealing Independent College
 - Safeguarding Induction Training which talks new staff through the content in a level of depth appropriate and proportionate to the person and their role - INSET Training
 - Reminders in Staff Meetings
 - Other means of probing understanding, such as the safeguarding governors' interviews with random staff at the annual Safeguarding Review
- Ensure that all school leaders and staff that work directly with children read Part 1 of KSCIE 2023 which deal with types of abuse and matters such as children missing education, child criminal exploitation (CCE), Child Sexual Exploitation (CSE), radicalisation, county lines and honour based abuse (including Female Genital Mutilation and Forced Marriage)
- Ensure that all school staff that are not directly working with children read the condensed part 1 at Annex B.
- Ensure that temporary and voluntary staff who work with children are made aware of the arrangements, based on a risk based approach – whereby Ealing Independent College assesses the level of detail with which such staff should be provided. In addition, all new staff and volunteers will receive training as part of their induction process, which will include an explanation of the systems to support Safeguarding. To ensure best practice, the DSLs for child protection will receive appropriate training, including in inter-agency working, every two years, supplemented by informal updates as required, but at least annually in accordance with locally agreed procedures and the requirements of KCSIE Annex B.

In order to ensure that new staff are fully aware of their duties regarding safeguarding, as part of the induction training for all staff, they will receive an explanation of:

- This safeguarding policy
- The staff code of conduct, which is in the staff handbook
- The student contract
- Ealing Independent College's safeguarding response to children missing education
- The role and identity of the DSL, and Deputy
- Ealing Independent College's approach to online safety

Additionally, at induction, staff must be provided with a copy of

- This safeguarding policy
- The staff code of conduct/behaviour policy (see 10, below in this policy)
- The Children Missing Education policy (contained within Appendix 1 of this policy)
- The role of the DSL and DDSL(s) (contained within this policy)
- Part 1 and Annex A of KCSIE (September 2023)
- The whistle-blowing policy

4. PROCEDURES

Ealing Independent College will follow the procedures set out by LASCB and take account of guidance issued by the Department for Education (DfE), as noted above. Links to

these documents can be found in Appendix 2, Guidance from KCSIE 2023, section 1 states that procedures should be followed where it is alleged that anyone working in

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Ealing Independent College or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child; • possibly committed a criminal offence against or related to a child; • behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, by showing transferable risk in another context e.g. mistreatment of vulnerable people in a care home.

In order to meet the aims of this policy, Ealing Independent College has the following measures in place:

Bellevue Governance ensures that Ealing Independent College has a DSL for child protection who has received appropriate training and support for such a role and a DDSL with a similar level of training to cover in the event of absence. In the event of the DSL being the subject of an allegation, Ealing Independent College's response will be co-ordinated by the DDSL, who will liaise with Safeguarding Governor or proprietor.

Steve Wade, Group Education Director for Bellevue Education Group, oversees safeguarding arrangements on behalf of the board of directors. Gregg Davies, Safeguarding Governor for Bellevue Education Group, is designated by the board to oversee and monitor Ealing Independent College's safeguarding policy and practice. In conjunction with David Williams, Education Director they conduct an annual Safeguarding Review of Ealing Independent College's child protection policy and procedures and of the efficiency with which the related duties have been discharged. As a result, any deficiencies or weaknesses in safeguarding arrangements will be remedied immediately. The reporting of arrangements for each school form part of the reporting process to the Education Committee, which includes Steven Wade, Gregg Davies and David Williams, which is responsible for the overall governance of Bellevue Schools.

Ealing Independent College ensures that every member of staff (including temporary and supply staff and volunteers) know and understand:

- The name of the DSL and DDSLs and their roles
- The responsibility of all staff to be alert to the signs of abuse and their responsibility for referring any concerns to the DSL.
- The procedures identified within Ealing Independent College policy.

Ealing Independent College ensures that parents have an understanding of the responsibility placed on Ealing Independent College and staff in relation to safeguarding and child protection, by publishing appropriate policies on Ealing Independent College's website.

Ealing Independent College ensures that members of staff are aware of the need to act on concerns about the welfare of a child immediately and to speak with the DSL or DDSL in accordance with this policy. Staff need to be alert to signs of abuse and know how to respond to a pupil who may tell of abuse. Ealing Independent College provides child protection training within the induction programme for all new staff and volunteers. The three-yearly training for staff is provided either by LASCBS, an external welfare agency acceptable to LASCBS, or those who are DSLs within Ealing Independent College and have up-to-date inter-agency training.

Ealing Independent College is committed to developing effective links with relevant agencies and cooperating as required with their enquiries regarding child protection matters. It is especially important that school understands its role in the three safeguarding partner arrangements (the local authority; a clinical commissioning group

of which falls) within the local authority area). Ealing Independent College will deal appropriately and immediately with every suggestion or complaint of abuse. Any allegation or suspicion of abuse, from within or outside Ealing Independent College, will be managed in accordance with this policy and, in all proper circumstances, will be referred to an external agency for investigation. Ealing Independent College will not undertake its own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can be held informally and without naming Ealing Independent College or individual.

For children in need, a referral will be made to Children's Social Care and for children at risk, a referral will be made to Children's Social Care immediately. They have a duty to respond. Staff should also be alert to any child who may benefit from an early help assessment. The DSL has responsibility to take the lead in matters of an early help assessment. In particular, staff should be alert to the potential need for an early help assessment for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- 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
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child.

Detailed information on early help can be found in Chapter 1 of WTSC 2015.

Mental Health

Ealing Independent College takes the mental health of its pupils seriously (and as such has 1 member of staff trained in Mental Health First Aid). All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

More information can be found in: [Mental health and behaviour in schools](#)

The DSLs and staff must be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Staff should

that might be critical in keeping children safe. The DfE guidance 'information sharing advice for safeguarding practitioners (see link in Appendix 2) supports staff who have to make decisions about sharing information.

Where there is a concern about a member of staff, the referral will be made to the local authority designated officer, or team of officers (LADO) within one working day. Other agencies may be contacted, such as the child protection unit of the police (CPU) or the NSPCC, in accordance with the procedures published by LASCB. If a crime has been committed, the matter will be reported to the police and, in cases of serious harm, the police will be informed from the outset.

When following up incidents, disclosures or allegations, staff will consider the welfare of all children. Where it is deemed necessary to speak with pupils, those involved will be offered the option of having another adult present. Where allegations are of a serious nature, parents or guardians will routinely be invited to attend, unless the allegation is of a nature where their presence may cause greater upset or jeopardise any possible police action.

Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; (noting the date, event and action taken)
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

On making a referral, Ealing Independent College can expect the local authority to make a decision within one working day about the type of response that is required, letting the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need, and should be assessed under section 17
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

Ealing Independent College should follow the matter up with the local authority if information is not forthcoming.

For further information on action to be taken in relation to safeguarding concerns staff can refer to the flowchart on page 22 of KCSIE 2023.

Ealing Independent College maintains and operates practices which promote this policy and which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations. In this respect, Ealing Independent College acknowledges the updated guidance provided in Part 4 of the DfE document KCSIE (September 2023).

Ealing Independent College ensures safe recruitment practices are carried out and that key staff have undertaken safer recruitment training, this needs to be renewed every five years. All interview panels will include at least one person who has undertaken such training.

Ealing Independent College takes all practicable steps to ensure that school premises are as secure as circumstances permit.

Ealing Independent College ensures that the duty of care towards pupils and staff is promoted, by raising awareness of illegal, unsafe and unwise behaviour and assists staff to monitor their own standards and practice.

Ealing Independent College has a culture of safety and reflective practice, where staff are valued and concerns can be raised, including about poor or unsafe practice and potential failures in Ealing Independent College's safeguarding regime. Its whistleblowing policy is available as part of the employment manual. Staff are made familiar with the policy through staff training. Whistleblowing is covered in Ealing Independent College's staff code of conduct and its programme of induction for new staff. The Whistleblowing Policy is available separately to those who work or volunteer at Ealing Independent College but are not employees of Ealing Independent College.

Ealing Independent College operates robust and sensible health and safety and fire protection procedures.

Ealing Independent College is alert to the medical needs of all children (particularly those with specific requirements).

Where an allegation against an individual not directly employed by Ealing Independent College, and where its disciplinary procedures do not fully apply, Ealing Independent College will ensure allegations are dealt with properly, including liaison with the LADO to establish a suitable outcome. Schools should seek the support of governance to establish appropriate steps. The agency responsible for the individual should be involved, although Ealing Independent College should lead, and ensure that the individual subject to the allegation receives appropriate support, either through union or colleague representation. The support of the LADO should be assisted to advise on information sharing. Ealing Independent College should ensure that agencies and their staff are aware of the procedures for managing allegations.

IN THE EVENT OF AN ALLEGATION OR A DISCLOSURE BY A CHILD, THE FOLLOWING WILL BE CONSIDERED:

a) INITIAL COMPLAINT

A member of staff suspecting, or hearing a complaint of, abuse:

- Must listen carefully to the child and keep an open mind.
- Must not take a decision as to whether or not abuse has taken place.

- Must not ask leading questions, that is, a question which suggests its own answer. "Use the TED Questions" formula below.
- Must reassure the child but not give a guarantee of absolute confidentiality.
- Must explain the need to pass the information to a DSL, who will ensure that the correct action is taken.
- Must keep a sufficient written record of the conversation. The record must include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials.
- Must keep the record secure and hand it to the DSL.

TED Questions:

Tell me about this

Explain what happened

Describe this to me

b) PRESERVING EVIDENCE

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

c) REPORTING

A member of staff needs only reasonable cause for concern in order to act. One sentence from the child, indicating abuse or non-accidental injury, provides staff with reasonable grounds and is sufficient for them to act. This may also apply if clear information comes from a sibling or another adult. However, as many of the signs of child abuse are also commonly associated with other medical, social or psychological problems, a member of staff may naturally wish to discuss some initial concerns with the DSL. All suspicion or complaints of abuse must be reported only to the DSL, or if it involves the DSL, to the DDSL, who will liaise with the head, (unless the head is the subject of the suspicion or complaint).

d) ACTION BY THE DSL:

The DSL will contact the LASCBS (this will be the Ealing Childrens' Integrated Response Service Consultation Line if the pupil is resident in Ealing) if he or she believes a child may be in need or at risk of significant harm and may follow this up with a written referral (this will be to the Ealing Children's Integrated Response Service if the pupil is resident in Ealing). If appropriate, the child may well be told what action is being taken and what will happen next. Allegations against someone in a position of trust are the only cases that must be reported to the LADO. If there is room for doubt as to whether a referral should be made, the DSL may consult with appropriate professionals on an informal basis.

The DSL's options for action include:

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

Action taken may also include:

- Sharing information with the head, safeguarding governor, schools director or DDSL
- Contacting the parents or carers
- Calling an internal pastoral meeting to discuss the situation – all appropriate persons would be invited (*e.g. form tutor, head of pastoral care, school nurse*). At this point a pastoral care plan may be instigated.

The action to be taken will take into account:

- Ealing Independent College's Child Protection (Safeguarding) Policy.
- The procedures published by LASCBS
- The nature and seriousness of the suspicion or complaint. Any complaint involving serious harm or a serious criminal offence will always be referred to the Safeguarding in Education Team (this will be the Ealing Childrens' Integrated Response Service if the pupil is resident in Ealing), the LADO (if the person under suspicion is in a position of trust) and the police without further investigation within Ealing Independent College.
- The wishes of the pupil, who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times, if the pupil is suffering or is a risk of suffering significant harm, when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes. The welfare of the child is paramount.
- The wishes of parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances.
- Any concern from the DSL that disclosing information to parents would put a child at risk. In this case, he or she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of Ealing Independent College community as a whole including its employees and its insurers.

e) REFERRAL GUIDELINES

When deciding whether to make a referral, following an allegation or suspicion of abuse, the head and DSL should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the Safeguarding in Education Team (if the pupil is resident in Ealing, this will be the Ealing Childrens' Integrated Response Service). This may be done tentatively and without giving names in the first instance.

What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus Ealing Independent College should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse. However, if sufficient concern develops that a child may be suffering or is at risk of suffering significant harm, a referral will be made without delay.

Contact will be made with the Safeguarding in Education Team ((if the pupil is resident in Ealing, this will be the Ealing Childrens' Integrated Response Service)) within 24 hours of a disclosure being made. If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours of the initial telephone call. If no response or acknowledgment is received within three working days, the DSL will contact the Safeguarding in Education Team (or equivalent body within your LA).

Contextual Safeguarding:

Safeguarding incidents and/or behaviours can be associated with factors outside Ealing Independent College and/or can occur between children outside Ealing Independent College. All staff, but especially the DSL or deputy need to consider the context within which such incidents and/or behaviours occur. Known as contextual safeguarding, this simply means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to the child's safety and/or welfare.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

f) ALLEGATIONS AGAINST STAFF, VOLUNTEERS OR THE HEAD

When dealing with allegations against the head, staff, supply staff or volunteers, Ealing Independent College aims to strike a balance between the need to protect children from abuse and the need to protect the head, staff, supply staff and volunteers from false or unfounded allegations. When deciding on whether to proceed Ealing Independent College should take note of the Harm Test.

Ealing Independent College will follow the guidance in Part 4 of KCSIE (September 2023).

Part 4 of KCSIE is now separated into two sections.

Section One includes detailed guidance on allegations which meet the harms threshold, and:

Section Two includes guidance for **low level concerns**. Even those concerns which do not meet the harms threshold should be shared with the right person and recorded and dealt with appropriately.

Low-level concerns

As part of our whole college approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of Ealing Independent College or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We work hard to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This should:

- encourage an open and transparent culture
- enable us to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of Ealing Independent College or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of Ealing Independent College or college.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. 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 Ealing Independent College 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 harm threshold or is otherwise not 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, contrary to school policy

- engaging with a child on a one-to-one basis in a secluded area or behind a closed

- door, or
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

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

Low level concerns about a member of staff should be reported to the Principal, or a member of the senior leadership team. Staff are also encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised Ealing Independent College's expected professional standards. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

The Principal will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.

The Head must record all low level concerns in writing, including details of:

- The concern,
- The context of the report,
- The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- Action taken and the rationale for this

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the pupil or pupils concerned and the need for a full and fair investigation. Where an allegation or complaint is made against the head, the DSL will report to and consult immediately with the Safeguarding Governor, relevant Education Director and/or proprietor, according to availability. This will be done without consultation with the head. The Safeguarding Governor or relevant Education Director will make immediate contact with the LADO.

Where an allegation or complaint is made against staff, volunteers or the DSL, the head will be informed or, in his/her absence, the Safeguarding Governor, relevant Education Director and/or proprietor.

If a decision is taken that a member of staff is suspended during the investigation Ealing Independent College recognises that this does not infer guilt. Under these circumstances any suspension is a 'neutral' act and no action should be viewed as an expression of opinion or judgement.

In the event of an allegation or complaint resulting in a member of staff being required not to come to school, because of suspension or other arrangements, where Ealing Independent College provides on-site accommodation for such a member of staff, he or she would be required to live off-site during this time. If it were not possible for offsite accommodation to be sourced by the member of staff, then Ealing Independent College would ensure suitable accommodation is provided.

In the event of any person (in any capacity, whether employed, contracted, a volunteer or student) leaving Ealing Independent College as a result of their being considered unsuitable to work with children, or who has harmed or poses a risk of harm to children,

Ealing Independent College will report this to the Disclosure and Barring Service (DBS) promptly, within one working week. This applies equally to anyone who would have been removed from Ealing Independent College had he or she not left earlier. Ealing Independent College recognises that the proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but do not have to find it from other sources.

A referral will be made to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons for such a referral include situations where the member of staff has been dismissed for unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. Ealing Independent College need only take this action if the matter has not been reported to the Disclosure and Barring Service; all matters reported to the DBS will be shared with TRA. A referral to the DBS would be undertaken on the advice of the LADO. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in 'Teacher misconduct: the prohibition of teachers (October 2015)'. Further guidance is published on the TRA website.

Ealing Independent College will follow the guidance in Part 4 of the DfE document KCSIE (September 2023) to ensure that:

- Procedures are applied with common sense and judgement (whereas before schools had to follow the required procedures closely)
- Allegations found to be malicious are removed from personnel records (whereas before all allegations had to be retained)
- Records are kept of all other allegations but any that are not substantiated, are unfounded or malicious should not be referred to in employer references (whereas before details of all allegations had to be passed on in references).

Further detail with regards to the procedures for dealing with allegations of abuse against staff are available from Ealing Independent College.

- Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency

g) ALLEGATIONS AGAINST PUPILS (including child-on-child abuse)

Introduction: Ealing Independent College takes a firm line in relation to possible child-on-child abuse. It can take on many forms, including:

- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling
- otherwise causing physical harm
- sexting
- initiating/hazing type violence and rituals

With regard to sexual violence and sexual harassment, Ealing Independent College pays due regard to Part 5 of KCSIE (September 2023). Ealing Independent College holds and promotes a clear view that sexual violence and sexual harassment are never acceptable and will not be tolerated.

Ealing Independent College's procedures in relation to child-on-child abuse follow the DfE advice to adopt a "whole school" approach, involving all staff, pupils, governors and parents, as part of Ealing Independent College's broad approach to safeguarding. Central to such an approach are (i) staff training so that staff know what to do if they have a

concern about a child and (ii) a planned curriculum and extra-curricular programme, including assemblies, which takes a preventative approach through the setting of values and standards and the promotion of the fundamental British values, notably in this context, of respect and tolerance. Through the wider curriculum, including Relationships Education (Primary), Relationships and Sex Education (Secondary) and Personal, Social and Health Education, Ealing Independent College aims to provide pupils with an understanding appropriate to their age and stage of development of issues such as:

- healthy and respectful relationships
- what respectful behaviour looks like
- consent
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment are always wrong
- addressing cultures of sexual harassment.

Sexual violence and sexual harassment can occur between two children or a group of children of any age and sex. They may be physical and/or verbal and may occur online and offline. Children who are victims will likely find the experience stressful and distressing and their educational attainment could be negatively affected. Sexual violence and sexual harassment are never acceptable and Ealing Independent College will take all matters seriously and offer victims appropriate support. 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. In particular, reports will not be allowed to be passed off, either by pupils or staff, as;

- banter
- just having a laugh
- part of growing up
- boys being boys

Research shows that it is more likely that girls will be the victims of sexual violence or harassment and more likely that boys are the perpetrators. Children with SEND are three times more likely to be abused than their peers. Further information is available in Part 1.4 of the DfE guidance, cited above. Such behaviour must be challenged, since it is normalised by being dismissed or tolerated.

Definitions:

In this context, *sexual violence* is as defined in the Sexual Offences Act 2003. *Sexual harassment* is defined as unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to:

- violate a child's dignity
- make him or her feel intimidated, degraded or humiliated
- create a hostile, offensive or sexualised environment.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. It can include:

- sexual comments, (such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names)
- sexual "jokes" or taunting
- physical behaviour, (such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature)

- online sexual harassment, (which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence). It may include:
 - o non-consensual sharing of sexual images and videos*.
 - o sexualised online bullying
 - o unwanted sexual comments and messages (including on social media)
 - o sexual exploitation (coercion and threats).
- upskirting; this is now a criminal offence, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

* UK Council for Child Internet Safety (UKCIS) provides detailed advice for schools on the sharing of nude and semi nude images (sexting) (refer to links in Appendix 2).

Harmful sexual behaviour is a term used to describe behaviour which is beyond that which is normal and developmentally expected, and can be problematic, abusive or violent. It can occur online and/or offline and should be considered in a child protection context. For further information, refer to the NSPCC guidance (see link in Appendix 2).

Handling a concern:

A pupil reporting sexual violence or sexual harassment will be offered support and every effort will be made to ensure that his or her education is not disrupted. Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Staff are provided with training to facilitate a calm and considered response to any concern.

A member of staff who receives a report of sexual violence or sexual harassment will take action in line with the standard guidance for dealing with disclosures, as identified in this policy. As with all concerns about the welfare of a child, all staff should act in the best interests of the child. The child making the report will be reassured, supported, taken seriously and kept safe. He or she should never be given the impression that reporting causes a problem, or be made to feel ashamed for making a report. In some cases, a third party, such as a friend, rather than the victim, may make the report. In such cases the same procedures will be followed, and it is important that Ealing Independent College understands why the victim has chosen not to make the report personally. Children may not find it easy to tell staff about abuse. Children can show signs or act in ways that they hope adults will notice and react to, or staff may overhear a conversation. If staff have **any** concerns about welfare, they should act on them immediately rather than wait to be told.

In overseeing the management of the concern, the DSL will consider, in line with overall safeguarding guidance, whether a referral should be made to children's social care and, where a crime may have been committed, will make a referral to the police.

The principles for handling a report of sexual violence or sexual harassment remain the same if the incident is alleged to have taken place off Ealing Independent College premises, or to have involved pupils from more than one school. In the latter case, appropriate information sharing and effective multi-agency working are especially important.

If possible, a report will be managed with two members of staff present, (preferably one of them being the DSL or deputy). However, this might not always be possible. The DSL should be informed as soon as practically possible, if he or she is not involved in the initial report. If the report involves illegal images of children, it is a key consideration that staff should not view or forward such images. If viewing such an image is

unavoidable, the UKCCIS advice (see link in Appendix 2) provides more details on what to do.

When there has been a report of sexual violence, the DSL or deputy should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially his or her protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at Ealing Independent College

The risk assessment will be recorded and kept under constant review. Full details of the matters for the DSL to consider in managing a report are given in paragraph 61 onwards of the DfE guidance cited above. In summary these are:

- the wishes of the victim in terms of how he or she wants to proceed
- the nature of the alleged incidents
- the ages and developmental stages of the children involved
- any power imbalance between the children
- whether the incident is a one-off or a sustained pattern of abuse
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- any ongoing risks to the victim
- any other related issues and wider context

Ealing Independent College's initial response to a report is incredibly important, as it can encourage or undermine the confidence of further victims in coming forward.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, Ealing Independent College should decide on a course of action. Consideration should be given to whether there are wider cultural issues within Ealing Independent College that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

The four scenarios are:

1. **Manage internally.** In some cases of sexual harassment, for example, one-off incidents, Ealing Independent College may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

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2. **Early help assessment.** Ealing Independent College may decide that the children involved do not require referral to statutory services but may benefit from an early help

assessment. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. An early help assessment can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support. More information on Early Help is set out on Page 17 of KCSIE 2023 with full details of the early help process in Chapter one of Working Together to Safeguard Children.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).

3. Referrals to children's social care. Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local children's social care. At the point of referral to children's social care, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.

If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, Ealing Independent College (especially the designated safeguarding lead or deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support

Schools and colleges should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in Ealing Independent College. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions Ealing Independent College takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 479-481 of KCSIE will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at Ealing Independent College should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. Ealing Independent College (generally led by the designated safeguarding lead or deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

4. Reporting to the Police. Any report to the police will generally be in parallel with a referral to children's social care (as above). It is important that the designated safeguarding lead (and the deputy) are clear about the local process for referrals and follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

Where a report has been made to the police, Ealing Independent College should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best

way to protect the victim and their anonymity. At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that Ealing Independent College is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that Ealing Independent College continue to engage with specialist support for the victim and alleged perpetrator(s) as required. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions Ealing Independent College take do not jeopardise the police investigation.

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance. Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions. Whatever arrangements are in place, Ealing Independent College will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution. Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc). Careful liaison with the police investigators should help to develop a balanced set of arrangements.

There may be delays in any case that is being progressed through the criminal justice system. Schools and colleges should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in Ealing Independent College. The risk assessment as per paragraph 479-481 in KCSIE will help inform any decision.

If a child is convicted or receives a caution for a sexual offence, Ealing Independent College should update its risk assessment, ensure relevant protections are in place for all the children at Ealing Independent College and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school or college as the victim, Ealing Independent College should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions Ealing Independent College thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

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Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in Ealing Independent College. It will be important that Ealing Independent College ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, Ealing Independent College should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Supporting the victim:

further guidance: Further information and useful links to additional documentation can be found at paragraph 546-551 in KCSIE 2023.

Safeguarding and supporting the alleged perpetrator:

Due consideration will be given to the support and safeguarding needs of the alleged perpetrator. Children abusing other children may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of Ealing Independent College. Ealing Independent College will consider the balance of safeguarding the victim and providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions. These will be considered on a case-by-case basis and will take account of the age and developmental stage of the perpetrator(s), the nature of the allegations and frequency of allegations.

A pupil against whom an allegation of abuse has been made may be suspended from Ealing Independent College during the investigation, as determined by the head in discussion with the DSL. Careful liaison with children’s social care and the police, as appropriate, will aim to ensure that any action taken by Ealing Independent College will not prejudice an investigation and/or any subsequent prosecution. It is also important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a high level of support to help understand and overcome the reasons for such behaviour and help protect other children by limiting the likelihood of abusing again. Ealing Independent College will work with professionals as appropriate to provide support and to help alleged perpetrators understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again. Disciplinary action and appropriate support are not mutually exclusive; they can and should occur at the same time, where necessary.

In addition to the procedures in this policy, Ealing Independent College’s policy on behaviour, discipline and sanctions will apply. A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm.

Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre 113 (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

More information on harmful sexual behaviours (HSB) can be found at paras 454-457 of KCSIE September 2023, Sexual violence and sexual harassment between children at schools and colleges. Advice should be taken, as appropriate, from children’s social care,

specialist sexual violence services and the police. The NSPCC also provides free and independent advice about HSB: NSPCC Learning - Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework

A useful case study explaining issues around the victim and alleged perpetrator(s) sharing classes can be found on page 126 of KCSIE 2023.

Working with parents:

Ealing Independent College will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence, though this might not be necessary or proportional in the case of sexual harassment. This will be considered on a case-by-case basis. The exception to this requirement is if there is a reason to believe that informing a parent or carer will put a child at additional risk. Careful consideration, based, where appropriate, on advice from relevant agencies, will be given to what information is provided to the respective parents or carers about the other child involved and when this is provided. Further details on working with parents can be found in paragraphs 546-551 in KCSIE 2023.

Safeguarding other children:

Ealing Independent College will consider carefully the safeguarding needs of other children, particularly any who may need support due to having witnessed sexual violence. Following an incident, it is likely that other children will 'take sides' and Ealing Independent College will be vigilant to do all it can to ensure that the victim, alleged perpetrator and any witnesses are not bullied or harassed, including via social media.

h) SUSPECTED HARM FROM OUTSIDE Ealing Independent College:

A member of staff who suspects that a pupil is suffering harm from outside Ealing Independent College should seek information from the child with tact and sympathy using "open" and not leading questions (see TED questions, in a), above). A sufficient record should be made of the conversation and given to the DSL for child protection.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

i) PUPILS WITH SEND

Children with SEND can face additional Safeguarding challenges and there may be additional barriers to recognising abuse and neglect in this group of children. This may include

- Assumptions that indicators of possible abuse such as behaviour, mood or injury relate to the child's disability without further exploration
- Children with SEND being disproportionately impacted by issues such as bullying without showing any outward signs
- Children with SEND being unable to communicate instances of possible abuse

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Ealing Independent College's behaviour and anti-bullying policies make specific reference to dealing appropriately with SEND. Staff should be vigilant in relation to the bulleted points above, reporting any concerns to the DSL.

CHILDREN WHO ARE LESBIAN, BI, GAY OR TRANS

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum

j) LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Ealing Independent College's governance ensures that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children (since they remain vulnerable) safe. In particular, this involves ensuring that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Staff should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children. Where there is a looked after, or previously looked after child at Ealing Independent College, a designated teacher will be appointed, who will work with local authorities to promote the educational achievement of such pupils. Ealing Independent College has appointed Laura Bellerby as designated teacher for looked after children. She will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. Ealing Independent College will provide appropriate training for such a role.

5. SUPPORTING THE PUPIL AT RISK

Ealing Independent College recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame. Ealing Independent College may be the only stable, secure and predictable element in the lives of children at risk. However, when at school their behaviour may be challenging and defiant and they may be withdrawn.

Ealing Independent College will endeavour to support the child through:

- The content of the curriculum to encourage self-esteem and self-motivation.

- The PSHE (or equivalent in your school) programme, through which pupils will, according to their age and stage of development, learn to develop a healthy, safer lifestyle by being able to:
 - Recognise and manage risks in different situations and then decide how to behave responsibly.
 - Judge what kind of physical contact is acceptable and unacceptable.
 - Recognise when pressure from others (including people they know) threatens their personal safety and well-being and develop effective ways of resisting pressure, including knowing when and where to get help.
 - Be assertive to help resist unhelpful pressure.
 - understand the law on child on child abuse is there to protect them rather than criminalise them.
 - Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people.
 - The government has published advice and guidance on [Preventing and Tackling Bullying, Mental Health and Behavior in School](#). The Mental Health and Behaviour in Schools guidance sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their pupils.

- Ealing Independent College ethos, which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- Ealing Independent College behaviour policy, which is aimed at supporting vulnerable pupils in Ealing Independent College. Ealing Independent College will ensure that the pupil knows that some behaviour is unacceptable and that they are valued and not to be blamed for any abuse which has occurred.
- The PSHE programme, assemblies and other occasions, together with the watchfulness of staff and the training they receive, in respect of issues such as mental health, body image, eating disorders, female genital mutilation (FGM), self-harm and radicalisation. (refer also to Section 14)
- Liaison with other agencies who support the pupil such as Social Services, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology Service.
- Ealing Independent College understands that it has an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. See previous point
- Close monitoring of attendance, identifying patterns and concerns relating to children missing from school.
- The careful vetting of the visiting speakers to ensure that the content of what they intend to say is appropriate in relation to Ealing Independent College's ethos and fundamental British values.
- Drawing up a child protection plan, in consultation with other agencies, if appropriate, to identify strategies to assist a child.
- Keeping records and notifying the Safeguarding in Education Team (if the student is resident in Ealing, this will be the Ealing Children's Integrated Response Service) as soon as there is a recurrence of a concern.
- The appropriate transfer of information to the next school or setting when a pupil on the child protection register leaves Ealing Independent College. If Ealing

Independent College does not know where the pupil has moved to, the LA Designated Officer will be contacted as soon as possible.

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- The appropriate transfer of information to a new school or setting when a pupil leaves Ealing Independent College whenever Ealing Independent College has recorded child protection concerns.
- When required, Ealing Independent College will contribute to inter-agency working, as noted in the statutory guidance, *Working Together to Safeguard Children 2018*, providing, for example, an offer of help and/or by contributing towards an inter-agency assessment, in accordance with the Children Act 1989, to ensure a co-ordinated offer of early help when additional needs of children are identified. Ealing Independent College will contribute to inter-agency plans to provide additional support to children subject to child protection plans and will allow access for Children's Social Care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a Section 17 or Section 47 assessment. For further information see *Working Together to Safeguard Children July 2018*; (see links in this policy in Appendix 2).

Ealing Independent College recognises the requirement, from October 2015, for teachers* to report to the police any cases or suspected cases of FGM. Nevertheless, all staff should liaise with the DSL with regard to any concerns about FGM (unless there is a reason not to do so). The police will be informed and Children's Social Care involved, as appropriate. At no time will staff examine pupils to confirm this.

* "Teachers", here refers to anyone undertaking 'teaching work', as defined in The Teachers' Disciplinary (England) Regulations 2012, as explained in the ISI commentary on the regulations. This definition includes such persons as teaching assistants, sports coaches and visiting instrumental music staff.

6. A SAFE ENVIRONMENT

Ealing Independent College recognises the need to provide a safe environment in which children can learn and develop. To facilitate this, Ealing Independent College will:

- Assess school activities and all areas of Ealing Independent College for risk and keep records.
- Ensure appropriate security at all points of access to the premises
- Not lock internal doors in areas being used by pupils;
- Fit, where possible, glass panels into the doors of classrooms, music practice rooms and other appropriate areas.
- Ensure that all visitors to Ealing Independent College are required to sign in at reception on arrival. Visitors will be required to wear their identity badges or be issued with school visitor badges upon verification of their identity.
- Ensure that staff are vigilant and will either report unidentified visitors immediately to Ealing Independent College office or challenge the person directly if safe to do so. At times when the office is closed, staff should alert the head or other senior staff on duty.
- Be aware that there are occasionally times when large numbers of unknown visitors may be on site (e.g. fixtures, open mornings, plays or concerts). On these occasions, it is not expected that all these visitors will wear badges and only visitors found in areas inappropriate to the event or whose behaviour causes concern will be reported or challenged.
- Ensure that all staff are aware of the 'Policy for management, including identification, of visitors into Ealing Independent College site', as outlined in the 'Health and Safety Policy'

- Ealing Independent College and the governors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
 - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
 - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
 - for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice. (A person satisfies the harm test if they **may harm a child or vulnerable adult** or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.

7. THE DSL

Ealing Independent College has appointed an experienced and suitably qualified member of staff who is the member of the Senior Leadership Team as DSL to be responsible for matters relating to child protection and welfare and a DDSL with similar training, to act in their absence and take the lead should an allegation be made against the DSL.

The DSL and deputy develop a complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns. The responsibilities of the DSL and DDSLs are provided in job descriptions specific to this aspect of their school role. They include;

- Being conversant with LASCB procedures and the role of other agencies.
- Following Ealing Independent College's safeguarding & child protection policies and co-ordinating child protection procedures in Ealing Independent College.
- Being the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection.
- Consulting with the Safeguarding in Education Team (if the student is resident in Ealing, this will be the Ealing Childrens' Integrated Response Service) or Social Care, or LADO, as appropriate, on issues if an allegation or suspicion occurs and liaising with the various child protection agencies where appropriate.
- The DSL should use NPCC- When to call the police to help them understand when they should consider calling the police and what to expect when they do.
- Keeping the head informed of all actions unless the head is the subject of a complaint. In this situation, the DSL should consult with the Safeguarding Governor,

relevant Education Director or proprietor.

- Co-operating with any police and LADO investigations.

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- Liaising with the head, Safeguarding Governor and relevant Education Director regarding training for all who work at Ealing Independent College on child protection issues.
- Attending appropriate higher level training every two years supplemented by informal updates as required, but at least annually.
- Undertaking training to facilitate the recognition of the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation and ensure confidence in the capability to support SEND children to stay safe online”.
- Keeping appropriate records, sharing these with agencies as and when appropriate. Data protection considerations must not be a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.
- Having a role in the oversight of Ealing Independent College’s e-safety provision, the teaching of online safety and the quality of Ealing Independent College’s filtering and monitoring
- The DSL must have details of any social worker linked to a child in Ealing Independent College.
- Supporting staff.
- Take responsibility, when a child leaves Ealing Independent College, for ensuring that the child protection file is transferred securely to the new school as soon as possible and obtaining confirmation of receipt. Such a transfer of information should be separate from the main pupil file. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. Such files should be sent to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of a new term As a recipient of a child protection file from a previous school, the DSL must ensure that key staff, including the SENCO, are made aware as required.
- The DSL should liaise with the headteacher to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and the DDSL) will need to familiarise themselves with this document.

8. HELPING A CHILD WHO WANTS TO TELL YOU ABOUT ABUSE

Staff should remember that the priority is to protect the child;

- Take the matter seriously
- React calmly and listen carefully
- Observe but do not judge
- Don’t stop the child who is freely recalling significant events
- Reassure the child that he or she has done the right thing in telling you
- Indicate the action you will take and make it clear that you will have to tell the DSL

- If the child comes back to talk at a later stage, don't comment or advise; ensure that you listen, record and reassure the child.

As a member of staff, it is essential to remember not to:

- Drag the child to the DSL – this could be interpreted as abusive in itself!
- Contact the parents yourself
- Interrogate the child or ask leading questions
- Speak to anyone about whom allegations are made, including colleagues
- Promise confidentiality
- Ask a child outright if he or she or others have suffered abuse
- Criticise the alleged perpetrator.

9. TEN KEY POINTS TO FOLLOW IF YOU SUSPECT, OR ARE TOLD OF, ABUSE:

The following guidelines, compiled by Dr Roger Morgan OBE (former Children's Rights Director), may be helpful:

Adults looking after children or young people in schools (or in residential establishments or youth organisations) should be aware of the risks of abuse (by adults or other young people), and take steps to reduce those risks. Adults (staff or volunteers) in charge of children or young people should know what to do if they suspect that someone is being abused, or if someone tells them that this is happening. The following key points give a guide on what to do and not to do:

1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough and even if you wrote on the back of something else, (it's what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards). If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
3. Do not give a guarantee that you will keep what is said confidential or secret – if you are told about abuse, you have the responsibility to tell the right people to get something done about it (see below). If asked, explain that you are going to tell the people who can provide help, but that you will only tell people who absolutely have to know.
4. Don't ask leading questions that might give your own ideas of what might have happened (e.g. "did he do X to you?") – just ask "what do you want to tell me?" or "is there anything else you want to say". Refer to the TED questions in 4(a) above. 5. Immediately tell the DSL (unless they are themselves accused or suspected of abusing, in which case this must be reported to the head) – don't tell other adults or young people what you have been told.
6. Discuss with the DSL whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
7. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc – social services and police staff are the people trained to do this

8. As soon as possible the DSL should refer the matter to the local social services department (helped by your notes). Follow their requests about what to do next. They will set up any necessary investigations, and can advise you.

9. Never think abuse is impossible in your school or group, or that an accusation against someone you know well and trust is bound to be wrong.

10. Children and young people often tell other young people, rather than staff or other adults, about abuse – make sure that senior young people know how to behave if they suspect, or are told of abuse.

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, Ealing Independent College or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

10. SAFE WORKING PRACTICE within the CODE OF CONDUCT FOR STAFF

Staff, supply staff, volunteers and helpers need to think and act carefully to avoid situations that could lead to difficulties or embarrassment or accusations. The following points are intended to provide some guidance:

- All who work with children must ensure that the children feel equally valued; favouritism, real or inferred, causes feelings of alienation and can be misconstrued.
- Staff who have concerns about the conduct of others, in respect of their engagement with children, should have the confidence that they are safe to raise their concerns and their view will be taken seriously. Staff should refer to and follow the procedures detailed in the whistleblowing policy, found in the employment manual.
- Staff should not take children out on their own and refrain from forming personal relationships exclusively with one individual.
- Staff should take care that any electronic communication with pupils is wholly appropriate, does not constitute a breach of trust and is in accordance with E-safety guidance included in Section 11 of this policy. Staff must not befriend pupils on social networking sites.
- Conversations and behaviour should be friendly but not over familiar. Young people are more comfortable with an adult in role than an adult who seeks to be 'one of the gang'.
- Responsible and appropriate use of authority provides stability and security.
- All children should be treated with dignity and respect in attitude, language use and actions.
- Respect the privacy of the children.
- Avoid questionable activity e.g. rough, sexually provocative games and comments.

- Ensure that correct safeguards are in place to cover 'one to one' situations. This may include individual coaching, instrumental music tuition, administering of first aid, nappy changing, conveying pupils by car etc. One to one situations have the potential to make a child more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them.
- Make sure that the only people allowed into an activity are the adults assigned to the group. You should not allow others to have free access unless they have a specific reason e.g. guest speaker, maintenance person.
- Physical contact should reflect the child's need not the adult's.
- Physical contact should be age appropriate and generally initiated by the child not the adult.
- Physical contact should take place only in public.
- Children have the right to decide how much physical contact they have with others, except in exceptional circumstances when they need medical attention.
 - Any act of restraint involving physical contact must be recorded in writing and the head notified immediately. The head will notify parents on the same day, or as soon as practicable thereafter. In the event the head is involved this should be passed to the Safeguarding Governor, relevant Education Director or Proprietor. A record of such incidents will be kept.
- Physical contact must be in accordance with Ealing Independent College policy on reasonable force and physical restraint, further details of this can be found in Section 14 of this policy, below.
 - Staff should monitor one another in the area of physical contact. They should be free to help each other by pointing out anything that could be misunderstood.

More detailed information is available to all staff through the document 'Guidance for safer working practice for adults who work with children and young people', (see Appendix 2) The guidance identifies many key areas where adults can protect themselves from allegations.

11. E-SAFETY POLICY

Ealing Independent College believes in the educational benefits of curriculum internet use. Good planning and management that recognises the risks will help to ensure appropriate, effective and safe pupil use. In delivering the curriculum, teachers need to plan to integrate the use of communications technology such as Google Classroom, Google Meets, Zoom, Kami and e-mail in order to enable pupils to learn how to locate, retrieve and exchange information using ICT. Computer skills are vital to access life-long learning and for future employment.

Most technologies present risks as well as benefits. Internet use for home, social and leisure activities is expanding and being used by all sectors of society. This brings young people into contact with a wide variety of influences, some of which could be unsuitable. It is important that schools, as well as parents, adopt strategies for the responsible and safe use of the Internet.

All governors (Education Directors) receive online safety information as part of their regular safeguarding and child protection training

Core Principles of Internet Safety

The internet has become as commonplace as the mobile phone or TV and its effective

use is an essential life-skill. Unmediated internet access brings with it the possibility of placing pupils in embarrassing, inappropriate and even dangerous situations. This policy aims to help to ensure responsible use and the safety of pupils. It is built on the following four core principles:

Content- being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation and extremism.

Contact- being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct- personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi nudes and/or pornography, sharing other explicit images and online bullying).

Commerce- risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Guided educational use

Significant educational benefits should result from curriculum internet use including access to information from around the world and the ability to communicate widely and to publish using a variety of media. Internet use should be planned, task-orientated and educational within a regulated and managed environment. Directed and successful internet use will also reduce the opportunities for activities of dubious worth.

Staff are guided that, in relation to the age and maturity of the pupils, when setting a task, such as homework, which involves internet research, this must not simply be an open-ended request (such as 'find out six facts about Henry VIII'). Instead, staff will research suitable and safe websites where pupils can undertake their research and will provide the pupils with a selection of website addresses. Children are also taught to evaluate the content of a site and choose the one most appropriate to their needs.

Risk assessment

21st Century life presents dangers including violence, racism and exploitation from which children and young people need to be protected. At the same time they need to learn to recognise and avoid these risks – to become "Digitally literate". Pupils need to know how to cope if they come across inappropriate material.

Responsibility

Internet safety depends on staff, schools, governors, advisers, parents and, where appropriate, the pupils themselves taking responsibility for the use of the internet and associated communication technologies. The balance between education for responsible use, regulation and technical solutions must be judged carefully.

It is acknowledged that, whilst Ealing Independent College provides pupils with a protected environment for internet usage in school, the pupils may not benefit from the same level of protection in their access to the internet beyond the confines of Ealing Independent College. Important aspects of Ealing Independent College's e-safety provision are, therefore, the development of the pupils' understanding of keeping safe online when not at school, and supporting parents in understanding how to help keep

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their children safe online. Ealing Independent College will Internet safety sessions for parents to attend in order to help parents ensure safety of pupils at home

The Principal, DSL and DDSL are responsible for ensuring, so far as is reasonably practicable, a safe environment for internet use, for the implementation of policy and for the development of the pupils' understanding of how to keep themselves safe online, both in and out of school. DSL's should read and review regular updates that are automatically generated from the filtering software outlining online behaviour of pupils and take appropriate action.

The Office Manager is responsible for the maintenance of hardware and software systems and technology to ensure, so far as is reasonably practical, safe use of the internet. An ICT consultant is responsible for overseeing the successful development, both in the wider curriculum and extra-curricular activities, of pupils' understanding of how to keep safe online and for supporting staff in implementing this objective.

All staff and volunteers are responsible for monitoring pupils' safety online and reporting any concerns arising from pupils' internet use, either at school or at home, and for supporting the development of the pupils' understanding of how to keep themselves safe online.

Regulation

The use of a limited and expensive resource, which brings with it the possibility of misuse, must be regulated. In some cases access within school is denied, for instance unmoderated chat rooms present immediate dangers and are banned. Fair rules, clarified by discussion and prominently displayed help pupils make responsible decisions for both school and home access.

Appropriate strategies

This document describes strategies to help to ensure responsible and safe use. They are based on limiting access, developing responsibility and on guiding pupils towards educational activities.

There are no straightforward or totally effective solutions and staff, parents and the pupils themselves must remain vigilant.

There is a wealth of information available to support schools, colleges and parents/carers to keep safe online. A useful list of resources can be found in KCSIE 2023 on pages 155-157.

1) The Importance of internet Use

- The purpose of internet use in school is to raise educational standards, to promote pupil achievement, to support the professional work of staff and to enhance Ealing Independent College's management information and business administration systems.
- Internet use is a part of the statutory curriculum and a necessary tool for staff and pupils.
- The internet is an essential element in 21st Century life for education, business and interaction. Ealing Independent College has a duty to provide pupils with quality internet access as part of their learning experience.

2) How the Internet benefits education

Benefits of using the internet in education include:

- access to world-wide educational resources including museums and art galleries;

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- educational and cultural exchanges between pupils world-wide;
- cultural, vocational, social and leisure use in libraries, clubs and at home;
- access to experts in many fields for pupils and staff;

- staff professional development through access to national developments, educational materials and good curriculum practice;
- communication with support services, professional associations and colleagues;
- improved access to technical support including remote management of networks.
- continuation of education when a child is off site for an extended period of time through remote learning

3) How internet use enhances learning

- Ealing Independent College internet access is designed expressly for pupil use and will include filtering appropriate to the age of pupils.
- Pupils will be taught what is acceptable and what is not acceptable and given clear objectives for Internet use.
- Internet access will be planned to enrich and extend learning activities. Access levels will be reviewed to reflect the curriculum requirements and age of pupils.
- Staff will guide pupils in on-line activities that will support the learning outcomes planned for the pupils' age and maturity.
- Pupils will be educated in the effective use of the Internet in research, including the skills of knowledge location and retrieval.

4) Pupil's Understanding of how to keep safe online

Ealing Independent College develops the pupils' understanding of how to keep safe online, as part of a broad and balanced curriculum, and their resilience in protecting themselves and their peers in the following ways:

- Annual workshop on the topic of keeping safe online delivered by the Bellevue ICT Co-ordinator
- Keeping safe online will also be covered within the PSHE programme

5) Pupils' Evaluation of internet content

Inappropriate material should not be visible to pupils using the Web. This is not easy to achieve and cannot be guaranteed. It is a sad fact that pupils may be confronted with inappropriate material, despite all attempts at filtering. Pupils will be taught what to do if they experience material that they find distasteful, uncomfortable or threatening. For example, to close the page and report the URL to the teacher or Office Manager for inclusion in the list of blocked sites. More often, pupils will be judging reasonable material but selecting that which is relevant to their needs, for instance to answer a homework question. Pupils should be taught research techniques including the use of subject catalogues and search engines. They will be encouraged to question the validity, currency and origins of information – key information handling skills. They should also use alternative sources of information for comparison purposes. Effective guided use will reduce the opportunity pupils have for exploring unsavoury areas. Using Internet derived materials in pupils' own work requires at least an understanding that straight copying is worth little without a commentary that demonstrates the selectivity used and evaluates significance. Respect for copyright and intellectual property rights, and the correct usage of published material needs to be taught. This may include covering relevant issues for schools through Relationships Education (for all primary pupils; relevant information here) and Relationships and Sex Education (for all secondary pupils; relevant information here)

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- If staff or pupils discover unsuitable sites, the URL (address) and content must be reported to the filtering provider via the Office Manager
- The use of Internet derived materials by staff and by pupils in school must comply with copyright law.

- Pupils are taught to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.
- Pupils will be taught to acknowledge the source of information and to respect copyright when using Internet material in their own work.

6) Management of e-mail

- Pupils may use only approved e-mail accounts on Ealing Independent College system.
- Pupils must immediately tell a teacher if they receive offensive comments on social media platforms, emails or documents that have been used collaboratively
- Pupils must not reveal details of themselves or others, such as address or telephone number, or arrange to meet anyone when using online communication.
- Access in school to external personal e-mail accounts is not allowed except where a teacher has specifically requested it for example to retrieve a piece of work emailed from home.

7) Management of School Media (Website and Social Media Accounts)

- The point of contact on the Website is Ealing Independent College address/school e-mail and telephone number.
 - Staff or pupils' home information will not be published.
 - Website photographs that include pupils will be selected carefully and will not enable individual pupils to be identified.
 - Pupils' full names will not be used anywhere on the Website, particularly associated with photographs.
 - Written permission from parents or carers will be obtained before photographs of pupils are published on Ealing Independent College Website.
 - The copyright of all material must be held by Ealing Independent College, or be attributed to the owner where permission to reproduce has been obtained.
 - Ealing Independent College undertakes appropriate measures for the management of personal data which is stored electronically.

8) Newsgroups and chat

- Pupils will not be allowed access to public or unregulated chat rooms in school.
- Newsgroups will not be made available unless an educational requirement for their use has been demonstrated.
- A risk assessment will be carried out before pupils are allowed to use a new technology in school.

9) Management of emerging Internet uses

- Emerging technologies will be examined for educational benefit and a risk assessment will be carried out before use in school is allowed.

10) Liaison and partnership with parents

- Parents have access to Ealing Independent College's e-safety policy on Ealing Independent College's website and can request a paper copy from reception.

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- Parents will be informed that pupils will be provided with supervised Internet access.

- Parents and pupils will be asked to sign and return a consent form.
- Periodically Ealing Independent College runs e-safety information meetings for parents, which may involve an external speaker, in order to raise their awareness of e-safety matters and help them develop their children's safe use of the Internet. Ealing Independent College is aware of the need to communicate regularly with parents, carers and guardians about the importance of children being safe online whilst outside of school.
- Copies of template agreements for children and parents are found in Appendix 3 of this policy.

12) Assessing the risks of Internet Use and Management of filtering • Governors (Education Directors) liaise with school leaders to ensure that all relevant staff have an awareness and understanding of the filtering systems in place and that they are managed effectively. In common with other media such as magazines, books and video, some material available via the Internet is unsuitable for pupils. Ealing Independent College will take all reasonable precautions to ensure that users access only appropriate material. However, due to the international scale and linked nature of Internet content, it is not possible to guarantee that unsuitable material will never appear on a school computer.

- Methods to identify, assess and minimise risks will be reviewed regularly.
- The head will ensure that the Internet policy is implemented and compliance with the policy monitored.
 - Ealing Independent College will work in partnership with parents, the DfE and our Internet Service Provider to ensure systems to protect pupils are reviewed and improved.
 - Ealing Independent College will ensure that appropriate IT filters and monitoring procedures are in place to safeguard children from potentially harmful and inappropriate material online without unreasonable 'overblocking'.
 - As part of the above Ealing Independent College should consider carefully how to manage the access to 3,4 and 5G on Ealing Independent College premises; this does not mean banning mobile devices as schools should consider how mobile phone use is managed and how filters may be supplemented with behaviour management.

13) Introduction of the policy to pupils

- Rules for Internet access can be accessed in the Student Contract
- Pupils will be informed that Internet use will be monitored.
- Instruction in responsible and safe use should precede Internet access.

14) Staff consultation and training

- Ealing Independent College will ensure that all staff have undertaken appropriate e-safety training, by using our online training provider, Safemart.
- All staff must have familiarised themselves fully with this policy before using any Internet resource in school.
- All staff, including teachers, supply staff, classroom assistants and support staff, will be provided with Ealing Independent College Internet Policy, and its importance explained.
- Staff development in the safe and responsible Internet use, and on school Internet policy will be provided as required. Induction training in safeguarding for new staff includes e-safety.

15) Technical provision, filters, safeguards and monitoring

At Ealing Independent College, these functions are provided by Smoothwall.

16) Maintenance of ICT system security

- Ealing Independent College ICT systems will be reviewed regularly with regard to security in conjunction with Paul Carter of Instaweb ICT.
- Virus protection will be installed and updated regularly by Paul Carter of Instaweb ICT.
- Memory sticks and other such portable storage devices may be brought into school when specific permission has been given. Before being used on a school device they will be scanned for virus's by the Head of ICT or a technician.
- Unapproved system utilities and executable files will not be allowed in pupils' work areas or attached to e-mail.

13. MOBILE PHONES AND CAMERAS POLICY

1. Use of Cameras and the manipulation and storage of images

In this policy terms such as 'photography', 'pictures', 'images', 'camera', 'device' and 'digital technology' include both still and video media. The term 'camera' includes mobile phones, ipads and other equipment which has the capacity to take photographs.

At Ealing Independent College we recognise that the appropriate use of photography enhances many aspects of school life and the pupils' education. Mobile phone technology has become more sophisticated over recent years and will continue to evolve. Wireless connections in particular, extend the capabilities of mobile phones further; which allow access to new content and services, such as the internet, social networking sites and instant messaging. Many mobile phones offer camera, video and audio recording as standard. Mobile phones, alongside other technologies, aim to change the way we communicate. This speed of communication often provides security and reassurance; however, as with any other form of technology, there are associated risks.

This policy is intended to ensure an environment in which children, parents and staff are safe from images being recorded and inappropriately used by providing a clear framework to ensure that

- the use of cameras and the storage of images reflect good practice
- the safeguarding needs of the pupils are met
- staff are not distracted from their work with children.

The policy also recognises that learning to use digital technology is an important part of the ICT curriculum. Teaching needs to ensure that pupils are able to learn how to use digital cameras and to edit and store photographs with an understanding of safeguarding requirements, for themselves and others, which is appropriate for their age and taking due account of the cyber-bullying aspects of Ealing Independent College's anti-bullying

policy. Reference should also be made to Ealing Independent College's E-Safety Policy (see Section 12 above) policy and planning for the internet safety topic in the PSHE scheme of work.

Photography is used at Ealing Independent College for a variety of purposes, including:

- Recording pupils' achievements, learning and progress.
- Contributing to each pupil's entry on iSAMS
- Providing evidence to support pupils' application for entrance/scholarship to their future schools.
- Recording school events and providing material for displays.
- Communication with parents, for example to help reassure new parents or carers of young children that they have settled well into school life and provide prompt information on their children's activities on residential trips.
- For publicity purposes (brochures, prospectus, media articles, website etc.) for both Ealing Independent College and Bellevue Education Group.
- To support work undertaken by members of staff or students on placements for training and gaining further qualifications.

On their child's admission to Ealing Independent College, parents are asked to sign a consent form in relation to their child being photographed at school or during school events. The form provides for parents to give permission at different levels (for example to consent to their child being photographed to record achievement and progress, but not for publicity purposes. The form also gives parents the opportunity to state whether a child in a photograph can be named. A copy of the consent form can be found at Appendix 4.

Responses to the photography consent form are collated and the summary/analysis can be consulted at the college office. It is important that staff familiarise themselves with this information. If parents withhold consent for certain aspects of photography in relation to their child, this must be respected. Images should be checked to determine whether photographs have been taken which inadvertently include pupils for whom consent has not been given. If this is the case, images should be destroyed, cropped or otherwise edited to ensure that parental consent is respected. If an image is edited for this reason, the original must be destroyed.

Periodically, professional photographers visit Ealing Independent College by arrangement to take portrait photographs and formal pictures of sports teams etc. Care should be taken that parental consent is respected and also that parents have not unintentionally withheld consent regarding such photographs. Any areas of doubt should be discussed with the Principal, who will arrange for parents to be contacted as appropriate. It is not compulsory for pupils to be included in portrait and team photography, nor is there any obligation on parents to purchase the resulting photographs.

From time to time a teacher, student or trainee teacher on placement may undertake a case study of a child, for example, as part of a training course to gain a qualification. In such situations, parental consent with regard to photography must be respected. Case studies will only be undertaken following prior written consent from the parent or carer and, except by prior arrangement between the Principal and the parent/carer, the child's name will be changed in the case study to protect his or her identity.

Occasionally a photograph may be taken which inadvertently catches a pupil in an unfortunate, embarrassing or compromising position. If this is the case, the image and any copies of it must be destroyed immediately.

Photography by parents

It is very difficult to police the use of cameras by parents, for example on the touchline

photography by parents, they should consult and DSL and/or the Principal, who will consider the situation with reference to this policy and Ealing Independent College's safeguarding procedures and take appropriate action. Concerns will be taken seriously, logged and investigated appropriately.

Any parent who works at Ealing Independent College, for example as a volunteer, must abide by this policy. The teacher responsible (for example the Trip Leader for an educational visit which uses parent volunteers) must ensure that the parents involved are aware of this policy and abide by it.

If parents wish to make a video recording of a school event (nativity, concert, drama production etc), prior permission must be obtained from the Principal, who will consider the situation with respect to this policy and the levels of consent given by parents of other children involved. Since it is difficult to ensure that parental consent is respected in these situations, and not appropriate to share the details of consent given for particular children with other parents, the Principal may refuse permission for a video recording of the event to be made. As an alternative, Ealing Independent College may make an official video recording/DVD, the editing of which, before it is made available to parents, will ensure that parental consent is respected.

Use of equipment

When possible school cameras should be used to take images of pupils. Users bringing personal devices into Ealing Independent College must ensure there is no inappropriate or illegal content on the device. Staff must ensure that this policy is observed when using other equipment which can be used in connection with photographs (photocopier, scanner, printer, ipads etc.)

When a school device is not available, teachers, when given permission by the Head, can use a personal device to take appropriate images of pupils for use on school social media accounts. It is the teachers' responsibility to ensure that the images are transferred to Ealing Independent College media drive and deleted from their personal device as soon as possible but no later than 1 week from the image being taken.

Editing and storage of photographs

All images taken by members of staff or volunteers at school or on school activities remain the property of Ealing Independent College. Ealing Independent College may require images to be deleted or edited as appropriate and may also select images taken by members of staff or volunteers for other purposes, with due attention paid to the requirements of this policy.

When editing images, staff must take due professional care and ensure that edited images do not mislead or misrepresent. Care must also be taken to ensure that images do not result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.

Close attention must be paid to the storage of images, particularly whilst kept on portable media such as flash cards and memory sticks. Staff are responsible for the security of such media and the images they contain and must take all reasonable measures to ensure that they are kept safe and do not come into the possession of unauthorised people.

Images must not be stored permanently on personal devices or storage media. Members of staff may transfer images to personal equipment for the purposes of sorting and editing but they must be transferred into the college's photograph archive and deleted from personal equipment at the earliest opportunity.

All images must be stored permanently only in Ealing Independent College's photograph archive on Ealing Independent College intranet (except where they form part of other approved school documentation, such as a record of achievement, display, brochure or official website), where they will be monitored by the DSL and Principal. Once sorted and edited, images must be transferred to the archive and deleted from other personal and school equipment and temporary storage media.

To maintain security and enable subsequent users to work effectively, images on flash cards and other portable media must be deleted once they have been transferred. Similarly, where cameras have the capacity to save images without the need for a removable card, these must be deleted after use.

Unless specific prior consent has been obtained, members of staff and volunteers must not post school images on personal pages of social networking sites or other websites. The use of images on Ealing Independent College's official Facebook page, website and other approved sites is carefully monitored by the DSL to ensure that it is in line with this policy and parental consent. The age limit for having a Facebook account is 13 and other social networks have similar restrictions. However, parents do not always enforce these restrictions. Staff must be vigilant in respect of any inappropriate use by pupils of school images or their own photographs of school events on social networks and must report any concerns to the DSL.

Final responsibility for the appropriate use of photography at school and in connection with school events rests with the Principal and the DSL. They monitor school images and may require an image to be deleted, edited or removed from a particular document, website etc in accordance with the requirements of this policy.

Ealing Independent College assesses the risk of access to archived images by inappropriate individuals to be very low. Staff and volunteers must ensure that their use and storage of images maintains a similarly acceptable level of risk.

2. Use of mobile phones by members of staff and by volunteers in school

Mobile phones provide many benefits to school life, notably in improving health and safety through better communication with staff in more remote parts of Ealing Independent College campus and on off-site visits. However, mobile phones, particularly those capable of taking pictures, also present a challenge to Ealing Independent College community to ensure that pupils are safeguarded in relation to the potential for improper use and also that their education is not impeded by the use of mobile phones at inappropriate times.

Ealing Independent College student contract provides information on the use of mobile phones by pupils. Staff must be vigilant to ensure that the use of mobile phones, including their use by volunteers, visitors and pupils is always appropriate and that the safeguarding needs of the pupils are met. Any concerns should be discussed with the Principal or DSL. Concerns will be taken seriously, logged and investigated appropriately. Where a member of staff, visitor, volunteer or pupil has a mobile phone with the facility to take pictures, its use is subject to the policy on the use of cameras and the manipulation and storage of images, above.

- On arrival at school staff should switch their phones off to ensure that they do not adversely affect their duties at school and the pupils' education.

- In cases of emergency (for example a seriously ill relative) mobile phones should be left in the office, office staff should be alerted and the phone can be left switched on so that a message can be relayed.
- Staff should only use their personal mobile phones at a time when the education of pupils is not interrupted or affected.
- Ealing Independent College nurse/lead first aider, maintenance man and head are exempt from the restrictions on the use of mobile phones whilst on duty so that they can be contacted at all times by Ealing Independent College office in case of emergency.
- School mobile phones are available from the college office. A school phone must be collected by members of staff engaged in particular school activities where it is important to maintain communication with the college office. These include:
 - o Use of local offsite facilities – swimming pool, theatre, church, sports field
 - o Educational visits and away sports fixtures
 - o Situations where, by prior arrangement with the head, a single member of staff is directly responsible for a group of pupils and a second member of staff is “on call” nearby.

Further information can be found in the parents’ handbook.

- School mobile phones should not be used for personal calls. After use they must be signed back in at Ealing Independent College office. Any problem with the phone should be reported as soon as possible.
- By arrangement with the head, a member of staff’s personal mobile phone may be designated as the means of communication for specific activities (ie those listed above). In such situations, it is expected that this policy will be observed in respect of personal use. The cost of calls made on school business will be reimbursed, provided that they can be identified on an itemised bill or otherwise.
- The use of mobile phones by staff whilst on school duties must respect national legislation and common courtesies. For example, they must not be used whilst driving and should be switched to silent at events and venues where this is expected.
- Ealing Independent College assesses the risk to pupils through the improper use of mobile phones to be very low. Staff and volunteers must ensure that their use of mobile phones maintains this level of risk.

14. USE OF REASONABLE FORCE AND PHYSICAL RESTRAINT; ACCEPTABLE PHYSICAL CONTACT

The Legal Framework

Physical Restraint should be limited to emergency situations and used only in the last resort. Under the Children Order 1995, it is only permissible as described under the heading "Physical Control". Article 4 of the Education Order 1998 clarifies powers that already exist in common law. It enables teachers and other members of staff in Ealing Independent College, authorised by the head, to use such force as is reasonable in the circumstances, to prevent a pupil from:

- Committing an offence
- Causing personal injury to, or damage to the property of, any person (including the pupil himself)
- Engaging in any behaviour prejudicial to the maintenance of good order and discipline at Ealing Independent College or among its pupils, whether during a teaching session or otherwise. (Examples of possible situations are given in Section 6) This policy draws on 'Use of reasonable force; Advice for heads, staff and governing bodies' published by the DfE in July 2013 here and page 41 of KCSIE 2022.

Definition of restraint at Ealing Independent College

Physical restraint is the positive application of force with the intention of protecting the child from harming himself or others or seriously damaging property.

General policy aims

Staff at Ealing Independent College recognise that the use of reasonable force is only one of the last in a range of strategies available to secure pupil safety/well-being and also to maintain good order and discipline. Our policy on restraint should therefore be read in conjunction with our Behaviour and Child Protection policies.

Specific aims of the restraint policy

- To protect every person in the college community from harm.
- To protect all pupils against any form of physical intervention that is unnecessary, inappropriate, excessive or harmful.
- To provide adequate information and training for staff so that they are clear as to what constitutes appropriate behaviour and to deal effectively with violent or potentially violent situations.

Why use restraint?

Physical restraint should avert danger by preventing or deflecting a child's action or perhaps by removing a physical object, which could be used to harm him/herself or others. It is only likely to be needed if a child appears to be unable to exercise self-control of emotions and behaviour. It is not possible to define every circumstance in which physical restraint would be necessary or appropriate and staff will have to exercise their own judgement in situations which arise within the above categories. Staff should always act within Ealing Independent College's policy on behaviour and discipline, particularly in dealing with disruptive behaviour.

Staff should be aware that when they are in charge of children during Ealing Independent College day, or during other supervised activities, they are acting in loco parentis and should, therefore, take reasonable action to ensure pupils' safety and well being. Failure to physically restrain a pupil who is subsequently injured or injures another, could, in certain circumstances, lead to an accusation of negligence. At the same time, staff are not expected to place themselves in situations where they are likely to suffer injury as a result of their intervention.

Ealing Independent College does not have a "no-contact" approach to pupil

reasonable force and physical restraint should, therefore, be read in connection with the section on physical contact, below. It is the intention of these policies to allow and support staff to make appropriate physical contact.

Alternative strategies

There are some situations in which the need for physical restraint is immediate and where there are no equally effective alternatives (eg is a pupil is about to run across a road). However, in many circumstances there are alternatives e.g. use of assertiveness skills such as:

- the broken record in which an instruction is repeated until the pupil complies
- use of a distracter, such as a loud whistle, to interrupt the behaviour (such as a fight) long enough for other methods of verbal control to be effective
- withdrawal of attention (audience) e.g. if an action such as damage to property is threatened
- other techniques designed to defuse the situation, such as the avoidance of confrontation, or use of humour (in these cases the incident can be dealt with later when emotions are no longer running high)
- the employment of other sanctions consistent with Ealing Independent College's policy on behaviour.

Use of physical restraint

Physical restraint should be applied as an act of care and control with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the pupil to regain self-control. It should never take a form which could be seen as a punishment. Staff are authorised to use reasonable force only in applying physical restraint, although there is no absolute definition of this, as what constitutes reasonable force depends upon the particular situation and the pupil to whom it is being applied. However, as a general rule, only the force necessary to stop or prevent the behaviour should be used, in accordance with the guidelines below.

There are some forms of physical intervention, which may involve minimal physical contact, such as blocking a pupil's path or the staff member physically interposing him or herself between the pupil and another pupil or object. However, in some circumstances, direct physical contact may be necessary. In all circumstances other methods should be used if appropriate or effective physical restraint should be a last resort.

KCSIE 2022 provides additional guidance that reasonable force may involve either *passive* physical contact, such as standing between pupils or blocking a pupil's path, or *active* physical contact such as leading a pupil by the arm out of the classroom.

When considering the use of reasonable force towards children with SEND or medical conditions, the risks should be carefully considered and reasonable adjustments made in relation to individual needs. Individual behaviour plans, personal health or medical plans and other forms of proactive behaviour support should be taken into account to reduce the need for reasonable force.

When physical restraint becomes necessary:

DO

- Tell the pupil what you are doing and why
- Use the minimum force necessary
- Involve another member of staff if possible
- Tell the pupil what s/he must do for you to remove the restraint (this may need

- frequent repetition)
- Use simple and clear language

- Hold limbs above a major joint if possible e.g. above the elbow
- Relax your restraint in response to the pupil's compliance

DON'T

- Act in temper (involve another staff member if you fear loss of control)
- Involve yourself in a prolonged verbal exchange with the pupil
- Attempt to reason with the pupil
- Involve other pupils in the restraint
- Touch or hold the pupil in sexual areas
- Twist or force limbs back against a joint
- Bend fingers or pull hair
- Hold the pupil in a way which will restrict blood flow or breathing e.g. around the neck
- Slap, punch, kick or trip up the pupil

Actions after an incident

Physical restraint often occurs in response to highly charged emotional situations and there is a clear need for debriefing after the incident, both for the staff involved and the pupil. **The Principal or Vice Principal should be informed of any incident as soon as possible** and will take responsibility for making arrangements for debriefing once the situation has stabilised. An appropriate member of the teaching staff should always be involved in debriefing the pupil involved and any victims of the incident should be offered support, and their parents informed on the same day by the head (see below). A copy of the form in Appendix 5 must be completed by the member of staff involved and any adult witnesses on the same day as the incident and passed to the person reviewing the incident. In incidents where a member of SLT or the head is involved the Safeguarding Governor or a member of Governance must be informed.

If the behaviour is part of an ongoing pattern it may be necessary to address the situation through the development of a behavioural EHC plan, which may include an anger management programme, or other strategies agreed by the SENCO. It is also helpful to consider the circumstances precipitating the incident to explore ways in which future incidents can be avoided. All incidents should be recorded immediately. All sections of this report should be completed so that in the event of any future complaint a full record is available. The head (or, in his/her absence, a member of the leadership team) will contact parents as soon as possible after an incident, normally on the same day, to inform them of the actions that were taken and why, and to provide them with an opportunity to discuss it.

Risk Assessments

If Ealing Independent College becomes aware that a pupil is likely to behave in a disruptive way that may require the use of reasonable force, the Principal will plan how to respond if the situation arises. Such planning will address:

- Management of the pupil (e.g. reactive strategies to de-escalate a conflict, holds to be used if necessary)
- Involvement of parents to ensure that they are clear about the specific action Ealing Independent College might need to take
- Briefing of staff to ensure they know exactly what action they should be taking (this may identify a need for training or guidance)
- Identification of additional support that can be summoned if appropriate.

Complaints

A clear restraint policy, adhered to by all staff and shared with parents, should help to avoid complaints from parents. It is unlikely to prevent all complaints, however, and a

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dispute about the use of force by a member of staff might lead to an investigation, either under disciplinary procedures or by the Police and social services department under child protection procedures. It is our intention to inform all staff, pupils, parents and governors about these procedures and the context in which they apply.

When might it be appropriate to use reasonable force?

Examples of situations that may require restraint are when:

- a pupil attacks a member of staff, or another pupil
- pupils fighting
- a pupil is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials, substances or objects
- a pupil is running in a corridor or on a stairway in a way in which he/she might have or cause an accident likely to injure her/himself or others
- a pupil absconding from a class or trying to leave school (NB this will only apply if a pupil could be at risk if not kept in the classroom or at school)
- a pupil persistently refuses to obey an order to leave an area
- a pupil behaves in such a way that seriously disrupts a lesson.

Acceptable Physical Contact

It is inappropriate to rule out all forms of physical contact between adults and pupils in school. In many circumstances, particularly with younger pupils, physical contact is important in providing comfort, reassurance and trust. It is important, therefore, that acceptable parameters for physical contact are understood and followed. Staff should be careful that their actions do not lead to misinterpretation, making themselves vulnerable to accusations of inappropriate contact. In this context, this section should be read in conjunction with Section 10 (Safe Working Practice) of this policy and also the Bellevue employment manual.

General Principles:

- Physical contact should always be a response to the needs of the child, not the adult and should last only as long as is necessary
- It should take place only with the child's clear consent
- Adults should be aware of any religious or cultural practices or beliefs which may influence whether physical contact is acceptable
- Aspects of the curriculum, such as coaching in sport, music, drama and dance, may be more effectively taught through strategies which involve physical contact. However, these should be undertaken in a public arena, such as a class situation, and not in one-to-one tuition.

Specific Considerations

- The administration of first aid or medication may necessitate contact proximate to intimate areas of the body. In such circumstances, administration should be undertaken in a manner which respects the dignity of the patient by someone who is suitably qualified. Except with the youngest children, and thereafter, in accordance with age-appropriate expectations, administration should preferably be undertaken by someone of the same gender and a second adult should be present.

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15. RADICALISATION AND EXTREMISM: THE 'PREVENT' STRATEGY

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism is the vocal or active opposition to fundamental values and includes calling for the death of members of the armed forces.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Ealing Independent College is committed to supporting the 'Prevent' strategy in relation to radicalisation and extremism. It works to prevent children being drawn into supporting extremist ideas and terrorist ideology and to help them develop resilience to radicalisation. The Bellevue Safeguarding Governor is the governance committee's 'Prevent lead person' and the DSL is the nominated member of staff to be the 'Prevent lead person' in school.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or deputy making a referral to the Channel programme.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Channel guidance can be found [here](#)

Further information on the Prevent duty can be found via the link in Appendix 2.

Ealing Independent College undertakes the following measures in relation to the 'Prevent Strategy':

- 'Prevent' is considered carefully as part of Ealing Independent College's safeguarding procedures
- All staff and volunteers undertake training in respect of 'Prevent'
- The DSL undertakes a higher level of 'Prevent' training in order to support staff, engage effectively with external agencies and follow reporting and information sharing protocols appropriately
- 'Prevent' is considered carefully in the appointment of new staff, volunteers and contractors and in the admitting of visitors and visiting speakers to Ealing Independent College
- 'Prevent' is a topic for governance, staff and SLT meetings
- There is a clear referral route through the DSL to 'Channel'

- Ealing Independent College strongly promotes fundamental British values in curricular and extra-curricular activities and the promotion of Ealing Independent College's ethos and aims.
- Ealing Independent College will work as required with other agencies, including the LADO, LSCB, Children's Services and 'Channel' with regard to the 'Prevent' agenda
- Computer systems have appropriate levels of filtering to ensure, insofar as is possible, that terrorist and extremist material is suitably controlled
- Ealing Independent College provides internet safety training for pupils, parents and staff and pupils are strongly supported to enable them to use the internet safely
 - PSHE lessons, assemblies and other areas of the curriculum and extra-curricular programme include topics to help develop pupils' resilience to radicalisation.

16. VETTING VISITING SPEAKERS

Ealing Independent College is aware of the potential risk to children through exposure to views of visiting speakers whose presentations may include material of an extremist nature or which contradicts Ealing Independent College's commitment to provide pupils with a balance of opposing political views. Accordingly, Ealing Independent College undertakes a range of measures to vet the content of presentations by visiting speakers. The level of checking will be determined by an assessment of the likely level of risk and may include the following measures;

- The visiting speaker will be asked to provide assurance that the content of the presentation does not include material of a radicalising or extremist nature and is not in any other way inappropriate for the pupils involved.
- Presentations, such a Powerpoint, will be required in advance and will be checked by the member of staff responsible and discussed with the speaker
- Visiting speakers will always be accompanied. A member of staff will attend presentations to pupils and will be prepared to intervene, should the content stray from agreed expectations
- An appropriate level of checks, including an identity check, will be undertaken on visiting speakers, particularly any not previously known to Ealing Independent College. Most speakers will be well known to Ealing Independent College (parents, local professionals, religious leaders) and Ealing Independent College will be familiar with their standing and reputation. Where a speaker represents an organisation, for example, the fire service or a charity, identity checks will include verification of the speaker's connection with the organisation.
- Ealing Independent College's vetting procedures may include an internet search to check for links with inappropriate organisations or the expression of extremist views which would indicate that it would be inappropriate to address pupils at Ealing Independent College.

The above procedures apply at an appropriate level, to all situations where visitors present to the pupils, not simply formal talks, but also the more informal visits to class, covering topics from dental care to Diwali. The procedures are also followed where speakers visit at the invitation of pupils. Any such pupil invitation must be approved by a member of the SLT.

17. REVIEWING THIS POLICY

When reviewing this policy Ealing Independent College will draw on the expertise of staff in shaping the safeguarding arrangements and policies, to ensure that Ealing Independent College considers at all times what is in the best interests of the child.

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Ealing Independent College

18. Appendices to the Child Protection (Safeguarding) Policy

Appendix 1 Definitions

This section is designed to provide information that facilitates understanding of key terminology and indicators:

WHAT IS CHILD ABUSE? Defined in the Government guidance KCSIE (September 2022)

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

Abuse:

a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

There are four types of child abuse.

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Physical abuse:

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

Emotional abuse:

the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate

expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or

the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse:

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

Neglect:

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

Bullying is not defined as a form of abuse in Working Together but there is clear evidence that it is abusive and will include at least one, if not two, three or all four, of the defined categories of abuse.

The following provides useful guidance on specific further categories of abuse;

Child Sexual Exploitation

In February 2017 the DfE published updated guidance on Child Sexual Exploitation, in the form of an update to Working Together 2018. The government provided updated information in KCSIE 2023. The updated guidance includes the following definition: • CSE (Child Sexual Exploitation) is a form of child sexual abuse. Sexual abuse may

involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

- CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- 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 have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic

relationship.

- Further information about CSE including definitions and indicators is included in Annex B of KCSIE 2023
- Some additional specific indicators that may be present in CSE are children who:
 - -have older boyfriends or girlfriends; and

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- -suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.
- Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

Child Criminal Exploitation

- Some specific forms of CCE (Child Criminal Exploitation) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 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 also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Staff have been made aware of the updated guidance and recognise that no school, community or social group is immune to the risk of child sexual exploitation, including online, and it can affect both boys and girls. Children can be perpetrators as well as victims.

Appendix 2 provides links to relevant documentation relating to child sexual exploitation.

Child-on-Child Abuse (Child on child)

All staff should be aware that children can abuse other children (often referred to as child on child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

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All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy). Sexual

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violence and harassment can occur between two children of any age and sex. Staff working with children are advised to maintain an attitude of "it could happen here".

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to Ealing Independent College's or college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

The following document contains further detailed information:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Serious Violence and County Lines

Ealing Independent College ensures that all staff are aware of indicators which may signal that children are at risk from, or are involved in, 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts of new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to

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suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

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
- can affect any vulnerable adult over the age of 18
 - can still be exploitation even if the activity appears consensual
 - can involve force and/or enticement 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.

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.

For further information about sexual harassment see Annex B.

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some more specific indicators for county lines include children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence
- are involved in receiving requests for drugs, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as "plugging", where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a "trap house" or "cuckooing" or hotel room where there is drug activity
- owe a "debt bond" to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information can be found here:

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

FGM (Female Genital Mutilation)

FGM is a crime committed usually within the scope of honour-based abuse. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and

damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and, therefore, girls within that age bracket are at a higher risk.

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FGM is illegal in the UK. On the 31 October 2015, it became mandatory for teachers to personally report known cases of FGM to the police. Please refer to section 5, above for information on this mandatory duty and to Appendix 2 for relevant contact information.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated the staff will inform the DSL who will report it as with any other child protection concern.

Honour-Based Abuse (HBV)

Honour-based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community, including FGM, forced marriage, and practices such as breast ironing. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV

Honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family

Women and girls are the most common victims of honour-based violence. However, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the DSL or deputy. As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. However, if it is clear that a crime has been committed or the pupil is at immediate risk, the police will be contacted in the first place. It is important, if honour-based violence is known or suspected, that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Children Missing From Education

Ealing Independent College views absence as an issue related to both safeguarding and educational outcomes. Measures have been taken to adopt the additional admissions and attendance requirements which came into force on 5th September 2016 with a view

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to minimising the occurrence of children missing from education. Relevant staff have received training from Ealing Independent College's safeguarding governor in the implications and implementation of these measures. Ealing Independent College liaises with and reports to the Local Authority, as required, on these matters and may take steps that could result in legal action for attendance, or a referral to children's social care, or both. In accordance with the requirements of KCSIE 2023, Ealing Independent College holds, so far as is reasonably possible, more than one emergency contact number for each pupil.

Patterns of children missing education, particularly repeatedly, can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of Ealing Independent College's unauthorised absence and children missing from education procedures. It is essential that they are assiduous in their prompt completion of attendance registers, liaise closely with Ealing Independent College office to resolve any unexplained absences, and report any concerns about absence to the DSL. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance is considered with other known factors or concerns. On a day-to-day basis administrative staff monitor registers for patterns of absence and SLT undertakes a regular review of attendance records to analyse for patterns and trends.

The DSLs and staff consider the following, as appropriate:

Children missing lessons:

- Are there patterns in the lessons that are being missed?
- Is this more than avoidance of a subject or a teacher?
- Does the child remain on the college site?
- Is the child being sexually exploited during this time?
- Is the child late because of a caring responsibility?
- Has he or she been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons, and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

Children missing single days:

- Is there a pattern in the day missed?
- Is it before or after the weekend suggesting the child is away from the area?
- Are there specific lessons or members of staff on these days?
- Is the parent informing Ealing Independent College of the absence on the day?
- Are missing days reported back to parents to confirm their awareness?
- Is the child being sexually exploited during this day?
- Do the parents appear to be aware?
- Are the pupil's peers making comments or suggestions as to the whereabouts of the pupil?

Children with continuous days of absence:

- Has the college been able to make contact with the parent?
- Is medical evidence being provided?
- Are siblings attending school (either our or local schools)?
- Did we have any concerns about radicalisation, FGM, forced marriage, honour based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?

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Elective Home Education (EHE)

Home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. Schools must inform their LA of all deletions from their admission register when a child is taken off roll, except if the name is deleted after they have completed the final year at Ealing Independent College. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible.

Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Forced Marriage

In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. are under 18. It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice. Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. Ealing Independent College's policies and practices reflect the fact that, while all members of staff have important responsibilities with regard to pupils who may be at risk of forced marriage, they should not undertake roles in this regard that are most appropriately discharged by other children's services professionals, such as police officers or social workers.

Characteristics that may indicate forced marriage:

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a dip in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and pupils being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that, where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

Cybercrime

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

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Cyber-dependent crimes include unauthorised access to computers ("hacking"), denial of service (DoS) attacks ("booting"), and making, supplying or obtaining malicious software ("malware") with the intent to commit further offences.

If there are concerns about a child the DSL should consider referring into the Cyber Choices programme. This is a nationwide police programme aiming to intervene where a young person is at risk of being drawn into cyber-dependent offences. More information can be found at:

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims. A copy of which can be found [here](#)

Definition of harm & significant harm - adoption & children act 2002 (section 10)

"Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another)."

'*Development*' means physical, intellectual, emotional, social or behavioural development.

'*Health*' means physical or mental health.

'*Ill treatment*' includes sexual abuse and forms of ill treatment which are not physical. NB: The Adoption & Children Act 2002 s120 amended the definition of harm to include those instances where a child may witness domestic violence.

Recognition of significant harm.

Significant harm includes an allegation of a sexual nature or parents whose behaviour may present risk because of:

- Domestic violence, drug and alcohol abuse and mental health problems
- Any physical injury caused by assault or neglect which requires medical attention
- Repeated incidents of physical harm
- Any contact with a person assessed as presenting a risk to children
- Children who live in low emotional warmth, high criticism environments
- Children who suffer from persistent neglect

- Children who may be involved in prostitution
- Other circumstances where professional judgement and/or evidence suggest a child's health, development or welfare may be significantly harmed. • 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Harm Test

What is the harm test? There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test. To satisfy the harm test there needs to be credible evidence of a risk of harm to children or vulnerable adults such as statements made by an individual regarding conduct/behaviour, etc. For a case to be considered as a risk of harm, relevant conduct would not have occurred but there must be tangible evidence rather than a "feeling" that a person represents a risk to children and / or vulnerable adults. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

Indicators of abuse

Physical:

- Unexplained injuries, burns, bruises
- Finger marks
- Fear of undressing or medical help
- Improbable explanations for injuries
- Fear of returning home or parents being contacted
- Unexplained absence from school.

Neglect:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness and non attendance
- Poor social relationships
- Constant tiredness
- Independent and street wise
- No parental support for education
- Compulsive stealing or scrounging.
- A child going missing from an education setting is a potential indicator of abuse and neglect.

Emotional Abuse:

- Fear of new situations
- Inappropriate emotional responses
- Self harm
- Reluctance to accept praise
- Low self esteem
- Lack of home support
- Depressed and withdrawn
- Social isolation – not joining in, and few friends.

Sexual Abuse:

- Bruises
- Scratches
- Bite marks on the body
- Persistent infections in the anal or genital area
- Any sexual awareness inappropriate to child's age – shown in drawings, play, vocabulary
- Frequent masturbation
- Changes in behaviour

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- Refusal to stay with certain people
- Self-harm
- Depression
- Low self-esteem
- Pregnancy.

Recognition of abuse

Be open to possibilities. Be aware – if you don't believe it is possible you will never see it. Don't jump to conclusions and look for credible non-abusive explanations, but recognise you may need to seek advice to evaluate the facts. Don't let your preconceptions of the family skew your judgement.

The symptoms of stress and distress

An abused child will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may, of course, have nothing to do with abuse, but are worth consideration in trying to understand the child's behaviour:

- A drop in school performance
- Aggressive or hostile behaviour
- Difficulties in relationships with peers
- Excessively affectionate or sexual behaviour towards adults or other children
- Regression to more immature forms of behaviour
- Self-harming or suicidal behaviour
- No reasonable or consistent explanation for a pupil's injuries, or a pattern of injuries
- Disturbed sleep

In addition to the information provided in Section 14 on Radicalisation and Extremism and in this section on Abuse, staff can refer to Annex B of KCSIE 2023 for information on further specific areas of concern about vulnerability, including,

- Children and the court system
- Children with family members in prison
- Child criminal exploitation
- Domestic abuse
- Homelessness

Staff should ensure that they are familiar with the information provided within Part 1 of KCSIE 2023 and if they have any concerns report them to the DSL.

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Appendix 2 – Useful links and contact details

School Contacts:

Designated Safeguarding Lead: Laura Bellerby
laura.bellerby@ealingindependentcollege.com 020 8579 6668
Deputy Designated Safeguarding Lead: James Garside
james.garside@ealingindependentcollege.com 020 8579 6668
Bellevue Safeguarding Governor: David Williams

Ealing Childrens' Social Care Integrated Response Service (for children in need and children at risk of harm)
Tel: 02088258000
ecirs@ealing.gov.uk

Ealing LADO (for allegations against staff or volunteers)
Maggie Scarlett
asv@ealing.gov.uk
020 8825 8930

Independent Schools Inspectorate

Email: info@isi.net
Telephone: 020 7600 0100
Fax: 020 7776 8849
Address: CAP House, 9-12 Long Lane, London, EC1A 9HA

Ofsted

Email: enquiries@ofsted.gov.uk
Telephone: 0300 123 4234
Address: Piccadilly Gate, Store Street, Manchester, M1 2WD

Disclosure and Barring Service

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>
Email: dbsdispatch@dbs.gsi.gov.uk
Address: DBS, PO Box 181, Darlington, DL1 9FA
Telephone: 01325 953795

Keeping Children Safe in Education (September 2023) (KCSIE)

https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf

Working together to safeguard children July 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

Version of this guidance suitable for young people

<https://www.childrenscommissioner.gov.uk/publication/working-together-to-safeguard-children/>

Version of this guidance suitable for younger children

<https://www.childrenscommissioner.gov.uk/publication/guide-to-keeping-children-safe/>

What to do if you're worried a child is being abused (March 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Contact details for advice and support about extremism

The website for Ealing Prevent can be accessed at:

https://www.ealing.gov.uk/info/201149/crime_prevention/2340/ealing_prevent/4 You can download the Prevent referral form **on the website** and email it to them on prevent@ealing.gov.uk, or use the email address to seek advice

You can also contact the police using 101 (the non-emergency police number)

DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors : 020 7340 7264 and counter-extremism@education.gsi.gov.uk).

Revised Prevent duty guidance for England and Wales:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Contact details for mandatory reporting of FGM to the

police: Guidance on reporting in Ealing can be found here: [https://www.egfl.org.uk/services-children/safeguarding-and-child-protection/types-abuse/female-genital-mutilation-fgm#:~:text=As%20this%20is%20a%20disclosed,ECIRS%20\(social%20care%20in%20Ealing\)](https://www.egfl.org.uk/services-children/safeguarding-and-child-protection/types-abuse/female-genital-mutilation-fgm#:~:text=As%20this%20is%20a%20disclosed,ECIRS%20(social%20care%20in%20Ealing))

Use 101 to report, and the DSL should then contact Ealing children's integrated response service (ECIRS) referrals: 020 8825 8000

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DfE guidance on mental health

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWP_draft_20_03_15.pdf

DfE Guidance on Information Sharing

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Further information on contextual safeguarding

<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

NSPCC Inform website

<http://www.nspcc.org.uk/Inform>

Telephone: 0808 800 5000

Email: help@nspcc.org.uk

NSPCC Whistleblowing helpline

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

Guidance for safer working practice for adults who work with children and young people

<http://webarchive.nationalarchives.gov.uk/20100202180143/http://www.dcsf.gov.uk/ev erychildmatters/resources-and-practice/IG00311/>

Office of the Children's Commissioner for England (OCC)

<https://www.childrenscommissioner.gov.uk/>

Email: advice.team@childrenscommissioner.gsi.gov.uk

or info.request@childrenscommissioner.gsi.gov.uk

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Child Sexual Exploitation

Child sexual exploitation: definition and guide for practitioners;
www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Child sexual exploitation: annexes;

Child on Child Abuse

DfE Guidance:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Advice from the UK Council for child internet safety:

Sexting: How to respond to an incident:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf

Sexting in schools and colleges:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

NSPCC Guidance on Harmful Sexual Behaviour:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/>

Home Office guidance on preventing youth violence and gang involvement

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

Home Office guidance on Criminal Exploitation of children and vulnerable adults: County Lines

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

Guidance to support schools with data protection activity, including compliance with the GDPR.

Data Protection: toolkit for schools

Online safety

DfE advice for schools

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

Resources that could support schools and colleges include:

- [Be Internet Legends](#) developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils
- [Disrespectnobody](#) is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- [Education for a connected world](#) framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- [PSHE association](#) provides guidance to schools on developing their PSHE curriculum
- [Teaching online safety in school](#) is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
- [Thinkuknow](#) is the National Crime Agency/CEOPs education programme with age specific resources
- [UK Safer Internet Centre](#) developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

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Appendix 3 - Sample Letters to Parents and Children Regarding Internet Use

Sample Letter to Parents

Dear Parents

Responsible Internet Use

As part of your child's curriculum and the development of computing skills, **Ealing Independent College** provides supervised access to the Internet. We believe that the use of the World Wide Web and communication software such as Google Classroom is worthwhile and is an essential skill for children as they grow up in the modern world. Please would you read the attached e-safety policy, which forms part of our safeguarding policy and talk about it with your child. Then sign and return the consent form so that your child may use the Internet at school. Although there have been concerns about pupils having access to undesirable materials, we are taking positive steps to deal with this risk in school. Our school internet provider utilises a filtering system that restricts access to inappropriate materials. Whilst every endeavour is made to ensure that suitable restrictions are placed on the ability of children to access inappropriate materials, Ealing Independent College cannot be held responsible for the nature or content of materials accessed through the Internet. Ealing Independent College will not be liable for any damages arising from your child's use of the Internet facilities.

Our Rules also concern the types of communications that pupils make using computers and other technology. We would like your support in helping to ensure that the children at **Ealing Independent College** are using technology in a responsible and polite manner and never in a way that could upset another person or spoil their work.

Should you wish to discuss any aspect of Internet use please telephone me to arrange an appointment.

Yours sincerely

Parent's Consent for Internet Access

I have read and understood Ealing Independent College rules for responsible Internet use and give permission for my son/daughter to access the Internet. I understand that Ealing Independent College will take all reasonable precautions to ensure pupils cannot access inappropriate materials. I understand that Ealing Independent College cannot be held responsible for the nature or content of materials accessed through the Internet. I agree that Ealing Independent College is not liable for any damages arising from use of the Internet facilities.

Signed:

Date:

Please print name:

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Sample Consent Form

Ealing Independent College

Responsible Computer Use

Please complete, sign and return to Ealing Independent College

Pupil: Class:

Pupil's Agreement

I have read and understand Ealing Independent College e-safety policy. I will use the computer system and Internet in a responsible way and obey these rules at all times.

Signed:

Date:

Acceptable Use Agreement for Older Pupils

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone.

These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning.

Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Agreement is intended to ensure:

- that you should be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that you and Ealing Independent College systems are protected from accidental or deliberate misuse

For your own personal safety:

- You understand that Ealing Independent College will monitor your use of the systems, devices and digital communications. You should not use any systems which are intended to prevent this.
- You should keep your username and password safe and secure – you should not share it, nor try to use any other person’s username and password. You understand that you should not write down or store a password where it is possible that someone may steal it.
- You should be aware of “stranger danger”, when you are communicating online.

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- You should not disclose or share personal information about yourself or others when online (this could include names, addresses, email addresses, phone numbers, age, gender, educational details, etc.)
- You should never arrange to meet people that you have communicated with on-line
- You should immediately report to an adult any unpleasant or inappropriate material or messages or anything that makes you feel uncomfortable when I see it online.
- You should not use Ealing Independent College systems or devices for online gaming, internet shopping, file sharing, or video broadcasting (e.g. YouTube), unless you have permission from a member of staff to do so.
- You should not install, or access via a website, any social media applications (including, but not limited to, WhatsApp, Facebook, Snapchat, Instagram, etc.)

You should act as you expect others to act toward you:

- You should respect others’ work and property and should not access, copy, remove or otherwise alter any other user’s files, without the owner’s knowledge and permission.
- You should be polite and responsible when you communicate with others. You should not use strong, aggressive or inappropriate language and should appreciate that others may have different opinions.
- You must not take or distribute images or video of anyone without their permission, including teachers.

- You understand that you are responsible for your online actions, both in and out of school.

You recognise that Ealing Independent College has a responsibility to maintain the security and integrity of the technology it offers you, and to ensure the smooth running of Ealing Independent College:

- You should immediately report any damage or faults involving equipment or software, however this may have happened.
- You should not open any hyperlinks in emails or any attachments to emails, unless you know and trust the person / organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- You should not install or attempt to install or store programmes of any type on any school device, nor try to alter computer settings. Any programs that you need will be “pushed out” to your device automatically.

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When using the internet for research or recreation, you recognise that:

- You should ensure that you have permission to use the original work of others in my own work
- Where work is protected by copyright, you should not try to download copies (including music and videos)
- When you are using the internet to find information, you should take care to check that the information that you access is accurate. You appreciate that the work of others may not be truthful: and may even be a deliberate attempt to mislead.

Teachers will help you by:

- Supervising your use of the internet, and will guide you to pre-selected sites suitable for your age and maturity
- Teaching you how to stay safe online, and how to reduce risk to yourself and others
- Monitor the use of the internet and make sure that proper filters and systems are in place to keep you safe

Data Protection:

- In order to comply with our data protection policy, you should only use your school email account.
-

Please complete the sections on the next page to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. Pupil Acceptable Use Agreement Form

This form relates to the Pupil Acceptable Use Agreement, to which it is attached.

Please complete the sections below to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement.

On (this date)....., I went through this agreement with

I understand the above agreement and agree to follow these guidelines when: ● I use Ealing Independent College systems and devices (both in and out of school) ● I use my own devices (e.g. Chromebooks) when allowed in Ealing Independent College

- I use my own equipment out of Ealing Independent College in a way that identifies me as being a member of this school (e.g. communicating with other members of Ealing Independent College, using school email, etc.)

Full Name of Pupil:

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.....

Class:

Signed:

.....

Date:

.....

Parent / Carer Countersignature:

.....

Date

.....

Acceptable Use Agreement for Younger Pupils

- I will keep my passwords to myself (and ensure that they are strong by using a combination of letters and numbers.)
- I will not search the internet for images or information that will upset

anybody.

- When emailing, posting on Google Classroom or commenting on work, I will use appropriate and constructive language. I will not type anything that I would not be prepared to say to that person.
- I will not provide any personal information when online.
- If I get an email or comment from an unknown person or I find anything online that makes me feel uncomfortable I will let a teacher know. ● I will only touch someone else's computer if they give me permission to help them.
- I will remember to sign in and out of my account when I have finished using it.
- If I see another pupil not following this policy I will let a teacher know.

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Name of Pupil:

.....

Class:

Signed:

.....

Date:

.....

Parent / Carer Countersignature:

.....

Date

.....

Appendix 4 – Sample Photographic Consent Forms

Add the consent form(s) here

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Appendix 5

RECORD OF RESTRAINT

Date of incident: Time of incident:

Pupil Name: D.o.B:

Member(s) of staff involved:

Adult witnesses to restraint:

Pupil witnesses to restraint:

Outline of event leading to restraint:

Outline of incident of restraint (including restraint method used):

Outcome of incident:

Description of any injury sustained and any subsequent treatment:

Date /time parent/carer informed of incident:

By whom informed:

Outline of parent/carer response:

Signatures of staff completing report:

.....
.....
.....

Brief description of any subsequent inquiry/complaint or action: