



Safeguarding Policy

This policy is made available to parents / guardians of all girls, day and boarding, on the School website, in the Student/Parent Handbook and on request from the School Office. It is available to the Staff at the School from the School website, in the Staff Handbook and on request from the School Office. Content of this policy is directly discussed with new staff upon induction into the School.

IMPORTANT INFORMATION

Designated Safeguarding Lead / Mental Health Lead / Senior Attendance Champion:

Ms Annah Langan (Deputy Head Pastoral)
020 8949 0571 x202 or 07557 271546
langana@marymountlondon.com

Deputy Designated Safeguarding Officers:

Ms Paula Horton (Head of Boarding):
0208 949 0571 x268/242
boardinghead@marymountlondon.com

Mrs Annie Plumridge (Deputy Head of Boarding):
0208 949 0571 x268/242
plumridgea@marymountlondon.com

Ms Laura French (School Nurse)
0208 949 0571 x252
nurse@marymountlondon.com

Independent Listener for Boarders:

Ms Lucy Gibbs: lucy.smith261@outlook.com

Headmistress:

Mrs Margaret Giblin:
0208 949 0571 x222
headmistress@marymountlondon.com

Chair of Governors and Safeguarding Governor:

Ms Umerah Akram:
0208 949 0571
akramu@marymountlondon.com

Deputy Safeguarding Governor:

Ms Niamh Green:
020 8949 0571
green@marymountlondon.com

The telephone numbers of the local Kingston and Richmond Safeguarding Children Partnership are as follows:

Kingston Single Point of Access (SPA): Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is



developing, issues that the parent/carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual or emotional abuse.

SPA can be contacted on the Single Point of Access (SPA) website: <https://kr.afcinfo.org.uk/pages/community-information/information-and-advice/safeguarding-and-child-protection/single-point-of-access-spa>

If a child is in immediate danger, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 0208 547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to on 0208 770 5000. This government website will help identify which local council to report child abuse to and their contact details: <https://www.gov.uk/report-child-abuse-to-local-council>

Local Authority Designated Officer (LADO): Every local authority has a legal responsibility to appoint a LADO who is responsible for organising a response to concerns/allegations that an adult who works with children may have caused harm or could cause harm. They will be informed within one working day of any allegations and advice will be given to employers such as the Headteacher or Chair of Governors to ensure any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively. The LADO can be contacted by telephone: 0208 547 5008 / 07774 332 675

Email: Referral and Contact Officer

LADO@achievingforchildren.org.uk

The LADO online referral form:

<https://docs.google.com/forms/d/e/1FAIpQLSdYVca4qbvFJS71sD2PzY8mhyot9GrOdzsHUUYOmJeM7uCKA/viewform>

(For allegations against staff contact the SPA who can also refer you to the LADO)

Kingston and Richmond Safeguarding Children Partnership (KRSCP)

07834 386459

Kingston and Richmond Safeguarding Children Partnership

c/o London Borough of Richmond upon Thames, 44 York Street, (Ground Floor), Twickenham, TW1 3BZ

lscb-support@kingrichlscb.org.uk

Kingston Prevent: *(For concerns regarding extremism and/or radicalisation)*

Prevent Lead in Kingston: Stephanie Royston-Mitchell – Community Safety and Resilience Principal Anti-Terrorism Hotline: 0800 789 321

DfE's Counter-Extremism Helpline for non-emergency advice for staff and governors

0207 340 7264

counter-extremism@education.gov.uk

Call 999 if you suspect immediate danger. Call 101 to speak to your local police in a non-emergency.

Prevent lead in Kingston: Stephanie Royston-Mitchell, Community Safety and Resilience Principal
stephanie.royston-mitchell@kingston.gov.uk

prevent@kingston.gov.uk

Members of the general public can report any concerns they have about someone that is at risk of being drawn into terrorism or violent extremism at actearly.uk/ and by calling 0800 011 3764. Referrals can also be made to the Single Point of Access (see above).

Police (emergency): 999

(Non-emergency): 101

Kingston Police - Dedicated Ward Officer

PC Simon Bennett

Simon.Bennett@met.police.uk

FGM reporting – nonemergency contact number: 101



The NSPCC/Home Office Child Abuse Whistleblowing Helpline:

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

KRSCP Early Help Resilience Networks

Dasha Kuzina

07795 494 705

Reporting serious wrongdoing to the Charity Commission

Guidance: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

Email: whistleblowing@charitycommission.gsi.gov.uk



THE FOLLOWING TELEPHONE NUMBERS MAY BE USEFUL FOR STUDENTS:

Kingston Single Point of Access (SPA): *(For safeguarding concerns about students)*

0208 547 5008

Childline

0800 1111

NSPCC

0808 800 5000

or submit concern via the online form:

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/>

Contact number for those who have experienced sexual harassment or abuse in education:

0800 136 663

OFSTED Helpline

0300 123 4666

UK Safer Internet Centre

Professional Online Safety Helpline: 0344 381 4772

helpline@saferinternet.org.uk

Children's Commissioner

0800 528 0731

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

National Domestic Abuse Helpline (Refuge)

0808 2000 247

<http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

Lucy Faithful Shore Foundation: [Home - Shore](#)

Offering anonymous advice to teenagers about concerning sexual behaviour



MARYMOUNT SAFEGUARDING POLICY STATEMENT

This policy has been authorised by the Governors, is addressed to all members of staff and volunteers, and is available to parents on request. It applies wherever staff, temporary staff or volunteers are working with students even where this is away from the School; for example, at an activity centre or on an educational visit. Wherever the word “staff” is used in this document, it covers ALL persons working within the school including employed staff, Governors, Senior Leadership Team, supply and self-employed staff, contractors and volunteers, students or those on work experience. The Board of Governors takes seriously its responsibility to safeguard and promote the welfare of students; safeguarding and child protection underpin all aspects of policy and procedure development. Governors work together with other agencies to ensure adequate systems are in place within the School to identify, assess and support those students who are suffering harm.

The School’s Safeguarding Policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, the Education and Inspections Act 2006, the Education Act 2011, Human Rights Act 1998, Public Sector Equality Duty, and the Equality Act 2010.

In producing this policy regard has been paid to:

Keeping Children Safe in Education (September 2025) (KCSIE)
Generative AI in Education (2025)
Working together to improve school attendance (2024) (DfE)
Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2024)
Gender Questioning Children: Non-statutory guidance for schools and colleges in England (2023 draft consultation)
Working Together to Safeguard Children (2023) (WT)
Teaching online safety in school (Updated 2023)
Meeting Digital and technology Standards in Schools and Colleges (March 2023)
NMS for Boarding Schools (2022)
Searching, Screening and Confiscation Advice for Schools (July 2022)
Behaviour in Schools: Advice for Headteachers and School Staff (September 2022)
Relationships Education, Relationships and Sex Education (RSE) and Health Education (2021 with July 2025 under review)
Coronavirus (COVID-19): safeguarding in schools, colleges and other providers (2020 subject to DfE updates) and Safeguarding and remote education during coronavirus (COVID-19)
When to Call the Police (NPCC)
PACE (Police and Criminal Evidence Act) Code C (2019)
Review of children in need (2019)
Information Sharing (2018)
Mental health and behaviour in schools (November 2018)
Sexual Violence and Sexual Harassment between Children in Schools and Colleges (September 2021)
‘Preventing and Tackling Bullying’ (2017)
What to do if you’re worried a child is being abused (March 2015)
Promoting children and young people’s emotional health and wellbeing (March 2015 and updated in 2021)
Prevent Duty Guidance: for England and Wales (2023)) (Prevent)
The use of social media for on-line radicalization (July 2015)
Counselling in Schools: a blueprint for the future (February 2016)
Counselling in Schools: a blueprint for the future (March 2015)
The Equality Act (2010)
The Education (Independent Schools Standards) Regulations (2014)
Education Act (2002)
The Children Act (1989) and 2004 Amendment
The Human Rights Act (1998) The Public Sector Equality Duty (PSED)



and is in accordance with locally agreed inter-agency procedures set out by Kingston and Richmond Safeguarding Children Partnership. **Kingston procedures and contact details are contained within their website:** <https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/>. This policy is reviewed by the Senior Leadership Team and the Governors at least annually.

Marymount International School London is committed to safeguarding and promoting the welfare of each student under its care and expects all staff and volunteers to share this commitment and understand that the student's welfare/well-being is our paramount concern. The School is committed to providing help and support to meet the needs of students as soon as problems emerge. Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of maltreatment whether that is within or outside of home, including online. Maltreatment includes neglect, non-accidental physical injury, sexual or criminal exploitation, emotional ill-treatment or impairment to mental and physical health or development. The School should provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental and moral development of each individual student to enable all students to reach their potential and ensure they have the best outcomes.

The School strives to provide opportunities for students to talk to a trusted adult should they need someone to listen to any concerns. Those in pastoral roles are encouraged to provide "reachable moments" to enable students to talk and information about who students can contact is posted around the campus and on Microsoft Teams. Worry boxes where students can write down any concern confidentially are located in the Infirmary corridor and Gailhac bathrooms. Boarders also have access to an 'Independent Listener'. Students are also given opportunities to provide feedback through the Advisory system and surveys.

All members of the Board of Governors receive training in safeguarding during their Induction. This is updated on an annual basis to ensure that they are equipped with the knowledge to assure the practices and procedures are effective and robust. Governors should be aware of their obligations under the Human Rights Act (1998), the Equality Act (2010), (including the Public Sector Equality Duty) and their multi-agency safeguarding arrangements. Governors must carefully consider how they are supporting their students with regards to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. At all times the Governing Body and the School will consider the best interests of the student and will have a student-centred and coordinated approach to safeguarding.

The School ensures that all contact details for agency involvement are displayed prominently, including those for support and advice about extremism. All members of the School are required to read and understand the Safeguarding Policy, Part 1 of KCSIE and Annex B of KCSIE (September 2025). Those staff not working directly with children are permitted to read a condensed version of Part 1 as found in Annex A. Staff must also read and abide by the Staff Code of Conduct, Daily requirements as found in the Staff Handbook and the Staff Acceptable Use Policy, and to report instances of actual or suspected child abuse, neglect, exploitation or radicalisation to the Designated Safeguarding Leads. In the case of Female Genital Mutilation (FGM), teachers recognise that they must report to the police cases where they discover that an act of FGM appears to have been carried out. In addition, all staff are familiar with the Prevent Duty Guidance for England and Wales (2023).

Safeguarding is everyone's responsibility, and everyone has a role to play in identifying concerns, sharing information and taking prompt action. In exceptional circumstances all staff may make a referral and report directly to the local authority children's social care; however, staff are expected to raise concerns with the Schools' Designated Safeguarding Lead in the first instance.

Marymount International School recognises the importance of respecting the dignity of each student so that each child can flourish. As an IB school, students are encouraged to become global citizens where all cultures, protected characteristics are respected and behaviours that are intolerant of others are not accepted.

The School recognises that safeguarding incidents could happen anywhere and all staff should be alert to possible concerns being raised in this School. The School will take all reasonable measures to ensure:

- That a Safeguarding Policy and appropriate procedures and training are in place.



- The School's safeguarding policies are up to date, risks are assessed at regular intervals and any areas requiring action are dealt with immediately.
- Arrangements have regard to the National Minimum Standards for Boarding Schools (May 2022).
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families. Safer recruitment is practised in checking the suitability of staff and volunteers (including staff employed by another organisation), and other staff or supply staff which must be completed to work with children and young people in accordance with the principles established by the Children's Act (1989 & 2004), the Education Act (2002) and in line with government publications: Working Together to Safeguard Children (2023), and holds an up to date single central register of staff, ensuring the school meets statutory requirements and advice. (See Recruitment, Selection and Disclosure Policy and Procedure Policy. Relevant staff are trained in safer recruitment procedures.)
- That any external provider of activities taking place on the school campus provides assurance that they have appropriate safeguarding policies and procedures in place, and that they will liaise with the School on such matters. The governing body will ensure safeguarding requirements are included in any lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this will lead to termination of the agreement. Visiting speakers are checked as suitable and supervised.
- That all necessary checks on the suitability of people who serve on the School's governing body in accordance with regulations and guidance as above are carried out¹.
- That Governors ensure that IT filters and monitoring systems are in place and regularly review their effectiveness including ensuring that unreasonable restrictions do not restrict student learning.
- That all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction).
- That where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS) and to the Teaching Regulation Agency (TRA).
- That the local inter-agency procedures of the Kingston and Richmond Safeguarding Children Partnership are followed which includes the School's submission of an annual safeguarding self-audit.
- That each student is protected from all forms of abuse, whether from an adult or another student; we are alert to possible signs of abuse both in the School and from outside.
- That every suspicion or complaint of abuse is dealt with appropriately.
- That procedures that promote this policy are designed and operated.
- Procedures are designed and operated which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.
- Students who have been abused are supported in accordance with their agreed Child Protection Plan.
- That staff are alert to the medical needs of students with medical conditions.
- Safeguarding students who have suffered or are likely to suffer significant harm are differentiated from those who are in need of additional support from one or more agencies. The former are reported to the local authority children's social care, and the latter are referred for an Early Help Assessment (EHA).
- That students are taught about safeguarding in the following ways to prevent risk or harm occurring:
 - The Student Leaders are given safeguarding training by the DSL in the first half- term of the school year.

¹ Guidance regarding CRB/DBS checks recently updated by the Protection of Freedoms Act 2012



- Through the PSHEE and RSE curriculum, students focus on how to develop healthy relationships and friendships. Students consider the nature of boundaries and consent and how to recognise an abusive relationship including coercive and controlling behaviours, laws relating to sexual harassment, sexual violence and exploitation, grooming and domestic abuse. Through the PSHEE and RSE Programmes, students will also learn about so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support.
- Emphasis is given to consider behaviour positively through Kindness Week. During this week, students will identify bullying behaviour and learn that it is unacceptable and what to do if bullying occurs in school or online.
- Students also learn about stereotyping, prejudice and equality and how all students should be treated with dignity and respect in accordance with the Vision of the School, 'that all may have life'. Particular focus is given to the Protected Characteristics throughout the school year through the Advisory curriculum, assemblies and PSHEE so that students have a good understanding of those who are identified through the Equality Act.
- Students will also learn about body confidence and self-esteem through the PSHEE programmes.
- Students are reminded of how to stay safe online and also in school and in their personal lives through the Advisory system and PSHEE curriculum. (Further information about staying safe online can be found in the Staff and Student Acceptable Use Policies and Online Safety Policy). Through these curricula and additional workshops and presentations, students are taught about the four key areas of risk when online:
 - content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
 - contact:** being subjected to harmful online interaction with other users
 - conduct:** personal online behaviour that increases the likelihood of, or causes, harm
 - commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. External speakers are invited to the school on an annual basis to teach online safety to students. Workshops and information about keeping students safe online is provided to parents and staff.
- Appropriate filtering and monitoring systems are in place to protect students when they are online on the school's IT systems or recommended resources.
- Students are reminded of safeguarding issues in assemblies throughout the year. Reminders include: how to stay safe online; how to balance online activity with mental well-being; identifying key staff students can turn to if they are experiencing a problem; anti-bullying through Kindness Week; personal security should there be a crisis.
- Boarders are advised how to stay safe during their boarding induction with emphasis given to staying safe when off campus and communicating back to school in case of emergency.
- Staff follow requirements of the Code of Conduct.
- Robust and sensible Health & Safety procedures are operated.
- All practicable steps are taken to ensure that School premises are as secure as circumstances permit.
- That clear and supportive policies on drugs, alcohol and substance misuse are operated.
- Other external experts are invited in to raise student's awareness on the following concerns:
 - dangers of substance misuse;
 - nature of consent; and
 - how to respond to sexual harassment and abuse and any other concerns that arise during the school year.
- Procedures are considered and developed to deal with any other safeguarding issues which may be specific to individual children in our School and working with agencies such as Child and Adolescent Mental Health Services (CAMHS) and Interpol. Every complaint or suspicion of abuse from within or outside the School will in all circumstances be referred to an external agency such as the Royal Borough of Kingston Single Point of Access Team (SPA), Achieving for Children (AfC), the Child Protection Unit (CPU) of the police or the National Society for the Prevention of Cruelty to Children NSPCC. In cases of allegations against staff, the matter will be referred to the



Local Authority Designated Officer (LADO), Kingston and Richmond Safeguarding Children Partnership, within 24 hours.

- The Safeguarding Governor meets with the DSL, at least three times a year reporting findings back to the Governing Body. The DSL provides a report for Governors for each Board meeting summarising safeguarding issues for that period. The Safeguarding Policy is reviewed annually by the Board of Governors and overseen by the Chair of Governors.



ROLE OF DESIGNATED SAFEGUARDING LEAD AND DEPUTIES

The Designated Safeguarding Lead

The School has appointed a senior member of staff on the Senior Leadership Team with the necessary status and authority (Designated Safeguarding Lead) to take lead responsibility for matters relating to safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). Although the Deputy Safeguarding Leads are trained to the same standard as the Designated Safeguarding Lead, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Lead. (*Please refer to Annex C of KCSIE for more detail*).

The main responsibilities of the Designated Safeguarding Lead are:

- To take lead responsibility for safeguarding and child protection including online safety.
- To be the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection. Promoting supportive engagement with parents and/or guardians in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- To refer cases of suspected abuse to the Kingston and Richmond Safeguarding Children Partnership and other agencies as required, and support staff who also make referrals to local authority children's social care.
- To refer cases to the Channel Programme where there is a concern that a student may be susceptible to radicalization and support staff who make such referrals. (Any referral requires the individual's consent).
- To refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required.
- To refer cases where a crime has been committed to the Police as required (Designated Safeguarding Leads should refer to *NPCC-When to call the police* when considering whether to call the police and to know what to expect when they do).
- To liaise with the Headteacher to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. The DSL and Headmistress should be aware of the requirement for children to have an Appropriate Adult (See PACE Code C 2019 guidance and Searching, Screening and Confiscation Advice for Schools (July 2022)).
- To act as a source of support, advice and expertise for all staff on matters of safety and safeguarding and co-ordinate the safeguarding and child protection procedures in the School.
- To liaise with staff (especially those who offer pastoral provision, the School Nurse, the Life Coach/Counsellor, the IT Manager and the Director of Learning Support, Heads of Year) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- To work with the Headmistress and Deputy Head Academic, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes ensuring knowing which students may have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that there may be a lasting impact on the child's educational outcomes.
- To ensure each staff member has access to, and understands, the School's Safeguarding policy and procedures including new and part-time staff. Ensuring the School's Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governors regarding this.
- To ensure the Safeguarding policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the School in this.
- To link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- To understand the assessment process for early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.



- 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
- To understand the importance of the role the DSL has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- To understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- To be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- To understand the importance of information sharing, within the School and with safeguarding partners and other agencies.
- To understand and support the with regards to the School requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- To understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- To recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- To obtain access to resources and attend any relevant or refresher training courses.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them whilst also understanding that children may have difficulty approaching staff about their circumstances and that trusted relationships help facilitate communication.
- Maintaining an on-going and regular training programme including online safety, and regular updates at least annually for all school employees, which ensures that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, engaging in inappropriate electronic communication with a student, and so on)². Regular training will also be refreshed via Staff briefings, emails, further training for example so that staff are able to keep up to date with developments in this area.

RECORD KEEPING AND SHARING INFORMATION

The DSL will:

- keep clear and comprehensive summary of concerns with details of how the concern was followed up and resolved and a note of any actions taken, decisions reached and the outcome. Rationale for decision making where referrals were or were not made will also be recorded.
- keep child protection separate from student records, until the student's 25th birthday. These should include discussions and decisions made including the rationale for those decisions. These should be copied on to the child's next school as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term. This is transferred separately from the main student file and is sent securely. Confirmation of receipt is obtained to ensure safe delivery of the file. The DSL may also consider it appropriate to share information with the new school or college in advance of that student leaving to ensure continued support when that child arrives at their new school. An indication of the existence of the additional file is marked on student files;
- understand that safeguarding information which is sensitive and personal should be treated as 'special category personal data', according to The Data Protection Act 2018 and GDPR and that this allows schools to share information without consent where there is good reason to do so, and

² *Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings is also available on the DfE website*



that the sharing of information will enhance the safeguarding of a student. It may not be possible to always gain consent and gaining consent may also place a student at risk. If providing information would put a student at risk and the *serious harms test*³ is met, the School can withhold the provision of data. The School is aware that they do not prevent the sharing of information for the purposes of keeping children safe and that GDPR does not override sharing safeguarding concerns with those who need to know although they have a duty to process individual's information fairly and lawfully and hold personal information safe and secure;

- liaise with the Designated Person responsible for Child Protection appointed by the LADO (Local Authority Designated Officer) and the Headmistress who will act as "case manager" in cases which concern a staff member (as per Part 4 of KCSIE).
- keep the Headmistress informed of all actions unless the Headmistress is the subject of a complaint. In this situation, the Designated Person should consult with Ms Cristina Serrano, Chair of Governors;
- Liaise with the Virtual School Head who manages Looked After Children and has strategic oversight of educational attendance, attainment and progress of children with a social worker.
- ensure that any student currently with a child protection plan who is absent from school without explanation for two days is referred to her Social Care Team.
- If the Designated Safeguarding Lead is unavailable or is herself the subject of a complaint, her duties will be carried out by the Deputy Safeguarding Leads, who have received appropriate training which is updated every two years. This will include inter-agency working protocols and training in the Kingston and Richmond Safeguarding Children Partnership's approach to Prevent duties.
- The Designated Person and her Deputies have undertaken Child Protection Training and training in inter-agency working and will attend refresher training biennially.
- The Headmistress ensures that there are sufficient resources, time, funding, and support allocated to allow the Designated Person to fulfil her child welfare and safeguarding responsibilities effectively.

DUTY OF SENIOR LEADERS, EMPLOYEES, GOVERNORS AND VOLUNTEERS

Every employee and Governor of the School as well as every volunteer who assists the School is under a general legal duty:

- to protect children from abuse and be aware that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline;
- to read and understand Part 1 of KCSIE and Annex B (September 2025) or a condensed version of Part 1 Annex A for those staff not working directly with children;
- to be aware of the School's Safeguarding Policy and procedures which should amongst other things also include the policy and procedures to deal with child-on-child abuse;
- to know how to access and implement the procedures, independently if necessary;
- to keep a sufficient record of any significant complaint, conversation or event;
- to be aware of the role of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads;
- to report any matters of concern to the Designated Safeguarding Lead.
- All adults working at Marymount International School (including visiting staff, volunteers and students) may refer directly to Local Authority Children's Social Care should there be a concern that a child is at risk of harm or has been harmed; however, staff are expected to raise concerns with the School's Designated Safeguarding Lead in the first instance;
- to know and understand the Staff Code of Conduct and Acceptable Use Policies⁴ ;

³ The harms test is explained on the Disclosure and Barring service website on GOV.UK. Section 31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002, available at legislation.gov.uk

⁴ Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings is also available on the DfE website



- to be aware of the Missing Persons Procedure and Attendance and Absence Policy;
- to be aware of the student Behaviour, Rewards and Sanctions Policy;
- to be aware of the School's Whistleblowing Policy.

ABSENCE FROM EDUCATION

Students 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 criminal exploitation – particularly county lines. The School responds to supporting children who are persistently absent and also addresses problems with absence when they are emerging, especially if the child is known to children's services or has a social worker allocated to them. (Please refer to the Attendance and Absence policy and the statutory guidance on school attendance: Working together to improve school attendance (2024).

MONITORING AND FILTERING OF DIGITAL AND TECHNOLOGY SYSTEMS

At Marymount International School, Governors, Senior leaders and the Head of Digital Solutions work together to provide a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding students and staff from potentially harmful and inappropriate online material. (See Online Safety Policy for further details).

RESPONSIBILITY AND ALLOCATION OF TASKS

The Board of Governors has overall strategic responsibility for filtering and monitoring. (Further information about these responsibilities can be found in the Online Safety Policy).

SIGNS OF ABUSE

Abuse is a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children from all forms of domestic abuse including where they see, hear, or experience its effects. A child may be abused by an adult(s) or by another child or children, which may be known as 'child-on-child' abuse. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of school. Staff, (especially the Designated Safeguarding Lead and Deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Forms of abuse are:

1. **Physical abuse** - which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. **Emotional abuse** - the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views,



deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3. **Sexual abuse** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, and they may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
4. **Neglect** - the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

It is important that the whole Marymount community understand and are aware of the many different aspects related to Safeguarding. Specific forms of safeguarding issues are defined in *Keeping Children Safe in Education, Annex B* (September 2025) and include knowledge of the following to ensure our students safety:

- **Child abduction and community safety incidents** (Unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child)
- **Children and the court system**
- **Children absent from education** – repeated /prolonged absences can act as a sign of safeguarding concern, including abuse, neglect, sexual abuse or exploitation as well as child criminal exploitation.
- **Children who have experienced multiple suspensions or at risk of being permanently excluded from schools, colleges and alternative provision**
- **Children missing from education** – unexplained and/or persistent absences from education, home or care
- **Children with family members in prison** / custody or is affected by parental offending
- **Child sexual exploitation (CSE) and Child criminal exploitation (CCE)** - (*see below for more detail*)
- **County lines** - a term used to describe gangs and organised criminal networks involved in exporting illegal drugs. Children are exploited to move, store and sell drugs and money.
- **Cybercrime** – criminal activity using computers/internet. Children with particular skills in this area may inadvertently or deliberately stray into cyber-dependent crime. (*Referrals may be made to the ‘Cyber Choices’ programme*).
- **Domestic abuse** defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional; Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse



in their intimate relationships (teenage relationship abuse), which can have a detrimental impact on their health and wellbeing, development and ability to learn. (*Operation Encompass operates in all police forces across England and helps police and schools work together to provide emotional and practical help for children. Additional advice can also be found on NSPCC and Refuge websites: [How to Protect Children From Domestic Abuse | NSPCC](#) ; [What is domestic abuse? - Refuge](#)*)

- **Homelessness**
- So called '**honour-based' abuse** - (HBA - incidents of crimes which have been committed to protect or defend the honour of the family and/or community, including **Female Genital Mutilation (FGM)**, **forced marriage**, and practices such as breast ironing). FGM is a criminal offence, and it is mandatory to report to the police. Forced marriage is one entered into without full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into marriage. It is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used.
- **Modern Slavery** – encompassing human trafficking and slavery, servitude and forced labour.
- **Preventing radicalisation (The Prevent duty) and Channel Programme** – Children may be susceptible to radicalisation into terrorism. Staff are required to complete Prevent Awareness training. (*Further resource: [Educate Against Hate - Prevent Radicalisation & Extremism](#)*)
- **Child on child abuse** (see below)
- **Sexual violence and sexual harassment between children in schools and colleges** (*See below*)
- **Upskirting**
- **Bullying /Cyberbullying** (*See Anti-Bullying Policy*)
- **Substance Misuse**
- **Fabricated or induced illness**
- **Faith based abuse**
- **Serious violence: Gangs and youth violence; Gender-based violence/violence against women and girls (VAWG)**. (Advice is provided in 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines guidance'. Indicators may include absence from school, a decline in school performance, self-harm or change in wellbeing, assault or unexplained injuries, unexplained gifts)
- **Mental health problems** (*See below*)
- **Private fostering**
- **Sextortion**

PREVENT DUTY

The School has due regard to the need to prevent people from becoming terrorists or supporting terrorism under section 26 of the Counter-Terrorism and Security Act (2015) and is seen as the School's wider safeguarding obligations. All staff are required to complete Prevent Awareness training in order to familiarise themselves with the Prevent Duty guidance. The School assesses the risk of children being drawn into terrorism and identifies those may be at risk of radicalisation. The DSL will make a Prevent referral according to local authority guidelines if there is a concern or call 999 if there is immediate risk of harm. A referral to the Channel programme will be made if a student is susceptible to being drawn into terrorism. The School is aware that any such referral will require the individual's consent.

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

Staff at Marymount should be aware of both CSE and CCE, which are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance can be due to age, 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 child 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, 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. Exploitation can be physical and/or take place online. It is important to



note that girls are at risk of criminal exploitation (although the experience may be different to boys) and that all children at risk of being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of both child criminal and sexual exploitation where students:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Some indicators of CSE (as well as those listed for CCE) include:

- students having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- displaying sexual behaviours beyond expected sexual development;
- becoming pregnant.

Abuse by one or more students against another student (child on child abuse)

At Marymount International School London, we expect all members of our community to treat each other kindly and with respect. Procedures to minimise the risk of child-on-child abuse are in place through the PSHEE and Advisory Curricula, and also through pastoral care that is offered throughout the School. Students are encouraged to disclose if they have been a victim of child-on-child abuse or are aware of someone being targeted by their peers. Students can speak to the Designated Safeguarding Leads in the School or any trusted adult who they feel comfortable talking to or can call Childline or the NSPCC contact number for those who have experienced sexual harassment or abuse in education: 0800 136 663. Students can email, use the Teams Chat function, or the worry boxes in Gailhac Hall / Infirmary corridor if they wish to disclose any abuse. The Counsellor and Independent Listener are also available should students require further support. There is recognition that girls are often the victims of child-on-child abuse and that abuse could still be occurring even if there are no disclosures.

There is a zero-tolerance approach to any type of abuse and child-on-child abuse will be thoroughly investigated. It can include bullying, (including cyberbullying, prejudiced-based and discriminatory bullying), physical abuse, sexual violence and harassment, abuse in intimate personal relationships between peers, sexting and initiation/hazing type violence and rituals. A student being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a student who is perceived by other students to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as students who are.

Staff should be aware that there may be additional barriers when recognising abuse and neglect for those students who have special educational needs and/or disabilities (SEND). The barriers may include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's condition without further exploration. They may also be more vulnerable to peer group isolation or bullying (including prejudiced-based bullying) than other students and so disproportionately impacted by behaviours such as bullying, without outwardly showing signs or communicating and reporting these challenges.

Child-on-child abuse may also include consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. Although consensual image sharing (especially between older children) might not be abusive - students will still be made aware that it is illegal - whilst non-consensual is illegal and abusive⁵.

⁵ UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>



Child-on-child abuse may also include 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. It may also include upskirting, which is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

The DfE September 2021 report entitled, '[Sexual violence and sexual harassment between children in schools and colleges](#)' includes advice about what is meant by sexual violence and sexual harassment and advice on a whole school approach to preventing this. (Further information can be accessed through the above hyperlink.) Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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

- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable and will not be tolerated. It is important that all victims are taken seriously and offered appropriate support. The perpetrator will also be offered support throughout the investigation as well as any other children who are affected.

All staff should be clear that they must report any concern with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a student may be at risk from it. Victims and alleged perpetrators of child-on-child abuse will be fully supported through the pastoral care system and by the Designated Safeguarding Lead and relevant Advisor. The Life Coach/Counsellor may also be involved as an additional support. If child on child abuse is not being reported, it could still be happening. Staff need to be vigilant to harmful behaviours and report any concerns to the DSLs.

In the event that:

The allegation or event is one of actual bodily harm – i.e. an injury has necessitated first aid or medical treatment.

- The allegation has been reported to the Police or Children's Services by the student or parent.
- The student is looked after in public care.
- The student is the subject of a Child Protection Plan.
- The student has a disability or Statement of Special Educational Needs.
- The student concerned has been subject to previous complaints.
- The allegation is one of sexual abuse, sexual violence, sexual harassment.

The parents of the victim and the perpetrators(s) will immediately be informed, by the DSL or the Head, of the action or allegation if the child is not deemed to be at risk upon this disclosure to parents.

Advice will be sought from the Kingston SPA (or appropriate social worker if allocated) with a view to a Strategy Meeting or Discussion being held within 24 hours. This process will ensure there is an agreed appropriate course of action and the time- scale for investigations.

In considering whether or not a referral to Children's Services is appropriate, the Headmistress may seek advice from the either of the Chair of Governors and the LA's Lead Officer and advisers. Parents should also be advised of their independent right to make a formal complaint to the Police.



A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. The Anti-Bullying Policy and procedures are available as a separate policy on the school website or on request from the School Office.

Child-on-child abuse will not be passed off as 'banter' or 'part of growing up,' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Consideration is given to the fact that students with SEN/D may be more vulnerable to bullying.

Allegations of any form of bullying or child-on-child abuse involving mobile phones and/or social media including consensual or non-consensual sharing of nudes or semi-nudes images or videos will be thoroughly investigated and dealt with in line with the anti-bullying, acceptable use and behaviour policies, and the DSL will seek the advice of and liaise with relevant agencies. Advice about sexting in schools is available from the [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(Dec 2020\)](#). The School will ensure monitoring and filtering is in place for those who use the school network so that any inappropriate material is identified and fully investigated.

MENTAL HEALTH

At Marymount, we seek to ensure the students receive a holistic education where they are cared for intellectually, physically, emotionally, mentally and spiritually in a safe and calm environment. Through the pastoral care system and because of the low student-teacher ratio, mental health and emotional issues can be identified swiftly. The PE, PSHEE and Advisory curricula, provide resources to help students understand how to adopt positive strategies for their overall well-being in order to develop their emotional resilience and physical health. (See Health and Wellbeing Policy for further detail on support available to students and staff). Although staff are not in a position to make a diagnosis for any mental health issues, they should inform the Mental Health Lead/ DSL if they feel a student is suffering from a mental health problem or is at risk of suffering from one, which could become or has become a safeguarding concern. In some cases, such problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The DSL, as Senior Mental Health Lead, will liaise with external agencies and work with families to ensure that a student has the appropriate support for a mental health issue they may be experiencing. In the case of students who may be questioning their gender, the School will take a cautious approach and consider the broad range of their individual needs, in partnership with the student's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the student), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Further resources to support staff can be found in the DfE Guidance: [Mental health and behaviour in schools \(publishing.service.gov.uk\)](#) and [Gender Questioning Children - non-statutory guidance \(education.gov.uk\)](#). Possible signs of abuse include (but are not limited to):

- the student says she has been abused or asks a question which gives rise to that inference;
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour;
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- the student's development is delayed;
- the student loses or gains weight;
- the student appears neglected, e.g. dirty, hungry, inadequately clothed;
- the student has difficulties integrating in the school community;
- the student display signs of over-sexualisation;
- the student is in possession of pornographic material;
- the student is reluctant to go home, or has been openly rejected by her parents or carers.
- increased absence from school;
- change in friendships or relationships with older individuals or groups;
- significant decline in academic performance;
- signs of self-harm or significant change in well-being;
- the student experiences mental health issues;
- signs of assault or unexplained injuries;



- unexplained gifts of new possessions could also indicate that children have been approached by or involved with criminal networks or gangs.

TRAINING

Whole-School in-service training on safeguarding issues, including the Prevent Duty, will be undertaken annually, in line with advice from the Kingston and Richmond Safeguarding Children Partnership. Staff will receive training on how to recognise signs of abuse including child-on-child sexual violence or sexual harassment. All staff, including the Head and any volunteers, are expected to attend relevant training. Informal updates are given by the DSLs either by email or in minuted Staff Briefings as required, for instance by changes in regulations or best practice, and at least annually. All staff are trained in online safety through School CPD. Useful resources for online safety to inform governors, staff, parents and students can be found in Annex B of KCSIE (2025) and are shared with staff via SharePoint / CPD, with parents via newsletters and guest speakers, and with students through the Advisor and PSHEE curricula as well as through other subject areas. All staff are provided with information to help inform their understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring systems in the school.

All staff read Part One of KCSIE (2025) and Annex B. This applies not only to new staff but also to those already in post in April 2014 when KCSIE was first introduced. Special provision is available to staff who struggle with English and literacy and those that are not working directly with children, are permitted to read Part 1 in Annex A.

- The DSL and Deputy DSLs receive updated Child Protection Training at least every two years. This will include local inter-agency working protocols and training in the Kingston and Richmond Safeguarding Children Partnership's approach to Prevent duties.
- The DSL and Deputy DSLs will also refresh their knowledge and skills by keeping abreast of latest safeguarding news/developments.
- All new staff, including temporary staff and volunteers, are provided with Induction Training that includes:
 - The School's Safeguarding Policy
 - The Staff Code of Conduct/Behaviour Policy including Whistleblowing Policy
 - The Behaviour, Rewards and Sanctions Policy
 - Health and Wellbeing Policy
 - Missing Persons Procedure and Attendance and Absence Policy
 - The identity and role of the Designated Safeguarding Lead and Deputies
 - A copy of Part 1 of KCSIE 2025 and Annex B

The Governing body takes a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors. Everyone receives the same training at the start of the year and a link to KCSIE in other languages is also shared at this time (<https://national.lgfl.net/digisafe/kcsie/kcsietranslate>)

Additional one-to-one training from the DSLs or their deputies will be given if necessary to ensure full understanding of these. New staff will be made aware of the identity and role of the DSL and deputy DSLs, the Whistleblowing Policy, and the Acceptable Use of Technologies Policy, and be given copies of the relevant documents.

DSLs will be expected to attend appropriate network meetings and to participate in the multi-agency training programme organized by the Kingston and Richmond Safeguarding Children Partnership.

All staff as part of their Induction will be required to read and understand the policies listed above including the Anti-Bullying Policy. Staff must sign a confirmation form to state that they have read and understood these policies. Existing staff are updated appropriately. A register of training undertaken will be kept by the HR Officer and DSL.

PROCEDURES

Staff are given training in order to know how to deal with a safeguarding disclosure made by staff or student. They are also given training to know how to deal with an incident that includes sexual harassment or violence. All victims will be taken seriously, kept safe and will never be made to feel like they are creating a problem for reporting any form of abuse and/or neglect, sexual violence or sexual harassment.



Initial complaint:

A member of staff suspecting or hearing a complaint/ disclosure of abuse must take immediate action. They should recognize that a student is likely to disclose to someone they trust and should be supportive and respectful. All staff should be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful or may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not stop staff having professional curiosity and speaking to the DSL if they have concerns about a student.

- They must listen carefully to the student and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- They must not ask leading questions, that is, a question which suggests its own answer and only prompting the student where necessary with open questions – where, when, what, etc.
- They must reassure the student but not give a guarantee of absolute confidentiality. The member of staff should explain that s/he needs to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken. It is important that the victim understands what the next steps will be and who the report will be passed to.
- They must keep a brief but sufficient written record of the conversation. Wait until the end of the report and immediately write up a thorough summary. This will allow the staff member to devote their full attention to the child and listen to what they are saying. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The written report should only record facts as the child has presented them and not the personal judgements of the note taker. The record should be signed by the person making it and should use names, not initials. They should not make copies of the record. The record must be kept securely and handed to the Designated Safeguarding Lead. The record will detail how the concern was followed up and any actions taken including the outcome.
- The School should not do anything that may jeopardise a police investigation, such as asking a student a leading question or attempting to investigate the allegations of abuse.
- Where the report includes an online element, staff should not view or forward illegal images of a student. The advice as found in 'Searching, Screening and Confiscation' and UKCIS Sharing Nudes and Semi-Nudes Advice provides more detail on what to do in this instance.
- The School will follow the flow chart of actions where there are concerns about a student to be found in KCSIE (September 2025). The DSL and other staff may be required to support other agencies and professionals following a referral. If information is not forthcoming after a referral the DSL or the member of staff who made the referral should follow this up with the agency to whom the referral was made. If the School continues to believe a referral meets the threshold for further action but it has not been escalated by Children's services, they may follow the Local Authority's 'Escalation Procedure'.
- Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It can be more effective in promoting the welfare of children than reacting later and can be used to address non-violent 'Harmful Sexual Behaviour' and may prevent escalation of sexual violence. If an early help assessment is appropriate, the DSL or deputy DSL will lead on working together with the other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. The DSL and/or Deputy DSL may (with consent from the child or family, or anonymously) discuss what is happening with the Early Help Resilience Network to ensure all identified needs are supported by the appropriate agencies. If support is required, this will be kept under review and a referral to children's services may be required if there is no improvement to the child's situation. If a student is suffering or is likely to suffer from harm or abuse and/or neglect and/or complex family circumstances, a referral to the appropriate safeguarding partner (and police if appropriate) will be made immediately. The School will be aware that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. If after a referral there is no improvement in the situation the DSL (or the person who made the referral) should press for re-consideration to ensure the student's situation improves. Although parental permission may be sought should a referral be made, it is not



necessary that such consent is given in order for the School to make a referral to the relevant safeguarding partner.

- All staff should be prepared to identify students who may benefit from early help, and should discuss early help requirements with the DSL. Staff should be particularly alert to the potential need for early help for a student who may have special educational needs, a disability or mental health needs, students who may be young carers, frequently missing, at risk of radicalisation or exploitation, at risk of FGM, or maybe privately fostered, as well as other potential safeguarding concerns listed in KCSIE (para.18). The advice from DFE entitled *What to do if you are worried a child is being abused* and the NSPCC website provide more advice and information. The School may decide that a student may not require a referral to statutory services but may benefit from early help to help prevent further escalation. The DSL will coordinate early help support with the Kingston and Richmond Safeguarding Children Partnership. The DSL must also be aware and apply a contextual approach to safeguarding. Incidents and/or behaviours can be associated with factors outside the School and/or can occur between students outside the School. All staff, but especially the Designated Safeguarding Lead (or deputy) should consider the context within which such incidents and/or behaviours occur. Assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare. Providing as much information at the time of referral will allow any assessment to consider all the available evidence and the full context of any abuse.

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

- The victim (their protection and support), their wishes in terms of how they want to proceed
- The alleged perpetrator (and their support)
- All the other students (and adult students and staff) and actions to protect them.
- The nature of the alleged incident (s)
- The ages of the students involved and their developmental stages
- Understanding intra familial harms and any necessary support for siblings following incidents.
- Any power imbalance between the students (e.g. Age, maturity, confidence, disability)
- Is the incident a one-off or a pattern of abuse?
- Are there ongoing risks?
- The time and location of the incident, and any action required to make the location safer.

Risk assessments will be recorded and kept under review to ensure that measures are put in place to protect students and keep them safe.

Whilst the incident is being investigated, the School will consider how best to keep the 'victim' and 'perpetrator' a reasonable distance apart whilst at school or taking transport to and from school, where appropriate. The School will refer to Hackett's Continuum when managing reports of Harmful Sexual Behaviours such as sexual violence and/or sexual harassment. These actions will be in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator.

Every report will be managed on a case-by-case basis and support will be tailored to each student involved. Sexual assault can result in a range of health needs and the DSL will work with the students to ensure appropriate support is in place. The school will consider the four following options when managing reports of sexual violence and/or sexual harassment (or Harmful Sexual Behaviours):

1. Inappropriate: Manage the report internally.
2. Problematic: The students may benefit from Early Help from external agencies.
3. Abusive: When a student has been harmed or is likely to be harmed, the incident will be referred to the Kingston and Richmond Safeguarding Children Partnership.
4. Violent: Any sexual behaviour that would involve a referral to the Police and Kingston and Richmond Safeguarding Children Partnership e.g. sexual assault.

The DSL will work with Kingston and Richmond Safeguarding Children Partnership and specialist services as required. Incidents will be monitored and reviewed by the DSL to ensure patterns of behaviour are identified and whether further training for staff is required to minimise risks.

At Marymount International School London, we ensure that any form of abuse or harmful behavior is dealt with immediately and consistently to reduce the extent of harm to the student, with full consideration to the impact



on that student's emotional and mental health and well-being. The victim must always feel reassured when making the disclosure and feel that they are valued and respected in accordance with the ethos of the School and that they are being taken seriously. A student who has disclosed abusive or any harmful/problematic sexual behaviour will never be made to feel ashamed for making a report. It should be explained that the law is in place to protect students rather than criminalise them to avoid further distress. Careful handling of the situation should ensure future victims of sexual violence and sexual harassment feel confident to report or come forward. Where it is known that a student has a social worker, the School will ensure that any unauthorized absences or safeguarding concerns will be communicated. Pastoral support will be offered to that student to ensure they are cared for and their needs are met, as fully as possible, in order to help that student flourish. Should a report prove to be unsubstantiated, malicious or false, the DSL will consider why the person making the allegation has made the claim and whether further support is required. Should the report be deliberately malicious, the School will follow the Behaviour, Rewards and Sanctions and/or Acceptable Use policies.

Preserving evidence:

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved not fewer than six years and at least until the student has reached the age of 25.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS:

Marymount will consider and investigate all allegations against staff quickly, fairly and consistently and in accordance with Kingston and Richmond Safeguarding Children Partnership Practices and KCSIE (2025) and Working Together to Safeguard Children (2023). Staff should feel comfortable to come forward to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. In training, Staff are asked to 'think the unthinkable' in order to maintain a vigilant culture in the School to help deter and prevent abuse or risk of harm.

Should the School receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (e.g. summer camp, community groups, sports associations, or service providers that run extra-curricular activities), the School will follow their safeguarding policies and procedures, including informing the LADO.

Although supply staff and contractors may not be directly employed by the School, Marymount will report any allegation about supply staff to the LADO to ensure children are kept safe. Marymount will keep the agency/employment business fully informed and involved.

If the Headmistress is absent, the allegation should be passed on to the Chair of Governors. If an allegation concerns the Headmistress, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Headmistress first. In cases of serious harm, the police should be informed from the outset. The reporting staff member is provided with immunity from retribution or disciplinary action for 'whistleblowing' in good faith [see Whistleblowing Policy and Procedures in Staff Handbook]. If a member of boarding staff is suspended in light of a child protection allegations, arrangements will be made for alternative accommodation away from children.

Effective protection for the child and support for the person subject to the allegation will be provided. Allegations that are considered 'low level concerns' will be responded to differently to those where the allegation meets the harms threshold⁶.

1. Allegations against staff that may meet the harms threshold

The guidance above will be followed where it is alleged that a member of staff has:

⁶ The harm test is explained on the Disclosure and Barring service website on GOV.UK. Section 31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002



- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (This is if there is a transferrable risk if a member of staff has been involved in an incident outside of school that may entail that students could be at risk).

- Where a child has been harmed or is at risk of harm, the DSL will ensure that the child is not at risk and refer the case of suspected abuse to the relevant Children's Services and police in the case of emergency.

- The Headmistress (Case Manager) will oversee the investigation and support the person subject to the allegation. They will discuss with the LADO, the nature, content and context of the allegation within 24 hours of the allegation being made and agree a course of action.

Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Advice about when the staff member who is the subject of the allegation will be informed will be considered carefully following advice from the LADO.

Where the Headmistress is concerned about the welfare of other students in the community or the member of staff's family, the DSL will make a risk assessment of the situation. If necessary, a referral to Children's Services will be made.

Where the initial discussion with the LADO leads to **no further action**, the Headmistress and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned and by whom.

Where **further enquiries** are required to enable a decision about how to proceed, the LADO and Headmistress will discuss how and by whom the investigation will be undertaken. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, local authority children's social care, the School or a combination of these. Within the School, the investigation will be undertaken by the DSL or other senior member of staff. An independent investigator will be provided if the allegation requires it or is particularly complex. The Headmistress will ensure that the progress of the case is monitored and dealt with as quickly as possible in a thorough and fair process. It will be reviewed fortnightly or at monthly intervals. The first review will take place within four weeks after the initial assessment. The Headmistress will keep the LADO informed of the investigation.

Suspension should not be an automatic response when an allegation is reported. The Headmistress must consider carefully whether the circumstances warrant suspension from contact with students where there is cause to suspect student(s) may be at risk of harm or where the case is so serious there is grounds for dismissal, or until the allegation is resolved. If in doubt, the Headmistress should seek advice from the LADO and HR, as well as the police and Children's Services where they have been involved.

Where the School is made aware that the Secretary of State has made an interim prohibition order, in respect of a member of staff, immediate action will be taken to ensure the staff member does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the staff member must not carry out teaching or work in boarding.

In many cases, an inquiry can be resolved quickly and without the need for suspension. Based on advice from HR and/or a risk analysis drawn up with the LADO, other alternatives should be considered by the Headmistress before suspending a member of staff. The Headmistress should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false. If immediate suspension is considered necessary, the Headmistress should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.



Where it has been deemed appropriate to suspend the staff member, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. The School will ensure a named contact and their contact details will be provided in order to support the member of staff involved.

The welfare of the student (s) is paramount whilst the investigations are ongoing. However, it is recognised that being the subject of an investigation can be very stressful for the member of staff involved and their family. Information will be treated confidentially and not shared with those not directly involved in the investigation.

The School's duty of care to their employees entails that:

- the stress caused by the allegation will be managed and minimised;
- that the staff member will be informed as soon as possible with explanations given about the course of action (as guided by the LADO or police if necessary);
- the staff member will be advised to contact their trade union representative or a colleague for support;
- the School will appoint a named representative to keep the staff member involved informed of progress of the case;
- provide access to counselling or medical advice where appropriate;
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the student(s) involved will be:

- formally told about the allegation as soon as possible (what information can be disclosed will depend on consultation with Children's services and/or the police if they are involved)
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member;
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against staff members whilst investigations are in progress as set out in section 141F of the Education Act 2002.

Marymount will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Legislation (Education Act 2011) prevents the "publication" of material by any person that may lead to the identification of the teacher who is the subject of the allegation. Parents will be made aware of these restrictions when being informed of an investigation that may involve their daughter.

Allegation outcomes will depend on the nature of the allegation and the evidence available. This will range from taking no further action, to dismissal or a decision not to use the staff member's services in future.

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the allegation is substantiated, the School will report to the Disclosure and Barring Service (DBS) and to the Teaching Regulation Agency (TRA) within one month of leaving the School any person in regulated activity (whether employed, contracted, a volunteer or student) whose services are no longer used because s/he is considered unsuitable to work with children; the address to make a DBS Referral online is <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>. The School also has a legal duty to respond to requests from the DBS and the TRA for information already held about any person (whether employed, contracted, a volunteer or student).

Where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated the Head and DSL, and if they have been involved, the LADO should consider the facts and determine whether any lessons can be learned and if improvements can be made.



Serious incidents that include suspicions, allegations or incidents of abuse involving students will also be reported to the Charity Commission: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>.

Records concerning allegations of abuse will be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if the student or person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Services may be appropriate. The School recognises that false allegations can cause serious harm to innocent persons. If an allegation results in a finding that the complainant knowingly and falsely accused another person of harassment and/or bullying or inappropriate behaviour, the complainant will be subject to disciplinary action, up to and including permanent exclusion.

Allegations against students: A student or students against whom an allegation of abuse has been made may be suspended from the School during the investigation, and the School's policy on Behaviour, Reward and Sanctions together with the Anti-bullying and Acceptable Use of Technology policies will apply. If the School determines that the latter have been violated in either the real or virtual world, the violator will be subject to appropriate disciplinary action, which may include referral to appropriate counselling, temporary or permanent exclusion. All students involved, whether perpetrator or victim, are treated as being "at risk".

Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a student, should be reported to the LADO. The LADO will coordinate with Children's Services and the police.

For all allegations that are not malicious or false, an accurate record will be kept by the School. Substantiated allegations will be included in references written by the School. Following any investigations regarding allegations involving a member of staff, the Headmistress will consider the facts and determine if improvements can be made.

2. Allegations against staff that do not meet the harms threshold

The purpose of reporting 'low-level' concerns is to create and embed a culture of openness, trust and transparency in which the School's values and expected code of conduct are lived, monitored and reinforced constantly by staff.

Staff are encouraged to disclose any low-level concern that they may have to the DSL. It is important to share concerns in order to minimise the risk of abuse and enable the School to identify inappropriate, problematic or concerning behaviour early, and ensure that staff working in or on behalf of the School are clear about their professional boundaries and act within these boundaries in accordance with the ethos and values of the School. If the DSL is unavailable, staff should meet with the Headmistress. The DSL will inform the Headmistress of all low-level concerns in a timely fashion. The Headmistress will make the final decision in respect to all low-level concerns. If the low-level concern is raised about the DSL, the concern should be shared with the Headmistress. Staff are expected to know and understand the Staff Code of Conduct which should be consistently adhered to and reinforced by all staff. Staff members are encouraged to self-refer to the DSL if they believe their behaviour could be misinterpreted or, upon reflection, their behaviour has fallen below the Staff Code of Conduct.

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of 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.



Examples of low-level concerns are being over friendly with a student, having favourites, taking photographs of a student on their mobile phone, engaging with a student on a one-to-one basis in a secluded area or behind a closed door or humiliating a student. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Staff are encouraged to feel confident to self-refer where they have found themselves in a situation that could be considered a low-level concern.

The DSL or Headmistress will consult with the LADO if it is unclear if the allegation is a low-level concern or meets the harms threshold. Any low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that potential patterns of inappropriate behaviour can be identified. If the concern has been raised via a third party, the Headmistress (of nominated Deputy) will collect as much evidence as possible by speaking directly to the person who raised the concern, (unless it has been raised anonymously), and to the individual involved and any witnesses. This will help them to categorise the type of behaviour and determine any further action that may need to be taken. This information will be recorded with a rationale for decisions and actions taken.

The DSL will hold all records of concerns confidentially and securely. Should the person sharing the concern wish to remain anonymous, this will be respected as far as reasonably possible. Patterns of behaviour will be reviewed to identify harmful behaviour and the School will refer to the Disciplinary Policy to decide the best course of action. Consideration will be given on whether there are wider cultural issues within the school, that enable the behaviour to occur and where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again. Should the pattern of behaviour meet the harms threshold, the School will also refer the concern to the LADO.

MISSING PERSONS:

There is a Missing Persons Procedure, known to staff and used in practice, for searching for and, if necessary reporting, any boarder or day student missing from school (and recording any incident, the action taken and the reasons given by the student for being missing). The Attendance and Absence Policy also explains procedures the School will take should a student be missing from School without authorization.

MONITORING:

The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and make a report to the Headmistress before every Board of Governors' meeting. Monitoring will take place three times a year. The SCR is monitored by the SLT termly and by Governors annually. The Safeguarding Log is reviewed to detail the number of cases involving students and staff that have been addressed by the Designated Safeguarding Lead and Deputies and a report on this is submitted by the Headmistress to the Board Chair tri-annually. The Board Chair ensures the child protection files are maintained as set out in Annex C of KCSIE (2025). An annual audit of the School's safeguarding procedures and practices is completed by the DSL and Headteacher and is submitted to the Kingston and Richmond Safeguarding Children Partnership. Governors undertake an annual review of Safeguarding Procedures and of this policy at the November Board meeting, and how their duties under it have been discharged. They also consider how the students are safeguarded via the curriculum. The Chair of Governors responsible for Safeguarding is Ms Cristina Serrano.



OTHER POLICIES AND PROCEDURES RELATED TO SAFEGUARDING:

(Policies and procedures not on the website can be found in the Student/Parent and Staff Handbooks)

Academic Honesty Policy
Acceptable Use Policy (Staff and Student)
Admissions Policy
Anti-Bullying Policy
Attendance and Absence Policy
Complaints Procedure
Staff Code of Conduct
Drugs Policy
Health and Safety Policy
Health and Wellbeing Policy
Intimacy and Relationship Policy
Missing Persons Procedure
Online Safety Policy
PSHEE Curriculum
RSE Policy and Curriculum
Recruitment, Selection & Disclosure Policy & Procedure
SENDA Policy
Short Term Hosting Guidance
Staff Code of Conduct (plus Daily requirements for staff)
Policy on Use of Reasonable Force
Whistleblowing Policy for Staff
Whistleblowing Policy for Students

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