



S11 - SAFEGUARDING POLICY AND PROCEDURE

Reviewed: Education and Policy Committee

Approved: Full Governing Body

Approved Date: September 2025

Next Review Date: September 2026

KEY SCHOOL PERSONNEL

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EXTERNAL SAFEGUARDING CONTACT DETAILS

Local Safeguarding Children Partnership (Bi-Borough of Kensington and Chelsea / Westminster):

www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/useful-safeguarding-contacts-professionals

To report a concern about a child or young person	Westminster Access Team - Tel: 020 7641 4000 - Tel Out of hours – 020 7641 6000 - Email: AccessToChildrensServices@westminster.gov.uk - Online: Multi Agency Referral Form (MARF): Children's social care Westminster City Council
Multi Agency Safeguarding Hub (MASH)	Karen Duncan - Tri-borough MASH Business Support Officer - Telephone: 020 7641 3991 - Email: kduncan1@westminster.gov.uk Dhruva Vashee - Tri-borough MASH Business Support Officer - Telephone: 07866 077169 - Email: dvashee@westminster.gov.uk Menna Emmanuel - Specialist Community Public Health Nurse: - Telephone: 020 7641 5498 - Email: menna.emmanuel@nhs.net Debra Cox - Specialist Health Practitioner in MASH: - Telephone: 020 7641 3485 - Email: Debra.Cox@nhs.net
Early Help and Family Support	Family Information Hub Early Help and family support (westminster.gov.uk) Family Information Hub How to access 'Early Help' services (westminster.gov.uk)
For case consultations, advice, guidance from the Safeguarding Teams in Children's Social Care	For case consultations or follow-up enquiries please contact the Duty Child Protection Adviser on 020 7641 7668. Sarah Mangold - Interim Service Manager for Safeguarding, Bi-Borough - Mobile: 07984 016 841 - Email: sarah.mangold@rbkc.gov.uk
Head of Safeguarding, Review and Quality Assurance	Angela Flahive, Head of Safeguarding, Review and Quality Assurance - Tel: 020 7361 3467 - Mobile: 07971 320 888 - Email: angela.flahive@rbkc.gov.uk
Local Authority Designated Officer (LADO / Management	Please contact duty LADO for consultations and referrals - Telephone: 020 7361 2120 - Email: LADO@westminster.gov.uk

of Allegations)	Aqualma Daniel • Safer Organisations Manager & Local Authority Designated Officer • Tel: 07870 481 712 • Email aqualma.daniel@rbkc.gov.uk Sally Smith LADO Manager • Royal Borough of Kensington and Chelsea / City of Westminster • Tel: 07967 764 794 • Email: sally.smith@rbkc.gov.uk
Safeguarding Lead for Schools and Education	Elaine Campbell • Bi-Borough Safeguarding Lead for Schools and Education • Tel: 020 7361 3000 / Mobile: 07712 236 508 • Email: elaine.campbell@rbkc.gov.uk
Child Exploitation Lead (Children's Services)	Emily Harcombe • Child Protection Adviser • Email: eharcombe@westminster.gov.uk
Prevent / Channel (Radicalism and Extremism)	Kiran Malik • Prevent Programme Manager, Westminster enquiries only • Telephone: 020 7641 5071 • Email: kmalik@westminster.gov.uk or prevent@westminster.gov.uk
Education and Attendance	Wendy Anthony • Bi-Borough Head of Admissions and Access to Education • Telephone: 020 7745 6440 • Email: wendy.anthony@rbkc.gov.uk
Local Safeguarding Children Partnership (LSCP)	LSCP Business Manager: Emma Biskupski • Telephone: 07739 315 388 • Email: emma.biskupski@rbkc.gov.uk • https://www.rbkc.gov.uk/lscp

NSPCC:

Helpline: 0808 800 500 (11am to 3pm, Monday to Friday)

Email: help@nspcc.org.uk (24 hour)

NSPCC/Home Office Child Abuse Whistleblowing Helpline:

The NSPCC's *what you can do to report abuse* dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the school. See: Whistleblowing Advice Line | NSPCC. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

NSPCC/Home Office Report Abuse in Schools Helpline:

The NSPCC's dedicated helpline is available to support potential victims of sexual harassment and abuse in education settings. The NSPCC Report Abuse in Education

helpline can be reached on 0800 136 663, on Monday to Friday 8am - 10pm, or 9am – 6pm at weekends. It can also be contacted by email at help@nspcc.org.uk. The helpline is available to offer support to both children and adults who are victims of sexual abuse in schools and to provide them with appropriate support and advice. The helpline may also support victims with contacting the police and reporting crimes, if desired. The helpline will also provide support to parents and professionals too.

Contact details for *mandatory reporting Female Genitalia Mutilation (FGM)*

- Police contact: 101 (non-emergency) 999 (emergency only)
- Advice and guidance available from: 0800 028 3550 with information provided via fgmhelp@nspcc.org.uk
- Forced Marriage Unit: 020 7008 0151; email: fmf@fco.gov.uk

DBS Disclosure Service:

Address: DSB Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF
T: 03000 200 190
E: customerservices@dbb.gov.uk

DfE helpline for non-emergency advice on extremism for staff and governors:

T: 020 7340 7264
E: counter-extremism@education.gsi.gov.uk

Teaching Regulation Agency (Formerly NCTL):

<https://www.gov.uk/government/organisations/teaching-regulation-agency>
T: Contact for reporting possible teacher misconduct: 0207 593 5393
T: General enquiries: 0370 000 2288
E: misconduct.teacher@education.gov.uk

Independent Schools Inspectorate:

Address: Ground Floor, CAP House, 9-12 Long Lane, London, EC1A 9HA
Telephone: 020 7600 0100

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WESTMINSTER ABBEY CHOIR SCHOOL

SAFEGUARDING POLICY DOCUMENT

**This policy is published on the Choir School's website.
It is reviewed annually by the Full Governing Body.**

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Legislation and statutory guidance

This policy is set within the framework of and has regard to:

- The Children's Act 1989 and 2004
- The Education Act 2002
- [Department for Education \(DfE\) Guidance "Keeping Children Safe in Education" \(KCSIE\) September 2025](#) (including [Disqualification under the Childcare Act 2006](#) (Sept 2018))
- [Working Together to Safeguard Children 2023](#) (WTSC) (December 2023)
- [Information Sharing \(IS\) advice for Safeguarding Practitioners](#) (May 2024)
- London Child Protection Procedures Updated: [31st March 2025](#)
- [National Minimum Standards for Boarding Schools](#) (5 Sept 2022)
- [Education \(Independent School Standards\) \(England\) Regulations 2014](#)
- [What to do if you are worried a child is being abused – Advice to practitioners](#) (DfE) March 2015
- [The Prevent Duty Guidance: for England and Wales - Updated 31 December 2023](#)
- [The Prevent Duty: safeguarding learners vulnerable to radicalisation - Updated 7 Sep 2023](#)
- Female Genital Mutilation Act (2003) as inserted in section 74 of the Serious Crime Act (2015)
- [Mandatory reporting of female genital mutilation: procedural information updated 22 January 2020](#)
- [Multi-agency statutory guidance on female genital mutilation - GOV.UK](#)
- [Relationships and sex education \(RSE\) and health education - GOV.UK](#) For teaching until 31 August 2026) (2019, updated September 2021)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\) 23 March 2022, Updated 10 March 2025](#)

- [The advice to schools in Mental Health and Behaviour in Schools](#): DfE Nov 2018
- [Use of Reasonable Force in Schools Guidance](#): DfE July 2013
- [The Rehabilitation of Offenders Act 1974](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Generative AI: product safety expectations - GOV.UK](#) Published 22 January 2025

The policy operates in the context of the obligations arising under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty)

Related Safeguarding Policies

This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- S22: Anti-bullying
- S01: Admissions & Absences
- S03: Behaviour, Discipline & Exclusions
- S04: Parent Complaints Procedure
- S06: Data Protection Policy and Privacy Notice
- S35: Emergency Response Plan
- S09 Health & Safety Management and Risk Assessment
- S11b: Low Level Concerns
- S34 Staff Interaction with Pupils
- S49 Adults Staying in School Residential Accommodation
- S69: Online safety
- S13: Relationships and Sex Education
- S16: Staff Recruitment and Selection
- S41: Positive Handling and Restraint Policy
- S70: School Staff and Governors ICT AUP
- S57: Code of Conduct for School Staff
- S52: Whistleblowing

Definitions

In line with 'Working Together to Safeguard Children' 2023 and KCSIE (2025), safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes.
- **Child protection** is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse
- **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
- **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- **Children** includes everyone under the age of 18.
- The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
 - The local authority (LA)
 - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - The chief officer of police for a police area in the LA area
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use

(especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Westminster Abbey Choir School acknowledges that safeguarding includes a wide range of specific issues including, but not limited to:

- Abuse and neglect
- Bullying, including cyberbullying
- Child-on-child abuse
- Children with family members in prison
- Children who are absent or missing from education
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, also known as youth-produced/involved sexual imagery or "Sexting"
- Online safety
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- 'Upskirting'

(Also see Part One and Annex B within 'Keeping Children Safe in Education')

Introduction

There are five main elements to our policy, which applies to all staff, governors and volunteers working in the school:

- Ensuring that we practise safer recruitment in checking the suitability of staff and volunteers to work with children.
- Raising awareness of safeguarding issues and equipping children with the skills needed to keep them safe.
- Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse, neglect and exploitation.
- Supporting pupils who have been abused in accordance with their agreed child protection plan.
- Establishing a safe environment in which children can learn and develop and in which all systems, processes and policies operate with the best interests of the child at heart.

We recognise that, because of their day-to-day contact with children, staff and volunteers are well placed to observe the outward signs of abuse, neglect and exploitation. The school will therefore:

- maintain an attitude of 'it could happen here' where safeguarding is concerned.
- when concerned about the welfare of a child, staff will always act in the best interests of the child.
- establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- ensure that children know that there are adults in the school whom they can approach if they are worried
- ensure that all staff members undergo safeguarding training at induction in line with advice from the Local Safeguarding Children Partnership (LSCP). The training will be regularly updated.
- include opportunities in the Personal Social Health and Economic (PSHEE) and RSE curricula and elsewhere for children to develop the skills they need to recognise and stay safe from abuse.

We will follow the procedures set out by the Bi-borough's LSCP and take account of guidance issued by DfE to:

- ensure that we have a Designated Safeguarding Lead (DSL) and a deputy Designated Safeguarding Lead for safeguarding both of whom have received appropriate training and support for this role
- ensure that we have a named member of staff to oversee the Prevent Duty who has received appropriate training and support for the role
- ensure that we have a Nominated Governor (NG) responsible for safeguarding who has received appropriate training and that all governors receive appropriate safeguarding and child protection training so that they can provide strategic challenge
- ensure that every member of staff (including temporary and supply staff and volunteers) and of the governing body knows the name of the Designated Safeguarding Lead responsible for safeguarding and his/her role
- manage behaviour effectively to ensure a good and safe educational environment and have a clear understanding of the needs of all pupils, including those with mental health needs

- safeguard children from potentially harmful and inappropriate online material via the school's filtering and monitoring systems, and via its online safety policy and acceptable use of the internet policies (boys are not allowed mobile phones or personal internet enabled devices in school) that are regularly reviewed by the Governors
- ensure that all staff and volunteers understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the Designated Safeguarding Lead responsible for safeguarding
- ensure that all staff are prepared to identify children who may benefit from early help. (i.e., providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years)
- ensure that parents have an understanding of the responsibility placed on the school and staff for safeguarding by setting out the relevant obligations in the parents' handbook
- notify Social Services if there is an unexplained absence of more than two days of a pupil who has a child protection plan (unless the plan requires more immediate notification)
- develop effective links with relevant agencies and cooperate as required with their enquiries regarding safeguarding matters including attendance at case conferences
- keep written records of concerns about children, even where there is no need to refer the matter immediately
- ensure that all records are kept securely, separate from the main pupil file and that safeguarding files are transferred to the new school or college as soon as possible when the pupil moves school
- develop and follow procedures where an allegation is made against a member of staff or volunteer
- ensure that safer recruitment practices are always followed.
- ensure that there are arrangements for reviewing the school's safeguarding policies and procedures, and the efficiency with which the related duties have been discharged
- ensure that any deficiencies in safeguarding arrangements are remedied without delay
- Staff should receive regular and relevant training on safeguarding expectations including those related to their role in the filtering and monitoring of the school network and devices used in school.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through

- the content of the curriculum
- the school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued
- the school behaviour policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but that he is valued and not to be blamed for any abuse that has occurred
- liaison with other agencies that support the pupil such as social services, child

and adult mental health service, education welfare service and educational psychology service

- ensuring that, where a pupil with a safeguarding plan leaves WACS, his information is transferred to the new school immediately and that the child's social worker is informed.

SAFEGUARDING CORE GROUP

The school is committed to acting always in the best interests of the child. We all have a statutory duty to 'safeguard and promote the welfare of children' by:

- protecting children from maltreatment;
- preventing the 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.

Pupils have the right to protection from abuse, neglect or exploitation. Staff must work towards fulfilling the school's vision of providing a nurturing environment where each child is inspired to learn and discover his potential and to feel safe and secure amongst his peers and staff. It is essential that we maintain effective methods and systems to monitor and review the safety and welfare of pupils and staff.

Safeguarding Core Group

Designated Safeguarding Lead (DSL)

Deputy DSL (DDSL)

Nominated Governor (NG)

Chairman of Governors (CoG)

Contact details are given on page 2.

The school will operate its policy in accordance with Westminster City Council's inter-agency procedures. See London Child Protection Procedures (Updated 25 April 2024) a copy of which is available from: <https://www.londoncp.co.uk/>

Responsibilities of the Designated Safeguarding Lead (DSL)

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for safeguarding and child protection remains with the DSL. This responsibility cannot be delegated.

During term time the DSL and/or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school, they will be responsible for ensuring as far as is possible pupils' safe use of IT with particular reference to on-line safety. It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE.

The other broad areas of responsibility for the Designated Safeguarding Lead are:

Promoting the welfare of children:

They will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Managing referrals:

They will refer all cases of suspected abuse to the local authority children's social care and the designated officer(s) for safeguarding (all cases which concern a staff member), the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or Police (cases where a crime may have been committed). They will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. They will keep detailed, accurate, secure written records of concerns and referrals.

Training:

Undertaking appropriate training carried out every two years in order to understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments. They will need to have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so. In addition to the formal training, as set out above/their knowledge and skills will be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to the role.

They will also ensure that each member of staff has access to and understands the school's safeguarding policy and procedures, especially new and part-time staff and, to the extent necessary, volunteers. They will ensure that staff have suitable training to be alert to the risks of radicalisation and will have sufficient training to be able to provide advice and support for others.

School network monitoring and filtering systems:

The DSL will liaise with the Abbey IT department and choir school IT teacher to ensure the school's network systems are appropriate to the task of protecting pupils. An annual audit will be carried out in line with the guidance set out in:

[Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges-cyber-security-standards-for-schools-and-colleges)

The DSL will also carry out a half termly check, in liaison with the Abbey IT department to review the pattern of sites pupils have been accessing and those that have been blocked as well as potential threats from outside the school.

Raising Awareness:

The DSL will ensure the school's policies are known and used appropriately. They will

ensure that the school's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, working with governors regarding this. They will ensure that the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this. They will link with the local LSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding. Where children leave the school, they will ensure their safeguarding file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained.

In all of the above roles and responsibilities, the DSL and DDSL will, in such a manner as respects the appropriate confidentiality of the children and parents of the Choir School, liaise with Westminster Abbey's Safeguarding Officer to ensure that practices are as aligned across the Abbey as is possible and to benefit from the advice and expertise of that role.

Recruitment of Staff

The school will operate safer recruitment procedures in accordance with guidance in Working Together to Safeguard Children (WTSC 2023) which will include reference to the Independent Safeguarding Authority (ISA), Disclosure and Barring Service (DBS) checks and compliance with Independent School Standards Regulations (ISSR) in order to ensure as far as is possible that staff are suitably qualified to care for children and that we deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities within the school. See the school's policy: S16 Staff Recruitment and Selection and the associated school guidance S42 Recruitment and Selection Procedures and Guidance. Any person whose services are no longer used because they are considered unsuitable to work with children will be reported to the DBS within one month of leaving the school. The school will seek assurance that appropriate safeguarding checks and procedures apply to staff employed by another organisation with whom its pupils are working.

Recognising Child Abuse

It is part of a teacher's responsibility to learn to recognise signs of abuse and to refer any such concerns to the DSL. Staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Staff will be given training to help them to fulfil this role. Appended to this Policy is a document entitled: APPENDIX E Categories of Abuse.

Any signs or symptoms of child abuse should be treated with caution. At times there will be straightforward explanations for injuries or behaviour. It is essential that teachers share their concerns with the DSL. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

Responding to Disclosure:

Appendix B details in full the protocol that staff should follow when responding to pupil disclosures.

- Ensure the child is safe and, if in distress, cared for.

- Reassure the child that you are taking them seriously, that they will be supported and kept safe, and that you are listening and want to help.
- Never give the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor make them feel ashamed for making a report.
- Let the child talk freely; do not interrupt.
- Keep questions open and to a minimum; do not ask leading questions.
- Never promise confidentiality.
- Report the concern to the DSL

Reporting and Recording Disclosures or Concerns:

All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing and reported to the DSL. If members of staff are in any doubt about recording requirements, they should discuss their concerns with DSL. Information is held confidentially and stored securely, in a separate file for each child. Records will include:

- A clear and comprehensive summary of the concern
 - Record verbatim what the child said, as soon as possible after the disclosure; keep the record factual and objective
 - Details of how the concern was followed up and resolved; and
 - A note of any action taken, decisions reached and the outcome.
 - Where there are marks/injury a body map should be completed
- Staff will record any safeguarding concern that they have about a child using the My Concern online safeguarding portal, which immediately alerts the DSL team. Records will be completed as soon as possible after the incident/event, using the child's words.
 - The My Concern safeguarding software is accessible online, via a link on the homepage of the school website.
 - If a member of staff is unable to use the online system, then a paper Incident/Welfare Concern Form (with body map if injuries have been observed) should be completed and handed without delay to the DSL. Back - up copies of Incident/Welfare Concern forms and body maps are kept in the Staff Room and on the shared Choir School Drive: Choir School/ Safeguarding.
 - Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
 - All safeguarding records will be transferred in accordance with KCSIE and data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained. The school will refer to Annex C 'Information sharing and managing the child protection file' regarding the mandated timescales to be followed.
 - The Headteacher will be kept informed of any significant issues by the DSL.

Referring Concerns about a Child

Through staff training and regular communication, the school seeks an environment

where staff feel able to make a referral via the DSL, and are thus supported in their key safeguarding role. KCSIE (2025) makes it clear, however, that ANY member of staff or indeed any concerned individual may make a referral direct to children's social care.

As children's social care assessments should consider where children are being harmed in contexts outside the home, it is important that as much information as possible is provided 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. Additional information is available here: [Contextual Safeguarding](#). Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Partnership. In the absence of the DSL, concerns should be referred to the Deputy DSL who has also been appropriately trained in inter-agency safeguarding work.

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, they should be informed as soon as possible that a referral has been made. In borderline cases the DSL will seek guidance from the social services duty and assessment team (contact details given at the end of this annex). They may also consult the document [NPCC - When to call the police](#) and the flow diagram on page 24 of KCSIE 2025.

On receiving a referral of a child deemed to be at risk the DSL will contact the Local Safeguarding Children Partnership (LSCP) for the Bi-Borough within 24 hours. This will be confirmed in writing within 48 hours of receiving the referral. (Contact details given in the list of external safeguarding contacts) see also <https://www.londoncp.co.uk/>

If no response is received within this timescale, confirmation of receipt will be sought.

It is important to differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies. The former will be reported to children's social care immediately; the latter will be referred via inter-agency assessment procedures, most commonly via a Common Assessment Framework (CAF) and Team around the Child (TAC) approaches. Where because of safeguarding or welfare needs a child needs the assistance of a social worker, the school will work with them to ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes; such a need for assistance will 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).

Where there is a safeguarding concern, the child's wishes and feelings will be taken into account when determining what action to take and what services to provide, this observing the principle that the best interests of the child will always be paramount.

Referrals for pupils who live outside of the Borough of Westminster

Referrals to Children's Social Services (CSS) should be made via the child's home

county Safeguarding Partnership.

To check a child's home county look up their home address postcode:
<https://www.gov.uk/find-local-council>

If in any doubt, and in the case of wanting advice before making a referral, phone the Bi-Borough MASH Support Officers (page 3) who can help advise on what to do.

For international boarders, referrals should be made to the Bi-Borough MASH as host authority.

Early Help

Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.

- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Staff aim to identify children who may benefit from early help through discussions with one of the Designated Safeguarding Leads, with the aim of providing appropriate help and prevent concerns escalating.

- If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.

- Where Early Help is considered to be appropriate, the DSL (or deputy) will contact the Early Help and Family Hub for consultation:
 - [Family Information Hub | Early Help and family support \(westminster.gov.uk\)](https://www.westminster.gov.uk/family-information-hub/early-help-and-family-support)
 - [Family Information Hub | How to access 'Early Help' services \(westminster.gov.uk\)](https://www.westminster.gov.uk/family-information-hub/how-to-access-early-help-services)
- Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment or to aid CSC to conduct a section 17 or section 47 assessment if necessary.
- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Bi-borough Multi-Agency Safeguarding Hub if the situation does not appear to be improving or is getting worse.

Preventing Radicalisation

Westminster Abbey Choir School recognises that children may be susceptible to radicalisation into terrorism. Safeguarding is the responsibility of everyone and all staff have a duty to report to the DSL any behaviour that concerns them as showing signs of an inclination to extremism or radicalisation.

- Westminster Abbey Choir School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- At WACS, the DSL is also the designated member of staff to oversee the Prevent Duty in school. Where deemed necessary the DSL may discuss matters with children’s social care or they may refer the child through the government’s Prevent Strategy to Channel. They may also contact the local police force to talk in confidence and get support and advice.
- In line with Prevent guidance, all staff have received appropriate training to enable them to be alert to changes in children’s behaviour which could indicate that they may need help or protection from extremism or radicalisation.
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the local procedures in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.

See: <https://www.gov.uk/government/publications/prevent-duty-guidance> especially the sector specific guidance for Education in Section 5.

Similar advice is available from the DSL if staff or parents have any concern that a child may be the subject of sexual exploitation, however apparently innocent, via the internet. See also the school’s [S18 Acceptable Use Policy of the Internet and Email](#).

FGM

In an all-boys school, it is very unlikely that staff will be alerted to instances of female genital mutilation (FGM) but should staff become aware that a family member under the age of 18 might be a victim they are required by law to make a report to the Police following procedures set out in Section 2.3 of [Mandatory Reporting of FGM: Procedural Information](#).

Definitions of safeguarding and abuse, and the possible signs and forms of abuse are outlined in Annex B of KCSIE 2025, and definitions outlined in Appendix E of this policy.

Pupils with SEND

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges as additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

Given this, reports of abuse involving children with SEND should involve liaison between the SENCO and DSL and consideration of the need for extra pastoral care

Looked-after and previously looked-after children

WACS will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

At WACS the DSL is the appointed teacher trained to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the Headteacher to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. Refer to our Behaviour, Discipline and Exclusions policy (S03) for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Abuse by one or more pupils against another – child-on-child

All members of staff at Westminster Abbey Choir School recognise that children can abuse other children; this is known as child-on-child abuse and can happen both inside and outside of school/college and online.

All staff recognise that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- gender based violence/sexual assaults or harassment,
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- 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;
- up-skirting (which is a criminal offence), 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.

Staff should be clear as to the school's policy and procedures with regards to child-on-child abuse and they will be trained in how to handle a disclosure of abuse. (See KCSIE 2025 paragraph 156 et seq.). Staff are made aware of types of child-on-child abuse in staff meetings and through electronic communications through the year. We recognise "the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys will be perpetrators' KCSIE) but that all child-on-child abuse is unacceptable and will be taken seriously" – it is equally possible between boys and the absence of reported cases does not mean that such abuse is not taking place, it may simply be that it is not being reported. Abuse is abuse and will not be tolerated or passed off as "banter", "just having a laugh" or "part of growing up": a zero-tolerance approach is taken.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the School's Anti-Bullying policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; (b) where there is an element of coercion or pre planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL or DDSL. Harmful sexual behaviour is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

Any concerns or allegations of child-on-child abuse should be reported to and discussed with the DSL or DDSL. Staff witnessing or receiving an allegation should not investigate the matter but should make notes and pass these to the DSL who will store them securely and separate from the child's educational file. In the event of an allegation of abuse between pupils the DSL will make an immediate needs and risk assessment, which will be recorded, and will normally seek advice from the Westminster Multi Agency Safeguarding Hub (MASH) before responding formally.

Contact details for the MASH are given in the list of external contacts. In most cases the clear guidelines set out in the anti-bullying policy will be followed, but further guidance is given in KCSIE (Part 5) and in the DfE document sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges (Published 14

December 2017 & Last updated 1 September 2021). The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, such abuse will be referred to local agencies with a view to seeking early help. It is anticipated that in the event of a disclosure of pupil-on-pupil abuse, all children involved, whether perpetrator or victim, will be treated as being “at risk” and will be individually supported, usually with a personal staff mentor. It is understood that, as a boarding school, there is increased responsibility to manage sometimes intense personal relationships between peers. Boarding staff must be especially alert to this and such vigilance will be the most effective procedure for minimizing the risk of child-on-child abuse. Staff should also appreciate that children with special educational needs and /or disabilities may be especially vulnerable to child-on-child abuse. Pupils are not allowed mobile phones in school so the opportunity for sexting within school is limited, but advice is available for staff in dealing with the issue if it is suspected outside school: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DfE Published 23 December 2020, updated March 2024)

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language such as using sexism or homophobic language or inappropriate behaviour between peers, including requesting or sending sexual images, and educating pupils about these areas in RSE lessons
- Be vigilant to issues that particularly affect different genders – for example initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems as set out in our Anti-Bullying Policy (S22) and discussed in PSHEE and assemblies
- Ensure staff reassure victims that they are being taken seriously and that they can safely express their views and give feedback
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation

- A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation and that LGBT children can be targeted by other children: in these circumstances having a trusted adult and being able to share their concerns is vital
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

Nude and/or semi-nude image sharing by children

- WACS recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
 - to report any concerns to the DSL immediately.
 - never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - not to delete the imagery or ask the child to delete it.
 - to avoid saying or doing anything to blame or shame any children involved.
 - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
 - to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’ and the local Bi-Borough guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.

- Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- A referral will be made to the Bi-Borough MASH and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure if a request for support is appropriate, advice may be sought from Bi-Borough Education Service.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- WACS recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- WACS recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- WACS recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example 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 and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

Mental Health

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

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy

Arrangements for dealing with allegations of abuse against teachers, volunteers and other staff

In the event of an allegation made against a member of staff, supply teacher or volunteer, that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in the school the headteacher will follow guidance from Part 4 of KCSIE. This will be the case where the allegation is that they have:

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

A quick resolution of an allegation is a priority for all concerned. All allegations must be reported straight away to the headteacher. If the headteacher is temporarily unavailable the report should be addressed immediately to the LADO. In addition, if an allegation is made to a member of staff concerning inappropriate behaviour by the headteacher staff must report it immediately to the Chair of Governors without notifying the headteacher.

In all other cases the DSL or headteacher will speak to the child/children involved, without in any way investigating the allegation; they will make notes and, if the allegation is not withdrawn, they will report it immediately to the Chair of Governors. The school will not undertake its own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO – now known simply at the 'Designated Officer') or in the most serious cases, the police, so as not to jeopardise statutory investigations.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police. In any event, the Designated Officer will be informed within one working day of all allegations that come to the school's attention or that are made directly to the police.

Once a course of action has been agreed with the Designated Officer discussions will be recorded in writing and communication with both the individual and the parents/carers of the child/children agreed. The school will consider carefully whether

the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Suspension will NOT be an automatic response. If the allegation is against a member of the resident staff, the school will normally provide accommodation away from the pupils while the matter is being dealt with by the Local Safeguarding Children Partnership (LSCP). There are restrictions on the reporting or publishing of allegations against teachers so the school will make every effort to maintain confidentiality and guard against unwanted publicity up until such time as the accused person is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

The school will promptly report to the Disclosure and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used and for whom the DBS referral criteria are met. Even if a referral to DBS is not warranted, the Chair of Governors will consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed or would have been dismissed had they not resigned and a prohibition order may be appropriate. Guidance on what would warrant such a referral is available on the TRA website.

In the event of a substantiated allegation against a member of staff, the school will work with the Designated Officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Low level concerns

Low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

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

If a teacher or member of staff has concerns about the behaviour of another member of staff (including supply staff and volunteers) towards a pupil, he or they must report it at once to the Headteacher, following the procedures in the school's S11B Low Level Concerns Policy. Where the low-level concern relates to the Deputy Head, this should be reported directly to the Headteacher by email due to the Deputy Head also having access to Confide. Where the low-level concern relates to The Head, or where there is a conflict of interest in reporting the matter to The Head, this should be reported directly to the Dean as Chair of the Governing Board, via the Dean's PA (refer S11B Low Level Concerns Policy for contact details).

Any concern will be investigated. If there is evidence of criminal activity, the Police will always be informed.

Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice, and potential failures in the school's safeguarding regime. They should also have confidence that all such concerns will be taken seriously by the governance and senior leadership of the school. The school's S52 Whistleblowing Policy provides

guidance as to how such concerns may be raised. If as a result of any investigation into safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children, a person in regulated activity is dismissed or removed, or would have been had they not resigned, a referral to the Disclosure and Barring Service (DBS) will be made.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them.

The NSPCC Whistleblowing Advice Line is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call the helpline 0808 800 5000 between 11:00am to 3:00pm, Monday to Friday, or email: help@nspcc.org.uk.

Training

All staff members will receive appropriate safeguarding training which is regularly updated. In addition to formal re-training sessions, they will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The DSL and Deputy DSL will undertake relevant training in safeguarding and inter-agency working at least every two years. All staff are given a copy of Part One of KCSIE (together with Annex B) which they are required to read and signify that they have understood. New staff will additionally be given guidance on their responsibilities and a comprehensive talk as to how the school system operates. Details of that training are set out in the Staff Induction Policy (see Appendix 1). Guidance will also be given to all staff to ensure as far as is possible that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil, for example in one-to-one dealings with children.

See also Policy, S34 Staff Interaction with Pupils, S57 Code of Conduct for School Staff. Pupils will also be taught about safeguarding, including online safety, through a broad and balanced curriculum. This may include covering relevant issues through ICT, personal, social, health and economic education (PSHEE), tutorials and/or through relationship and sex education (RSE). Boys will be advised what to do if they are worried about something or if they suspect that they or another boy is in any sort of danger. Opportunities will be made in Tutor or Form Circle Time to discuss any concerns boys may have. Senior boys are given a special briefing by the headteacher as to their important role in safeguarding within the school.

Musical Tuition and Performance off Site

Tuition will not normally be given off site, and where it is, parents will be responsible for all aspects on a private basis. It will be made clear that the school can accept no responsibility for making such arrangements unless school staff are engaged. An individual risk assessment will be made for any performances given outside Westminster Abbey and this will include arrangements for safeguarding. In all cases, school or Abbey staff will accompany pupils.

Missing Pupils

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

In the event of a pupil going missing or being absent from school for a period of time, the school will operate its [S38 Missing Pupil Policy](#) which outlines exactly what would happen and who would be contacted at each stage of the process. Any pupil who goes missing or is absent on repeated occasions will be considered to be 'at risk' and the DSL will advise about appropriate support. Where the school has concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. If a pupil ceases to attend the school, before the child's name is re-classified on the admissions register, the Headteacher will satisfy themselves that he has been officially registered at another school. If the headteacher is unable to identify a new school they will contact the local education authority in which the boy's parents live and the Bi-Borough to report the fact before adjustments to the register are made. See also guidance in the government's [Children Missing Education](#).

Confidentiality and Information Sharing

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. However, all confidential issues relating to children and young people should be dealt with on a *need-to-know* basis. Therefore, only specifically relevant information should be passed on to the recipient, who in turn may not pass this information on to another individual, without consulting the informant.

The school will contact the previous school of new boys to ascertain whether there have been safeguarding concerns and the DSL will request copies of any relevant reports. Along with all other Safeguarding reports these will be kept securely and separately from personal files.

All information given by the child is confidential at all times and once a report is made any further action taken will not be disclosed to members of staff. Before a referral to Social Services is made, an assessment of disclosure will be carried out by the DSL who can seek advice from the lead officer for Safeguarding Schools & Social Care. If a child does not consent to the disclosure of information, then the DSL can override the duty of confidentiality in order to safeguard the welfare of the child. If appropriate, consent can be gained from the parent if this is deemed not to put the child at risk.

Only relevant members of staff in school need to know the details of concerns relating to a child in need i.e., the DSL, Form Teacher or Tutor, Matron and anyone involved in monitoring particular aspects of a child's behaviour. The boy concerned should also know which teachers/staff are in possession of what information, when it will be shared, why and with whom.

Staff and governors will have due regard to the relevant data protection principles, which allow one to process, share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). This includes:

- being aware that the the Data Protection Act and GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- 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. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- Westminster Abbey Choir School has an appropriately trained Data Protection Officer (DPO) as required to ensure that our school/college is compliant with all matters relating to confidentiality and information sharing requirements. The DPO is the DPO for the whole of Westminster Abbey, and this post is held by the Head of Human Resources, currently Temi Olusola contact: temi.olusola@westminster-abbey.org.
- All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
- KCSIE, the [Information Commissioner's Office](#) (ICO), DfE [Data Protection in schools guidance](#) and DfE '[Information sharing advice for safeguarding practitioners](#)' guidance provides further details regarding information sharing principles and expectations.

Parents

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with them. However, concerns of this nature must be referred to the DSL, who will decide on the appropriate response. In a very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases, advice will be sought from the Local Safeguarding Children Partnership (LSCP).

Monitoring a Child

The DSL or, if a Common Assessment Framework (CAF) has been used, the Lead Professional will set a timescale for monitoring a child about whom a concern has been expressed (approximately half a term or 6–8 weeks). If no indicators are found or appear to develop, the monitoring will cease. If indicators and concerns continue, appropriate action will be taken and recorded. As part of good practice, parents/carers will be advised that their child is to be monitored and involved in the process as much as possible. If a child is on a Child Protection Plan information will be shared with the Social Services.

Any deficiencies or weaknesses identified in the school's safeguarding arrangements

will be remedied without delay in consultation with the LADO / Children's Services. The LADO is able to provide advice and they presides over the investigation of any allegation or suspicion of abuse directed against anyone working in the school.

The Governing Body will undertake an annual review of the school's Safeguarding Policy and procedures and of the efficiency with which the related duties have been discharged. This will take the form of an annual report by the DSL and Headteacher to the Governors and scrutiny of the records and procedures by the Nominated Governor.

Online Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private

- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#) and in the School's policy S51 Searches and Confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to S69 Online Safety Policy which can be found on the school website.

APPENDIX A: TRAINING FOR NEW STAFF AND VOLUNTEERS

(Also S45 Training for New Staff on Child Protection / Pupil Welfare)

Welcome to Westminster Abbey Choir School. Every new member of staff is given an induction programme that is tailored to his or her roles and responsibilities. All new teaching staff are allocated a mentor in their first year whose role is to provide informal support and assistance. We hope that your induction programme will help you to settle into the school as quickly as possible, so that you feel that you can make an effective contribution to the life of the school.

One aspect of your induction training involves guidance in handling child protection issues. You will be given a copy of the DfE's guidance document, Part 1 (or Annex A as appropriate) of Keeping Children Safe in Education (KCSIE 2025) which you should read carefully. The following notes (which are reproduced in the Safeguarding Policy) highlight some of the most important principles and procedures.

INTRODUCTION

In any school, safeguarding must always be the top priority. Every member of staff needs to be confident that they understand their role in keeping children safe, promoting the welfare of pupils, promoting equal opportunities and inclusion, and preventing bullying and harassment. Training is therefore crucial in raising awareness of potential safeguarding issues and in giving staff confidence to know how to respond in potentially difficult situations.

Every new member of the teaching and non-teaching staff, including new peripatetic musicians, is given such training. It is normally in the form of a session led by the Designated Safeguarding Lead and every effort will be made to hold such a session within the first week of a new member of staff arriving at the school. Similar training is offered to anyone else whose activities bring them into regular contact with children. All new employees of Harrisons, the firm that runs our catering, are also given training in safeguarding. In addition, staff will be encouraged to take the online training provided by Educare and they will be given regular update training. The only adults who work or visit the school who are exempted from this requirement are:

- Occasional visitors, including occasional lecturers and contractors, who sign in and are given a security badge, who are escorted throughout their visit,
- Registered school inspectors whose credentials have been checked,
- Contractors working on a designated site that is physically separated from pupils, who are required to sign in and out at their site office and to wear security badges at all times,
- Contractors or other visitors working in the school when pupils are not present e.g. during the holidays.

The training involves guidance in handling safeguarding issues. Staff will be given a copy of the DfE's guidance document, Part 1 and Annex B of Keeping Children Safe in Education (KCSIE 2025) which they must read carefully and sign a declaration to that effect. The following notes highlight some of the most important principles and procedures.

DSL

Miss Chloe McNeely, Deputy Head, is the school's Designated Safeguarding Lead (DSL). She has been trained for the demands of this role and she regularly attends courses with other child support agencies to ensure that she remains conversant with best practice and that our policies and procedures are current and follow that best practice. She receives refresher training at least every two years and she maintains close links with the Local Safeguarding Children Partnership (LSCP) for the Bi-borough of Kensington & Chelsea and Westminster. She reports at least once a year to the governors on safeguarding issues. The Deputy DSL is Dr Emma Margrett, Headteacher, and she has been similarly trained. Mr Robert Gullifer is the governor responsible for safeguarding issues (called the Nominated Governor).

TOPICS COVERED IN THE INITIAL TRAINING

1. Our pupil welfare systems

- The Governors' formal consideration of safeguarding issues once a year, with day-to-day issues being delegated to Robert Gullifer, the Liaison or Nominated Governor for Safeguarding
- The roles of the senior leadership team and the DSL and Deputy DSL
- The weekly pastoral meetings, which include all teaching and resident staff
- The regular monitoring arrangements by the form teachers, tutors and matrons
- The role of the Independent Person
- The training in leadership given to senior pupils
- The role of Circle Time / PSHEE / Tutor Periods
- The role of a counsellor (arranged through the GP practice)
- If applicable, we will describe our arrangements for providing additional support for pupils with SEND and for whom English is an additional language.

2. The Framework for our safeguarding and anti-bullying policies

- Part I of Keeping Children Safe in Education (KCSIE) a copy of which is given to all staff
- School Safeguarding Policy
- Acceptable use of the internet and social networking sites (AUP Policy)
- Anti-bullying policy and procedure
- Behaviour policy and procedure
- Policy and procedure for arranging educational visits out of school (if applicable)
- Code of conduct for school staff
- Interaction with pupils – staff guidance
- Adults staying in boarding houses (if applicable)
- Photography
- Positive Handling & Restraint
- Whistleblowing
- Low Level Concerns
- Missing Children

Attention will be drawn to all the above policies and new staff will be encouraged to familiarize themselves with them. Regularly updated copies are to be found on the Choir School Drive: Policies & Handbooks

Teaching staff have a particular responsibility for supervising pupils and ensuring that they behave with consideration and good manners at all times but all staff need to be made aware of the school's policies in these areas. Of particular importance is online safety and staff are reminded of their important role in helping pupils in building positive relationships, identifying risks and keeping everyone safe.

3. Handling disclosures of abuse, neglect and exploitation

We draw on national guidance relating to safeguarding and protecting children; we note some of the signs of abuse, and the duties of staff, as well as the role of specialist agencies. We will explain our expectations of how staff should respond in difficult situations, and why they cannot promise confidentiality to a pupil. (See: S34 Interaction with Pupils Policy)

4. Visitors and Site Security

This covers the need for visitors to be signed in at Reception and to be escorted about the school.

5. Effective Record Keeping

Why effective record keeping matters and where and how records are kept. This will also cover training in use of the school's safeguarding reporting system - MyConcern.

6. Refresher Training

The session concludes with reminding staff that refresher training is given usually at yearly intervals along with termly updates and by inviting all staff, governors and volunteers to certify in writing that they have completed and understood the training session.

Please sign and return to the Headteacher:

SAFEGUARDING INDUCTION PROCEDURES in Westminster Abbey Choir School

I _____ have attended an induction session on Safeguarding Procedures. As a result, I have received a copy of KCSIE 2025 (Part 1 & Annex B) and I:

(a) am familiar with the following:

- (i) Anti-bullying Policy (S22)
- (ii) Acceptable use Policy for the Internet and Email (S18)
- (iii) Safeguarding Policy (S11)
- (iv) Behaviour, Discipline and Exclusions Policy (S03)
- (v) School Journey and Educational Visits Policy (S43)
- (vi) Staff Interaction with Pupils – Staff Guidance (S34)
- (vii) Code of Conduct for School Staff (S57)

(b) am aware of procedures for Safeguarding at Westminster Abbey Choir School.

(c) know that Miss Chloe McNeely is the Designated Safeguarding Lead (DSL) and that I can discuss any concerns that I may have with them. In their absence or alternatively I can consult the Deputy DSL, Dr Emma Margrett.

(d) know that further guidance, together with copies of the above policies are available on the Choir School drive.

(e) understand the responsibilities of staff in this area, and I have considered issues that may arise.

Signed _____ Date _____

APPENDIX B: GUIDANCE ON DEALING WITH SAFEGUARDING ISSUES AND RESPONDING TO PUPIL DISCLOSURES

If a Pupil reports a concern

Pupils who have a problem are encouraged to speak to an adult whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A pupil who is insistent upon confidentiality should be referred to an external source, such as ChildLine (details are given in the booklet S65 Boarding Handbook for Pupils, a copy of which is given to each boy annually). If the pupil is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the DSL with a written account of what has transpired as a matter of urgency.

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).

If a pupil decides to speak to a member of staff about the fact that either he, or a pupil known to him, is being bullied, harassed or abused, the member of staff should:

- React professionally, and remember that in the case of possible abuse (s)he is not carrying out an investigation, (which is a task for specialists),
- Take what the child says seriously and calmly without becoming emotionally involved,
- Make it clear why unconditional confidentiality cannot be offered,
- Explain that any adult member of staff is obliged to inform the DSL, if safeguarding issues are involved, in order that specialist help can be arranged.
- Encourage the pupil to speak directly to the DSL if the matter is sufficiently serious,
- Explain that only those who have a professional “need to know” will be told, and, if appropriate, measures will be set up to protect the pupil from retaliation and further abuse,
- Reassure the child that he was right to tell, and that he is not to blame for having been bullied or abused,
- Allow the child to tell their own story, without asking detailed or leading questions,
- If the matter concerns child-on-child bullying, explain how the school anti-bullying policy works and what the next steps will be,
- Record what has been said as soon as is possible using the MyConcern platform
- If the matter constitutes a serious safeguarding incident, inform the DSL as soon as possible - at least by the end of the morning/afternoon session of that day. If the DSL is unavailable, inform the deputy DSL.
- Inform the Headteacher immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the school, or on a school trip. (If the headteacher is unavailable – or is involved - the Chair of Governors should be told immediately rather than referring to the DSL).

Where there are evident signs of physical injury that may (or may not) be the result of abuse or bullying, medical help should be summoned. In serious cases, the Police

should be informed from the outset. For detailed guidance see the full Safeguarding Policy above.

Role of School Medical Staff

At WACS we recognize that medical staff may have their own specific procedures for handling various situations. However, it is imperative that any safeguarding concerns identified by medical staff are promptly escalated to the Designated Safeguarding Lead (DSL). This ensures that all safeguarding issues are managed consistently and in accordance with our school's safeguarding policy. This collaborative approach helps maintain a safe and supportive environment for all children in our care.

Promoting Awareness of Safeguarding and Wellbeing

Our curriculum and pastoral systems, enhanced by the form and tutor systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that pupils relate well to one another and feel safe and comfortable within the school. We expect all teaching and medical staff to lead by example, and to play a full part in promoting an awareness (that is appropriate to their age) amongst the pupils on issues relating to health, safety and well-being. All staff, including non-teaching staff, have an important role in insisting that pupils adhere to the standards of behaviour set out in the behaviour policy and in enforcing our anti-bullying policy. Resident house staff have a particularly important role to play.

Time is allocated in PSHEE classes, in tutor groups and in Form time for discussions as to what constitutes appropriate behaviour and why bullying and lack of respect for others is never right. Assemblies, drama and RS lessons are used to promote tolerance and mutual respect and understanding. The ICT curriculum teaches boys about the unacceptability of cyber bullying and abusive behaviour and to promote the safe use of the internet and mobile phones, inside and outside school.

APPENDIX C - SPECIFIC GUIDANCE FOR STAFF ON INTERACTION WITH PUPILS

While it is vital that staff develop positive relationships with the pupils in their care, they need to ensure that their behaviour does not inadvertently lay them open to allegations of unprofessionalism or even abuse. They need to be seen to treat all pupils professionally and with respect.

Physical Proximity

It is sensible to try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental or singing lesson/rehearsal or in a personal tutorial etc, it is good practice to ensure that others are within earshot, that the room in which they are meeting is not so private that no one else is likely to use it and it should have windows that allow others to see in. Where possible, a gap should be maintained between teacher and child at all times.

Pupils should not be picked up (unless medically necessary or being restrained), nor should they be allowed to sit on a member of staff's lap. They should be gently discouraged from hugging school staff, though staff may consider that there are occasions when such comfort is appropriate and professionally sound. Any such occasion should be reported by the member of staff using Confide. Any physical contact should be the minimum required for care, instruction or restraint. This is also relevant in singing lessons, Alexander Technique lessons or other instrumental lessons when a degree of physical contact may be necessary. The teacher should always ensure that the child feels comfortable with the physical contact. For example, they should say something like, "Do you mind if I touch you here....?" The teacher must ensure that such contact does not ever breach professional boundaries.

Only in special circumstances and with the agreement of the head may private cars be used. If this is the case, it is important that staff check that their private car insurance is valid for business use and that they have completed the school's insurers driver declaration (available from the Bursar). Staff are also advised to avoid any situation which could give grounds for an allegation against their professional conduct. They should avoid a situation where an individual child might be alone with them in a vehicle, for example. See also: S35: Interaction with Pupils – Guidance for Staff.

In a small and personal school such as this it is very easy for staff and boys to get to know one another very well indeed. That is just as it should be, but staff must always keep a professional distance. They should avoid any suggestion of showing favouritism and they must maintain the demeanour of a responsible adult professional rather than that of an equal or friend.

Staff accommodation is strictly out of bounds to pupils and no member of staff should share sleeping accommodation with pupils or invite them to their home. The ground floor of the Headteacher's House is used as an area for pupil activities, but only when accompanied by a member of staff. There are clear signs and a stairgate designating that access beyond the ground floor is not permitted.

See also Policies: S34 Staff Interaction with Pupils, S49 Adults Staying in School

Communication with Pupils

Staff should not give their personal mobile phone numbers to pupils, nor should they communicate with them by text message, social networking site or personal email. For their own safety, they should maintain this professional distance even after a pupil has left the school, while he is still of school age. Staff may of course use the school email system to communicate with pupils for matters relating to school. The Group Leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her. Except in cases of emergency, a school mobile phone should be used for any contact with pupils that may be necessary. If pupils' personal mobile phones have been used, the Group Leader will delete any record of their numbers at the end of the trip or visit.

Physical Restraint

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself or on another, and then only as a last resort, when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the headteacher using Confide. See also S41 Restraint Policy.

Photography

Parents have given consent to their child's photograph being used in external news or publicity material for the Choir School or the Abbey. It is the school's policy not to use a photograph and a name together, except in those publications distributed internally and to parents. In special circumstances where it is appropriate to provide a photograph and identify a particular pupil by name externally, the school will first seek consent from parents.

It is permissible for staff to take photographs of pupils engaged in *bona fide* school activities for the purposes of record keeping and for display around the school. Staff are not permitted to store images of pupils on personal computers, phones, cameras or other electronic devices. Photographs of school pupils should only be taken on school registered devices. The use of cameras on mobile phones is not allowed in washing and changing areas, or in the dormitories, nor should photography be used in a manner that may offend or cause upset. The misuse of cameras in a way that breaches our anti-bullying policy is always taken seriously and may be the subject of disciplinary procedures. The school expressly prohibits the use of images of the school or its pupils on any external website (other than the school's or Abbey's own websites or channels) such as personal accounts on YouTube, Twitter, Facebook, Flickr etc. Staff are however able to 'like' content on official channels from their personal accounts should they wish to do so, but should never communicate with pupils either publicly or privately on these accounts. See also S48 Use and Storage of Images of Children Policy.

APPENDIX D: ONLINE-LEARNING ADDENDUM

There may be times during the academic year when the school, a class or individual boys may have a period of working at home being taught online. This appendix offers guidance in such circumstances.

This addendum to the Safeguarding Policy is to be read in conjunction with the following Policies whose provisions inform and govern the school's online learning activities and provision:

S18: Acceptable Use Policy for the Internet and Email

S22: Anti-Bullying Policy

S23: Bullying for all Pupils

S48: Use and Storage of Images

S69: Online Safety Policy

Reporting Concerns

All staff must continue to act on any concerns they have about a child immediately. It is still vitally important to do this, both for children still attending school and those at home.

The DSL will continue to be available to anyone who has a concern about safeguarding as per the details on page 3. If they are unavailable, the Deputy DSL may be contacted. One of the DSL and Deputy DSL will be contactable at all times that online teaching is taking place.

If a pupil feels that they have been subject to online bullying or child-on-child abuse they should follow the procedures set out in the school's policies on Bullying (S22 & S23).

Attendance

A daily register will still be taken each morning and staff will keep records of boys' attendance at timetabled lessons, informing the school office if a boy does not attend an online session. The school will liaise closely with parents in relation to attendance and ask for their cooperation by ensuring that any illness preventing online attendance is communicated to the school.

Teaching and Learning

Teaching will be only be conducted by employees of Westminster Abbey who are in possession of a DBS certificate in accordance with the provisions of the wider safeguarding policy.

Teaching will be carried out both online and independently in pupils' homes. Where online provision is made, this will be carried out on Microsoft Teams only unless the situation has been notified to and approved by the Headteacher and DSL.

Ratios & Contact

With the exception of music & speech lessons, teaching will not ordinarily be carried out on a one-to-one basis. In guided academic lessons some short 1:1 assistance may be given on occasion. All lessons will be initiated by a member of Abbey staff via MS Teams and never by a pupil.

Recording of Lessons

With the consent of parents, not unreasonably to be withheld, WACS employees may record lessons conducted on a one-to-one basis for the purposes of monitoring and safeguarding. These will not as a matter of course be shared with pupils or their parents but retained for the purpose of ensuring pupils' safety. These files will be held on the MS Teams systems on the Abbey's servers. All staff will be contacted to give their consent to this element of the policy so as to comply with the personal data provisions of GDPR. Files stored on the Abbey's servers will be deleted at the end of the term following that during which they were created.

Remote Teaching Lead

The Headteacher will be responsible for the timetabling and supervision of online teaching and will communicate relevant appointments to teachers and pupils. The headteacher will be able to log in to any teaching session being conducted on MS Teams whether on an ad hoc basis or in response to any concern that may be raised.

E-mail Communication between Staff and Pupils & Generally

E-mail communication between staff and pupils will only be permitted via the Abbey e-mail addresses of the staff and the Abbey e-mail addresses of pupils. These will either end with @westminster-abbey.org or school.westminster-abbey.org.

Communication between parents and staff will be between Abbey e-mail addresses and those already held or subsequently notified to and verified by WACS. E-mail communication can and will be monitored by authorised members of the IT department and WACS Safeguarding Officers to keep oversight of content and participation in teaching and learning. All e-mails are filtered by the Abbey's Mimecast filtering system. Boys are only able to send e-mails to Abbey e-mail addresses and those added to a Safe Senders list (parents & guardians and such other parties as are approved by WACS).

Where?

If the member of staff is teaching from home they are to teach from a study or other daytime room. Pupils attending a Teams session must be in a public part of their home and only in exceptional circumstances be in their bedroom, this will have been agreed by the Headteacher.

How – online behaviour?

Staff teaching on Teams must be dressed professionally as they would ordinarily be in WACS. Pupils are to be dressed smartly but casually. Pupils and staff are to observe the same standards of behaviour and professionalism as if they were teaching within the precincts of Westminster Abbey and as set out in the school's other policies. Specifically, the School will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of child-on-child abuse. Staff will continue to act on any concerns they have immediately – about both children attending any school setting and those continuing their education at home.

Mental Health

The school will continue to offer emotional support to the boys although this will be less easy than usual. The School's Independent Person whose details are posted around school and are shared with parents in the Parent Handbook.

When setting expectations for pupils learning remotely and not attending school, staff will bear in mind both children's and adults' mental health and regularly review the

provision being made and how the children are adjusting to it.

Particularly, staff will be alert to signs of boys' mental health being affected by online learning by looking for indicators such as:

- Boys not completing assigned work or logging on to school systems
- There being no contact from children or families
- Boys seeming more withdrawn during any class check-ins or video calls

Online Safety

It is perhaps more important than ever that parents are aware of the potential risks to children online and the importance of staying safe online. The school will keep children informed about what their timetable is and which parts of it are to be conducted online, including what sites they will be using and who they will be interacting with from the school.

The school has an Online Safety policy, available on the school website.

Should parents need additional support to keep their children safe online, please contact the Headteacher.

A good site in relation to online safety is <https://www.internetmatters.org/parental-controls/>

APPENDIX E: CATEGORIES OF ABUSE & DEFINITION OF KEY TERMS

All staff should be aware that abuse, neglect, exploitation and other 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.

Westminster Abbey Choir School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school/college leaders and staff who work directly with children will read Annex B of KCSIE which contains important additional information about the following specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in this policy and speak with the DSL or DDSL.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- 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 is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Radicalisation: refers to the process by which a person comes to support terrorism and forms of extremism. Persons may be susceptible to radicalisation into terrorism in many different ways and in many different settings. Staff must have regard to the legal duty to prevent children from being drawn into terrorism.

Children Missing or Absent from Education: All staff should be aware that children going missing or absent from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of an underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Domestic Abuse (DA): 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 if they 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. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Domestic abuse can take place within different types of relationships, including ex-partners and family members. There is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation. Domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences. It is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): are forms of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

As a school we encourage and are alert to the benefits of early intervention, mentoring, vertical tutor groups, form time and learning support and where appropriate, the use external specialist support for individual pupils. Staff, in consultation with parents, may also make a referral to Child and Adolescent Mental Health Services (CAMHS).

Serious Violence: All staff should be aware of indicators which may signal those children are at risk from or involved with serious violent crime. These may include:

- Increased absence from school
- Change in friendships or relationships with older individuals
- Decline in performance
- Signs of self-harm or change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts.

There is a range of risk factors that increases the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such

as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Advice to schools and colleges on gangs and youth violence](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

Modern Slavery: 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 Statutory Guidance: [Modern slavery: how to identify and support victims](#).

If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

So-called Honour Based Abuse (HBA): So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.

All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fm@fcdo.gov.uk

Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.

- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.
- It will be rare for teachers to see visual evidence, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).
- Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Bi-Borough Children's Services should be informed as appropriate.

Cybercrime: WACS recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

APPENDIX F – SIGNS OF ABUSE

It's not always obvious when a child is being abused. Types of abuse may overlap with one another. KCSIE highlights the fact that abuse can take place wholly online, or that technology may be used to facilitate offline abuse. There may be specific signs or your instinct may tell you something is wrong. Experts can use these indicators to assess how at risk a child is, no matter how small or seemingly insignificant your concern. Below are some of the more common issues and signs.

Worrying signs in a child's behaviour

Being emotionally withdrawn or aggressive are just two signs that NSPCC Helpline advisors think about when they take a call about a child. They are not a sure-fire way of identifying children who have been badly treated but they may indicate some form of abuse or neglect. Staff should refer to the DfE publication What to do if you are worried a child is being abused – Advice for practitioners and the NSPCC website for more information.

Does the child seem 'normal' for their age?

Every child is different. They have their own needs and develop at their own pace. But when you look at them alongside others of a similar age, do they appear to behave as you would expect? If they seem noticeably younger – socially, or in the language they use – or if they seem much older for their age, for example in terms of their sexual behaviour, that may be as a result of an unhealthy relationship with someone.

Do they seem emotionally or socially withdrawn?

Some children are naturally shy. But there's a difference between shyness and being emotionally withdrawn. Children who are emotionally withdrawn have real, chronic trouble expressing how they feel to an adult or to another child. They may refuse to do so, and even go out of their way to avoid talking to or being with others. If a child is emotionally withdrawn, they may be trying to cope with very strong feelings and/or dealing with a powerful distrust of other people.

Are they unusually aggressive?

Is a child often very aggressive, whether physically or in the words they use? They may have been influenced to believe that this is normal behaviour. They may have witnessed violence at home or elsewhere in their life, or feel the need to protect themselves from something.

Are there signs that they may be potential targets for extremism or radicalisation?

There is no one way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. However, many studies show that radicalisation often occurs as young people search for identity, meaning and community. Are there signs of patterns of behaviour that would suggest that a child is engaged, is intent on causing harm or is capable of committing violence.

Worrying signs in a child's physical appearance

Signs of being hurt or dirty are just a couple of concerns that NSPCC Helpline advisors consider when they take a call about a child. They are not a sure-fire way of identifying children who have been badly treated, but they may indicate some form of abuse or neglect.

Does the child seem dirty or smelly?

A child can easily become dirty, when they play sport for example. But if they often seem unclean or smelly for no clear reason, it could be that they are not being given the chance to get clean. Their clothes may not be washed regularly and they may even be denied the chance to have a bath or shower.

Are they bruised or cut in any way?

It's not currently illegal to smack a child but it is against the law to hit them in a way that leaves any lasting mark or **causes injury**. It goes without saying that a parent or carer should never hurt their child in any way, especially if it leaves cuts or bruises on their skin.

Worrying signs in a child's home environment**Is the child left at home by themselves?**

There is no law regarding the minimum age that a child can be left home alone – but it is an offence if doing so leaves them in danger. So, there are many things to consider when you notice a child at home by themselves. Assessors will think about their age and maturity, as well as **how long and how often the child is left alone**. For example, a child under the age of 12 is probably not able to cope by themselves in an emergency. Whilst it might be fine to leave a 16-year-old alone for an evening, it would not be right for them to be left alone for a week.

Are they left out late at night?

It's a normal, healthy part of growing up for a child to play outside with other children and, depending upon their age, with a limited amount of adult supervision. But if left by themselves after what might be considered too long or at a time when they should normally be at home or in bed; they may not be getting the care they need.

Are there unexplained periods of absence from school?

Might the family have had an unexplained trip abroad which could suggest issues of exploitation. Staff should be alert to the possibility of radicalisation, or indeed of a sister being subjected to FGM.

Is their home clean and tidy?

It's natural for busy family homes to be untidy or in need of a clean sometimes. But if it is extremely untidy or often very dirty, a child's health and wellbeing may be at risk. If the family cannot cope with these tasks, then they may not be making sure their child is clean or properly fed.

Worrying signs in a family relationship**Does the child spend time with their family?**

If a child rarely spends time with their family, they may be trying to avoid a situation in which they could be hurt in some way. Or a parent or carer may be failing to properly care for their needs.

Do they seem to have a good relationship?

When seen together, does the child appear comfortable with their parents, carers or other family members? Do they seem to get along? If the child seems very uncomfortable or nervous, they may feel afraid of being too close to a family member. If you see a child acting aggressively towards a member of their family, it may be because they feel the need to distance themselves. It's natural for families to argue now and again. But if you see or hear the child being shouted at violently, or being hit, it's important to act to protect them.

General Symptoms

The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused:

- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g., playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others

These signs are not evidence themselves; but may be a warning, particularly if a child exhibit several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Material taken from NSPCC and KCSIE

APPENDIX G – FLOW DIAGRAM FOR REPORTING SAFEGUARDING CONCERNS

