

Immanuel Safeguarding Procedures

Contents

Introduction	3
A. General definitions and specific safeguarding issues.....	3
B. Early Help.....	6
C. Statutory Definitions of Abuse.....	6
D. How to recognise signs of Abuse.....	12
E. The role of the Designated Safeguarding Leads	19
F. How to deal with concerns, disclosures, the structure of accountability and responsibility	20
G. Guidance for staff regarding how to avoid harming pupils or.....	24
putting themselves at risk of allegations	
H. Search, Screen & Confiscate	25
I. Safer Recruitment.....	26
J. Concerns about and allegations against staff	26
K. Termination of Employment	28
L. Allegations against pupils – child on child abuse	28
M. Use of Mobile phones and cameras in EYFS.....	31
N. E-Safety.....	31
O. Procedures for Mental Health Issues	32
P. Anti-bullying procedures	32
Q. Special Educational Needs (SEN).....	37
R. Guidelines re physical contact.....	37
S. Guidelines for discipline in clubs including physical	399
intervention.....	
T. Membership of Immanuel.....	40
U. Attendance Register	41
V. Keeping records.....	411
W. Supervision ratios	42
X. Parents staying with children’s groups.....	43
Y. Suggestions and complaints from parents/carers.....	43

Z. Home visits.....	44
Z0. Peer-group activities	44
Z1. Off-site events	46
Z2. First aid	47
Z3. Transport	47
Z4. Training.....	47
Z5. Photography and filming	48
Z6. Gifts, rewards and favouritism	48
Z7. Children left at School Procedure	488
Z8. Prayer ministry procedures	49
Z9. Visitors	49
Z10. Key Contact Numbers	49
Appendix A: Flow Chart for Raising Safeguarding Concerns About a Child.	50
Appendix B: Common Sites of Accidental Injury	51
Appendix C: Confidential Report Form	52
Appendix D: Immanuel Model General Information and Consent Form (Church).....	53
Appendix E: Immanuel General Information and Consent Form (School)	55
Appendix F: Tick list for Sleepovers	57
Appendix G: Immanuel School Low Level Concerns Procedure	58
Appendix H - Police and Criminal Evidence Act – Code C	63

Introduction

To be read in conjunction with the Immanuel Safeguarding Policy Statement, the Immanuel Safeguarding Policy, the Immanuel School e-Safety Policy, the Immanuel Mental Health Policy, the Immanuel RSHE policy and the Immanuel Employment Policy and Procedures.

Immanuel recognises that safeguarding is everyone's responsibility and as stated in Working Together to Safeguard Children (Updated June 2025) Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

More succinctly, the aim of child protection and safeguarding is therefore to ensure that children are *safe, healthy, cared for* and *achieve* and, as we are exhorted to love one another (Mark 12), we seek to create a culture that fosters trusting relationships between staff and children.

Our Local Authority and safeguarding contact is Havering and Immanuel operates safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners. Immanuel receives regular updates from the Local Safeguarding Network and attends meetings. However, as pupils come from a wider area, safeguarding contact details are held for Redbridge, Barking & Dagenham, Waltham Forest, Thurrock and Essex. These are at the end of the Immanuel Safeguarding Policy, with copies on the wall in the School Office.

A. General definitions and specific safeguarding issues

Under the Children Act 1989 **abuse** is defined in terms of **a child suffering, or being at risk of suffering 'significant harm', where harm means 'ill-treatment or the impairment of health or development'**.

Abuse can also be defined as 'a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing 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. They may be abused by an adult or another child or children.'

The following definitions of abuse operate in England based on the government guidance 'Keeping Children Safe in Education – statutory guidance for schools and colleges' (updated September 2025). Immanuel recognises that those with SEND may be particularly vulnerable.

Expert and professional organisations are best placed to provide up to date guidance and practical support on specific safeguarding issues. These organisations include:

- Local Authorities
- Thirtyone:eight
- NSPCC

However, When the decision is made to contact the police, the Police and Criminal Evidence Act (1984 – updated Dec 2023) – Code C (PACE) will be adhered to – see Appendix H.

A list of safeguarding issues is below. Immanuel staff complete at least six online safeguarding related training modules annually. Where possible, the local risk of these has been assessed against the latest data provided by **Havering**.

- **Child Sexual Exploitation (CSE)** – *Low risk – 4 incidents reported.*
- **Bullying including cyber bullying** – *Filtering & Monitoring system is excellent at Immanuel, yet pupils have felt comfortable bringing issues to staff from outside school.*
- **Domestic abuse or violence, including coercive control** – *115 cases reported locally. Immanuel has had contact with local children's services in the last two years.*
- **Drugs** – *Havering reports that drug related offences are lower than the London average. None reported at Immanuel.*
- **Fabricated or induced illness** – *no suspected issues reported at Immanuel.*
- **Faith abuse** – *Relatively low number of faith related crimes reported in Havering.*
- **FGM** – *Low risk in Havering. No local prosecutions. Low risk within cultures at school.*
- **Breast Ironing** – *Low risk within the cultures at school.*
- **Children Absent from Education (CAE) or missing from home or care** – *Good attendance at Immanuel School.*
- **Children deliberately missing education (now persistent or unexplained absence)** – *Good attendance at Immanuel School.*
- **Forced marriage** – *Low risk within the cultures at Immanuel School.*

- **Gangs and youth violence** – Havering reports a disproportionate number of young people involved from Black African/ Caribbean ethnicity and is working to address this. No issues reported at Immanuel.
- **Gender based violence/violence against women and girls (VAWG)** – No issues reported at Immanuel.
- **Honour Based Violence** – relatively low risk in Havering. No issues reported at Immanuel.
- **Hate** – 513 incidents reported in Havering – although low compared to London averages.
- **Mental health** – Good services in Havering. 4 Low risk issues monitored at Immanuel.
- **Private fostering** – Currently N/A at Immanuel.
- **Radicalisation** – Low risk locally. All staff familiar with The Prevent Duty.
- **Sexting (now known as Sharing nudes/ semi-nudes)**
- **Teenage relationship abuse** – No incidents reported at Immanuel, although Havering has a relatively high teenage pregnancy rate – probably due to the relatively high number of under 20s.
- **Child on child Abuse** – Low risk at Immanuel, with a strong emphasis on building good relationships. Any reports of bullying quickly investigated and addressed.
- **Trafficking, Modern slavery and the National Referral Mechanism** – Romford Town Centre is the 8th highest London ward for offences. No issues reported at Immanuel.
- **Children and the Court System (children now require two age appropriate guides if attending court to give evidence or otherwise – KCSIE September 2025)** – Although some recent history of parents involved with the court system, no pupils have had to attend.
- **Children with family members in prison** – No issues reported at Immanuel.
- **Child Criminal Exploitation (CCE - commonly known as County Lines)** – Relatively low risk in the borough.
- **Sexual violence, harassment between children and Upskirting**
- – Low risk at Immanuel. Small cohort facilitates open conversations and importance of good relationships.
- **Homelessness** – None at Immanuel.
- **Cybercrime** – Low risk at Immanuel – see eSafety Policy.
- **Child abduction and community safety incidents** – Low risk locally. Havering has set up the Community Safety Partnership, which addresses local issues that arise.
- **Serious violence – including knife crime** – Havering reports they are one of the safest boroughs.
- **Contextual Safeguarding (an approach to understanding, and responding to children's experiences of significant harm beyond their family and home)** – Covered by online training modules at Immanuel.
- **Artificial Intelligence** – Immanuel recognises there are potential risks with A.I and more information is contained in the Immanuel e-Safety Policy.

Immanuel operates a zero-tolerance approach to abuse and it will never be passed off as 'just banter' or 'just having a laugh' or 'part of growing up' or 'boys being boys',

as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

For further information, refer to London Safeguarding Children Procedures 7th Edition (amended March 2025) and KCSIE (September 2025).

B. Early Help

We recognise that any child may benefit from early help, but, as stated in KCSIE (September 2025), we will be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has Special Educational Needs (whether or not they have a statutory Education Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child.
- Has had multiple suspensions or is at risk of permanent exclusion

Detailed information on early help can be found in Chapter 1 of Working Together to Safeguard Children. More information on statutory assessments is included at paragraph 48. Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children.

C. Statutory Definitions of Abuse

The following definition of abuse is laid down in 'No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse (Department of Health 2000 – updated January 2015)': 'Abuse is a violation of an individual's human and civil rights by any other person or persons. In giving substance to that statement, however, consideration needs to be given to a number of factors: abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.'

- i. **Physical abuse:** this is the infliction of pain or physical injury, which is either caused deliberately, or through lack of care.

- ii. **Psychological or emotional abuse:** these are acts or behaviour, which cause mental distress or anguish or negates someone's wishes. It is also behaviour that has a harmful effect on someone's emotional health and development or any other form of mental cruelty.
- iii. **Financial or material abuse:** this is the inappropriate use, misappropriation, embezzlement or theft of money, property or possessions.
- iv. **Neglect or act of omission:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- v. **Discriminatory abuse:** this is the inappropriate treatment of a person because of their age, gender, race, religion, cultural background, sexuality, disability etc. Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. Discriminatory abuse links to all other forms of abuse.
- vi. **Institutional abuse:** this is the mistreatment or abuse of a person by a regime or individuals within an institution (e.g. hospital or care home) or in the community. It can be through repeated acts of poor or inadequate care and neglect or poor professional practice.
- vii. **Spiritual abuse:** there is always a danger of spiritual authority being used to intimidate, manipulate, dominate and/or control.
- viii. **Sexual abuse:** generally, this is the involvement in sexual activities to which the person has not consented or does not truly comprehend and so cannot give informed consent, or where the other party is in a position of trust, power or authority and uses this to override or overcome lack of consent. Sexual abuse can also take place wholly online, or be used to facilitate online abuse. Immanuel also recognises the dangers of child on child sexual abuse.
- ix. Immanuel operates a zero tolerance approach to sexual violence and harassment.

For guidance on how to manage a report of sexual abuse, follow the procedures in Section F. More terms and specific issues are detailed below:

Sexual violence

Sexual offences under the Sexual Offences Act 2003

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.
- **Consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.
 - a child under the age of 13 can never consent to any sexual activity
 - the age of consent is 16
 - sexual intercourse without consent is rape

Sexual harassment

'Unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. It is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It can include:

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

Harmful sexual behaviour

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. We use the term “harmful sexual behaviour” (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two. The ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma.

Preventing abuse

Our school knows what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred, staff know that they can take any concerns to the DSL. The DSL knows what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and is confident in accessing this support.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

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

Children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. 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.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds

who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant

D. How to recognise the signs of abuse

The recognition of abuse can be very difficult. Sometimes suspicions are no more than vague feelings of unease. Noticeable injuries or changes in behaviour patterns may be the result of a number of things, among them abuse. However, it can be very difficult to decide, if, for example, a bruise is caused by accident or as a result of abuse. Very often recognition of abuse emerges from the building up of an accurate picture of the child and family over a period of time. The following guidelines may prove useful in helping to rationalise your concerns regarding possible abuse. Immanuel recognises that the impact of witnessing abuse can be harmful and may require careful action and support as appropriate (KCSIE 2025).

i. Physical abuse

The following signs may be indicators of physical abuse:

- The single or repeated appearance of treated or untreated cuts, bruises and other minor injuries and/or fractures.
- Bruises caused by shaking or squeezing which will often take the form of finger and thumb marks.
- Scalds, burns, bites, swellings and bald patches on the scalp. Regular scald marks, particularly on hands, feet or buttocks, are unlikely to have been caused by accidental splashing. When looking at burn marks, consider the possibility of cigarette burns, which are rarely caused accidentally.
- Bruises caused by biting may appear as oval and open-ended. The size of a bite may indicate whether it has been caused by an adult or another child.
- Hair pulling may cause bald patches.

ii. Sexual abuse

Recognition of sexual abuse can be more difficult than that of physical abuse as there may not be any physical signs at all or, if there are, they may only be observed when the child undresses. Particular attention should be paid to children who appear reluctant to change for a Physical Education

activity. This may indicate either physical or sexual abuse. It may however be nothing more than shyness and so one needs to be careful. Sexual abuse is more likely to be discovered by means of a disclosure - either deliberate, accidental or through a third party.

Indications of sexual abuse are more likely to be emotional or behavioural.

The following signs may be indicators of sexual abuse:

- Torn, stained or bloody underclothes.
- Pain or itching of genital area, including abnormal discharge.
- Injuries such as bruises, scratch and bite marks in the genital or anal area.
- Recurrent urinary tract infections.
- Psychosomatic disorders, such as recurrent abdominal pains.
- Difficulty in walking or sitting.
- Any unexplained changes in behaviour, taking into account the age and previous knowledge of the child. For example, a normally quiet child becoming loud and aggressive, or a boisterous child suddenly becoming quiet and passive.
- Sexually explicit talk and behaviour, inappropriate to the child's age.
- Uncharacteristic eating disorders.
- A disturbance of sleeping patterns, constant tiredness.

Children and young people have always been curious about the opposite sex and/or experimented sexually. However, where a child is in a position of power, has responsibility over another child (as in a babysitting arrangement) and abuses that trust through engaging in sexual activity, this is likely to be regarded as abusive. The same applies where one child introduces another child to age-inappropriate sexual activity or forces themselves onto a child. This is not mutual exploration. Such situations should be taken as seriously as if an adult were involved.

The DSL will follow the DfE Guidance: Sexual violence and sexual harassment between children in schools and colleges 2021/Part Five of Keeping Children Safe in Education 2025: Child-on-child sexual violence and sexual harassment, with consideration of:

- Managing internally
- Early Help
- MASH referral
- Reporting to the police. A MASH referral would always be made when there is a report to police.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of

growing up

- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia; pulling down trousers, flicking bras and lifting up skirts; upskirting.
- Dismissing or tolerating such behaviours risks normalising them and can lead to a culture of unacceptable behaviours and an unsafe environment for children.

iii. Sexting (AKA ‘sharing’ or ‘trading nudes’ and ‘semi nudes’, or youth produced sexual imagery)

The term ‘sexting’ relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often ‘shared’ via social networking sites and instant messaging services. According to a 2021 report released by the Internet Watch Foundation, there has been a 374% increase in self-generated child sexual abuse content since 2019.

Immanuel will not tolerate sexting; it is both unacceptable and illegal and can have extremely damaging and long-lasting consequences. The misuse of electronic communication, such as sexting, inappropriate comments on social media, being the object of cyber-bullying and online grooming are all potential safeguarding concerns. We understand that not all incidents are as a result of grooming by a perpetrator, and that some incidents are initiated by the child, as a demonstration of body confidence, body positivity, or maybe as part of an age appropriate relationship. We have a responsibility to work with parents and carers in ensuring that all children, young people and vulnerable adults are fully aware of the dangers and possible repercussions of sharing nude images and videos.

iv. Emotional abuse

Emotional abuse is probably the most difficult type of abuse to recognise. The signs are behavioural rather than physical, though the manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The following signs may be indicators of emotional abuse:

- Low self-esteem and lack of confidence. Such a child may seek constant reassurance.
- The child may be a ‘loner’ and have poor or no social relationships.
- Other children may use the child as a ‘scapegoat’.

- The child may be withdrawn, introverted and depressed.

v. Neglect

The following signs may be indicators of neglect:

- The signs and symptoms of physical neglect are generally self-evident. Children suffering from neglect can be obviously smelly, poorly or inappropriately dressed, or appear to be constantly cold or hungry.
- A child who fails to achieve his/her normal developmental stages may also be suffering from physical neglect.

vi. Visual abuse

The following signs may be indicators of visual abuse:

- Can often be recognised through the content of conversation, artwork and play.
- Fear and depression.

vii. Female Genital Mutilation (FGM)

If there is a suspicion that a girl is at risk of FGM or that FGM may have taken place this must be reported immediately as with any other form of child abuse.

- The Safeguarding Lead and Local Authority Advisor must be informed
- A referral must be completed to children's social care.
- Where there is a risk to life or likelihood of serious immediate harm, the police should be contacted on 999.
- In other cases, the police must be contacted directly on 101 explaining that you are making a report under the FGM mandatory reporting duty.
- It is essential that the young person's parents are not spoken to before a referral is sent to children's social care. A full risk assessment will be conducted and any decision to contact the young person's parents will be made jointly by children's social care and police.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM

- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM:

The World Health Organisation identify girls between 4 and 10 as being the most at risk.

- FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.
- Indications that FGM may have already taken place may include:
- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

viii. **Breast Ironing**

This is where young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. The custom uses large stones, a hammer or spatulas that have been heated over scorching coals to compress the breast tissue, or an elastic belt to press the breasts so as to prevent them from growing in girls as young as 9 years old. Much like Female Genital Mutilation (FGM), breast-ironing has been identified by the UN as one of five under-reported crimes relating to female-to-female/gender-based violence.

The practice is performed usually by mothers and female relatives and it is believed that by carrying out this act:

- young girls will be protected from harassment, rape, abduction
- it will prevent early pregnancy that would tarnish the family name
- it will allow the girl to pursue education rather than be forced into early marriage (legal age of marriage is 18)
- it will delay pregnancy by “removing” signs of puberty
- girls may not appear sexually attractive to men

Most at risk: Young pubescent girls usually aged between 9 – 15 years old. It is a well-kept secret between the young girl and her female relatives who are likely to carry out the practice.

ix. **Prevent, Radicalisation and Extremism**

Immanuel recognises that children are vulnerable to extremist ideology and radicalisation. Therefore, protecting children and adults from this risk is part of our safeguarding approach and staff do Prevent Duty training (last updated March 2024), on an annual basis, with newly appointed staff doing this within their first term.

According to KCSIE September 2025, the definition for Radicalisation and Extremism is under review. However:

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Immanuel assesses the risk of children and vulnerable adults who may be at risk of radicalisation or extremism. Early indicators may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives,

programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

x. Children Absent from Education (CAE) (Immanuel School specific).

A child absent from education is a potential indicator of abuse, neglect or exploitation. Staff will follow the school's procedures for unauthorised absence and for dealing with these children, particularly on repeat occasions. We will report any children who either join or leave the school at non-standard transition times to the Local Authority - KCSIE (September 2025). CAE may be an indicator of possible abuse and neglect, including sexual exploitation. It may also be a sign of Child Criminal Exploitation (County Lines). Immanuel School will maintain records of two emergency contacts per child, where possible.

xi. Child Criminal Exploitation (CCE) (County Lines)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/ committing serious violence to others. Indicators for involvement in CCE include children who:

- Go missing and are subsequently found in areas away from home.
- Have been victims or perpetrators of serious violence.
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques for concealing drugs, such as 'plugging'.
- Are found in accommodation they have no connection with, often called a 'trap house or cuckooing' or hotel rooms where there is drug activity.
- Owe a 'debt bond'
- Have their bank accounts used to facilitate drug dealing.

xii. Serious violence

Indicators may include increased absence from school, a change of friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. There may also be unexplained gifts or new possessions that could indicate children have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

A. Private Fostering:

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

- A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
- Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.
- Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse, neglect and exploitation or be involved in trafficking, child sexual exploitation or modern-day slavery.
- Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.
- On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

E. The role of the Designated Safeguarding Leads

The roles of both the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead are in line with Annex C of Keeping Children Safe in

Education (September 2025). This is detailed in section E of the Safeguarding Policy, and since September 2023 now includes oversight of filtering & monitoring systems and processes (known at Immanuel as FAM).

F. How to deal with concerns, disclosures, the structure of accountability and responsibility

Safeguarding is **everyone's responsibility**. Where there is either evidence of, or suspicion that there is a child in need, any form of abuse, neglect, exploitation, radicalisation or extremism, the DSL or DDSL must be informed. If for any reason they cannot be contacted, all safeguarding contact details are easily available on the wall in the School Office.

Immanuel operates a zero tolerance approach to sexual violence and harassment.

They will be ready to involve outside agencies, such as Children's Services, the police, or Channel as appropriate and continue to liaise with them, until the matter is officially closed. Records will be kept of any contact with these agencies and children/ young people or vulnerable adult will have opportunities to be listened to.

Whenever a statutory person (police, Children's Services, Channel) initially call requesting information about a pupil, it is the responsibility of the person taking the call to check their identity by taking their name and switchboard number, calling this number and requesting to be patched through.

Parental or pupil consent is not required for a referral to a statutory agency regarding concerns over child safety. Specific procedural details are outlined below.

Immanuel recognises that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children – see KCSIE (September 2025).

Immanuel has a strong tradition of pastoral care and oversight, so where concerns do not reach the thresholds for abuse, early help will be given by the responsible adult carrying oversight for the particular child, young person or vulnerable adult. This may be through timely interventions such as:

- Informal conversations in a social setting, where children/ young people or vulnerable adult will have opportunities to be listened to.
- Scheduled pastoral sessions
- Arranged meeting with parent/carers

- Referrals to counsellor or support group
- (School specific) Pastoral session with form tutor and/or Phase leader.

As mentioned above recognition of abuse can be very difficult and sometimes suspicions are no more than vague feelings of unease based on something observed or sensed. And what can appear like abuse can be altogether innocent. It's important therefore not to quickly jump to conclusions whilst at the same time not ignoring concerns. Unless there are obvious signs of abuse or a direct disclosure is made however (see below) it's best to allow a picture to develop over a period of time before coming to a decision. In this way it is more likely to be the right decision. The reverse side of the Confidential Report Form (see Appendix C) can be used to record feelings/concerns.

Information suggesting that abuse may have occurred can come from a variety of sources. It may have resulted from a direct disclosure on the part of a child, young person or vulnerable adult, a change in their behaviour, a concern raised by a relative, friend or others within Immanuel or a picture built up over a period of time as mentioned above.

If there is a concern that a child, young person or vulnerable adult may have been abused or a direct allegation of abuse has been made, it's important the person receiving this information follows the guidelines below. **If the disclosure is of a sexual nature, then two staff members should be present where possible:**

- i. The initial discussion is important and the following advice will hopefully help:
 - When a person wants to talk about abuse:
 - Listen carefully to what they say.
 - Keep calm.
 - Look the person in the eye.
 - Let the person know you will need to tell someone - do not promise confidentiality.
 - Even when the person has broken a rule, communicate that he/she is not to blame for the abuse.
 - Be aware that the person may have been threatened or sworn to secrecy.
 - Never push for information.
 - Helpful things to say:
 - I'm glad you have told me.
 - It's not your fault.
 - I will help you.
 - Is there anything else you wish to tell me?
 - The pace should be dictated by the child so do not ask any leading questions. Avoid saying:

- Why didn't you tell anyone before?
 - I cannot believe it.
 - Are you sure this is true?
 - Why? How? When? Who? Where?
 - False promises.
 - Things like 'I am shocked'.
- Concluding the discussion:
 - Reassure the person it was right to tell you and that you will do everything you can to help.
 - Let the person know what you are going to do next and that you will let him/her know what happens.
- ii. Make notes as soon as possible (preferably within one hour of the person talking) including a description of any injury, its size, and a drawing of its location and shape on the persons' body. Note its position to see if it has occurred at one of the common sites of non-accidental injury.
- see Appendix B.
 - iii. Write down exactly what has been said, when she/he said it, what was said in reply and what was happening immediately beforehand (e.g. a description of an activity). Only record facts as the child presents them. Note the explanation given for its cause on the Confidential Report Form - see Appendix C.
 - iv. Write down dates and times of these events and when the record was made. Write down any action taken and keep all hand written notes even if subsequently typed up.
 - v. These notes should be passed to the one of the Designated Safeguarding Leads – Ben Cope (Immanuel Leader) - or Sarah Williams (Principal, Immanuel School) who has specific responsibility for Safeguarding in EYFS. Always keep in mind that your role is to clarify the facts not to investigate the complaint.
 - vi. Where a person is believed to have suffered harm, or may be at risk of suffering harm of any kind, the Safeguarding Leads should refer the matter to the relevant agency – Children's Social Care/ Police - **within 24 hours**.

However, if either the DSL or DDSL are unavailable, staff should use the contact details on the wall in the School Office to contact the relevant agency, themselves, **as anybody can make a referral. Should this happen, the DSL or DDSL should be informed as soon as reasonably possible.**

- vii. The Designated Safeguarding Leads should immediately inform the Immanuel Leadership Team, Safeguarding Trustee (Lin Milton) and the Chair of Trustees.
- viii. All documents should be signed, dated and kept for an indefinite period in a secure place. Consideration should be given to any procedures that have already been adopted by Immanuel and it's important that the conditions laid down by Immanuel's insurers are followed to ensure there is appropriate cover against any claims. Full details of advice given and action taken by other agencies must be recorded – including dates when it was advised any cases should be signed off.
- ix. If an allegation is against a member of staff, see **section I**, for details.
- x. If the Designated Safeguarding Leads are not contactable or they are subject of the concerns, the Immanuel Leadership Team, Safeguarding Trustee or Chair of Trustees should be contacted. If they are the subject of the concerns, the statutory agencies should be contacted directly.
- xi. If a child/young person/vulnerable adult needs urgent medical attention an ambulance should be called or they should be taken to hospital, informing the parents/carers afterwards of the action that was taken. The hospital staff should be informed of any safeguarding concerns. They have a responsibility to pass these concerns on to the statutory authorities.
- xii. If it is deemed that a child is in need of support, perhaps due to poor parenting, but not at risk of abuse, it may be appropriate to speak to the parent/carer, offer practical domestic help and suggest, for example, a chat with the health visitor, doctor or Children's Social Services.
- xiii. Procedures need to be applied with common sense and professional judgement.
- xiv. Where the disclosure is of a **sexual nature**, there are specific guidelines listed below.
 - Where possible, two staff members should be present.
 - If illegal images of a child are involved, these should not be deleted, viewed or forwarded (unless this was unavoidable, in which case detailed records should be kept concerning this).
 - It is important that the victim understands next steps and who the report will be passed to.
 - It is important that the person receiving the disclosure recognises that they have been placed in a position of trust and that they should be supportive and respectful of the child.
 - Parents or carers should normally be informed unless this would put the victim at greater risk.

- A report of rape, assault by penetration and sexual assaults are crimes. These should be reported to the police.
- Ultimately, the DSL/ DDSL will have to balance the victim's wishes against their duty to protect the victim and other children. Appropriate support should be offered if the disclosure is reported to the police and/ or children's social care, handling the case sensitively.
- Immanuel will do all that it reasonably can to protect the anonymity of any children involved and consider the potential impact of social media.
- A risk and needs assessment will be produced – following guidelines in KCSIE 2025.
- In sexual harassment cases – especially one off incidents – Immanuel may take the view that statutory services are not required and choose to manage the incident internally via behaviour policy and pastoral care. It may also be decided to utilise Early Help.
- If a report is determined to be unsubstantiated, false, unfounded, or malicious, the DSL/ DDSL will consider whether the person making the allegation is in need of help in any way. Disciplinary action may be appropriate.

G. Guidance for staff regarding how to avoid harming pupils or putting themselves at risk of allegations

- All staff should maintain high standards of ethics and behaviour; treat pupils with respect and dignity and have regard for the need to safeguard pupils' well-being.
- All staff should be aware of both the school's code of conduct for pupils and the school discipline procedures and these should be used as the backdrop to creating a safe and secure environment.
- Good classroom management should limit poor behaviour; so staff need to be armed with a variety of simple strategies that defuse tension at a very early stage, e.g. separating mischievous pupils.
- In the vast majority of instances, discipline will take place within a working environment with other pupils present. Where this is not the case however and the member of staff needs to address a pupil individually, it is recommended that both staff and pupils sit behind their respective desks and that the classroom door is kept open. In the case of younger pupils they may sit on the carpet. Staff may choose to have another member of staff present at this moment if that feels more comfortable.
- Should a member of staff, or a pupil, reach a point where they are becoming unduly agitated, another member of staff must be drawn in

immediately. This can be done by sending another pupil for help and an additional member of staff coming into the classroom, or by the pupil who is misbehaving being sent to another room to calm down.

- If a situation arises where a pupil is becoming routinely badly behaved, the class teacher should speak to the Principal or a member of the School Leadership Team who will help them to establish a discipline management plan, which is in line with the school's discipline policy and procedure.
- Minor discipline infringements should be recorded in the form folder and issues of greater significance should be reported to the Principal or the Safeguarding Lead as appropriate.
- At least one member of staff is to be trained in Physical Restraint.

H. Search, Screen & Confiscate

In accordance with Health and Safety legislation, the school is committed to minimising risks to pupils by ensuring a safe learning environment. Searching and screening are part of our safeguarding measures, as they allow staff to identify and remove prohibited items from the school premises.

Screening procedures will never involve physical contact with pupils. However, searches may include pupils' personal belongings such as bags and lockers.

All staff members have the authority to conduct a search when there are reasonable grounds to suspect that a pupil is in possession of a prohibited item. Searches must be authorised by the Principal, and wherever possible, two members of staff should be present during both the search and the confiscation of any prohibited items. Where a safeguarding concern arises, the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) must also be present.

Before any search takes place, staff should request the pupil's consent (verbal consent is sufficient). If consent is provided, staff may search for any item. If consent is refused, staff may only search for items listed as prohibited under statutory guidance (see below).

Prohibited items:

- Knives or weapons
- Alcohol
- Pornographic images
- Illegal drugs
- Stolen items
- Fireworks
- Tobacco or cigarette papers

- Vapes
- Any article that the member of staff suspects has been or is likely to be used to commit an offence or to cause personal injury, or to damage the property of any person.
- Any item banned by the school rules.

Items banned by Immanuel School

- Aerosol cans
- Smart watches
- Mobile phones whilst pupils on site (they need to be handed in)

I. Safer Recruitment

We practice safe recruitment by undertaking DBS checks of staff and volunteers who work with children/young people/vulnerable adults - see Immanuel Employment Policy and Procedures. The Designated Safeguarding Lead, Deputy and Leader of Immanuel have received Safer Recruitment Training by either the London Borough of Havering, the NSPCC, the Independent Schools' Association (ISA) and also online training provided by TES Develop.

Following the UK leaving the EU, Immanuel recognises that the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states and will follow advice as outlined in KCSIE (September 2025). We will make further checks as appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

- criminal records checks for overseas applicants – Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional bod applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC.

J. Concerns about and allegations against staff

At Immanuel, we recognise the possibility that adults working in the church or the school may harm children. Any concerns about the conduct of **any adults** in the school should be taken to **Sarah Williams (Immanuel School Principal and Deputy DSL)**, without delay. This includes members of school staff and any other adults on site, such as volunteers, parents, visiting speakers and contractors. If they meet the harm threshold, these concerns will be reported to the LADO. Where there has been serious harm, or someone is in immediate danger, the police will be informed. The school will not internally investigate until instructed by the LADO.

Meeting the harm threshold includes if an adult has:

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

Where the allegation is against the Principal, or there is any conflict of interest in reporting a matter to the Principal, the Principal must not be informed of the allegation prior to contact with Peter Taylor (Immanuel Leader), the Safeguarding Trustee, the Chair of Trustees and the LADO. On receipt of an allegation, the aforementioned people will discuss immediately, on the same working day, the content of the allegation with Local Authority Designated Officer (LADO), before taking any further action. The school will not internally investigate until instructed by the LADO.

- Local Authority procedures for managing allegations against staff will be followed. This includes the reporting of such allegations to the DBS and the Teaching Regulation Agency (TRA). These procedures are contained in the London Child Protection Procedures (7th edition, updated March 2025).
- All staff are aware that if, for whatever reason, none of the options explained above are available to them, they have a duty to contact the LADO, in order to do what is commonly known as 'whistle blowing'.
- If the allegation is against any adult not associated or involved with the school, but rather the church, the person receiving the allegation should immediately inform Ben Cope (Designated Safeguarding Lead), or Peter Taylor (Immanuel Leader), without delay. Should the concern be about both of them, Lin Milton (Safeguarding Trustee) and Steve Milton, Chair of Trustees, should be informed.
- Advice should be sought from the statutory authorities before taking any action such as suspension of employment. Refer to Working Together to Safeguard Children (updated June 2025) and the document 'Dealing with allegations of abuse against teachers and other staff' – Keeping Children Safe in Education (September 2025). This defines an allegation as:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates that they are unsuitable to work with children.

The suspension of a worker following an allegation is by definition a neutral act but may be necessary because the priority is to protect children, young people and vulnerable adults from possible further abuse or from being influenced in any way by the alleged perpetrator.

The Immanuel Leadership Team, in discussion with the Trustees, will report to the Department for Education and Charity Commission all appropriate cases where a member of staff:

- I. Is dismissed.
 - II. Resigns after being accused of misconduct.
 - III. Resigns before enquiries into alleged misconduct are completed.
 - IV. Resigns on the award of retirement benefits.
- Immanuel does not employ supply staff, but should any contractor display any such behaviour, their employers will be informed.

K. Termination of Employment

If it is deemed necessary to terminate a person's employment, due to them having caused harm or posing a risk of harm to a child:

- Immanuel is committed to report promptly to the DBS, whether the termination of a person's services is due to dismissal, non-renewal of a fixed term contract, no longer using a volunteer or no longer using contracted staff for after school activities. When required, a thorough report will be made and forwarded to the DBS, as Immanuel is aware that not to do so constitutes an offence.
- Immanuel will consider making a referral to the Teaching Regulation Agency (TRA), whether following dismissal, or resignation in anticipation of dismissal, if it is considered that a prohibition order may be appropriate for reasons such as 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. We will not come to any 'Compromise agreements' which may prevent a referral being made to the DBS. For advice about whether an allegation against a member of staff is sufficiently serious to refer to the TRA, we would refer to the guidance, 'Teacher misconduct: the prohibition of Teachers' (April 2018). We are aware that there is also further guidance on the TRA website.

L. Allegations against pupils – child on child abuse

- KCSIE (September 2025) states that child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. (This may include an online element that facilitates, threatens and/ or encourages physical abuse).
 - Sexual violence, such as rape, assault by penetration and sexual assault. (This also may include an online element that facilitates, threatens and/ or encourages physical abuse).
 - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
 - Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
 - Sexting (consensual and non-consensual sharing of nudes and semi-nude images and/ or videos – also known as youth produced sexual imagery).
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
 - Initiation/hazing type violence and rituals, which may also have an online element.
 - Abuse in intimate personal relationships between peers.
- The school recognises the different forms child on child abuse and is clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. All staff should be clear as to the school’s policy and procedures with regards to child on child abuse – challenging all abusive behaviours and reporting any concerns to the DSL or DDSL. This will ensure that issues are addressed quickly and will also assist with setting context for anything that may happen, in future.
 - Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.
 - Professionals should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.

- Professionals should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.
- The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or Sexual Abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or at risk of suffering, Significant Harm and in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.
- If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:
 - There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
 - The perpetrator has repeatedly tried to harm one or more other children; or
 - There are concerns about the intention of the alleged perpetrator.
- If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.
- Immanuel recognises that it is more likely that girls will be victims and boys perpetrators, but all child on child abuse is unacceptable and will be taken seriously.
- Different types of child on child abuse may include: sexual violence and sexual harassment, including 'upskirting' (see KCSIE); physical abuse; Sexting; initiation/hazing-type violence and rituals.
- Child on child abuse on the basis of protected characteristics (listed below) is taken seriously.
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation

- **Immanuel London's approach to child on child abuse:**
 - Staff and Children's/Youth Leaders Training
 - School pupils to be informed through the curriculum, form time and assemblies about:
 - The identity of the DSL and DDSL, which are on posters around the school.
 - How CCTV is there to help protect them
 - Using the 'Bully Box' (labelled on site as 'The Worry Box')
 - Allegations are recorded, investigated and dealt with in line with Immanuel's Safeguarding Policy and Procedures – section F, informing external agencies, where necessary.
 - Support of victims, perpetrators and others affected is given by the DSL, DDSL, senior staff and children's and youth leaders.
 - Immanuel also recognises that, even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported. All staff remain vigilant, challenge attitudes and behaviour and note down details of any behaviour, no matter how seemingly trivial, which are stored in the **Pupil Concerns** folder, stored in the Principal's office.

M. Use of Mobile phones and cameras in EYFS

Staff are permitted to bring their mobile phones into the classroom, but they must remain on silent or be switched off and stored securely. They may only be used on a designated break. Mobile phones, cameras and other electronic devices belonging to staff/volunteers/parents may not be used to take photographs or videos of children at any time.

Photographs taken for EYFS profiles may only be taken using the designated Immanuel School camera. These photographs are stored on an encrypted hard drive.

In the eSafety policy, there is additional guidance on the use of mobile phones and cameras in other school age groups.

N. E-Safety (and Filtering & Monitoring)

Immanuel endeavours to ensure the e-safety of all members of the school and church community. We believe it is important to recognise both the benefits and dangers of technology, seeking to use it wisely and in a way that honours

God. We also recognise that, although the DSL has responsibility for understanding the filtering & monitoring systems and processes in place - as per KCSIE (Updated September 2025 - ALL staff have an understanding of the expectations, applicable roles and responsibilities in relation to this.

Immanuel has purchased new filtering software, from a specialist company called *Smoothwall*, which monitors Internet use and filters inappropriate and potentially dangerous content, while ensuring necessary online content and resources are available to support the curriculum. Designated staff – Alex Agrenich, Ben Cope and the Principal – Sarah Williams will monitor activity utilising the reports generated by *Smoothwall*. Along with staff vigilance, this has strengthened the school's ability to monitor online activity. Issues will be investigated and acted upon as appropriate.

The Immanuel e-Safety Policy contains specific details on the use of mobile technology and Artificial Intelligence (AI).

O. Procedures for Mental Health Issues

At Immanuel, we are committed to supporting the mental health and wellbeing of our children and young people, recognising that it is everybody's responsibility. We encourage openness, want all to know that they are heard, respect that everyone experiences life challenges and difficulties and that they may need help to cope and overcome these at times. Immanuel promotes a culture that is supportive, caring and encouraging. In addition, if staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken. Full details about our approach to mental health are outlined in the **Immanuel Mental Health Policy**.

P. Anti-bullying procedures

Immanuel has a zero tolerance towards bullying. When there is reasonable cause to suspect a child, young person or vulnerable adult is suffering or is likely to suffer significant harm, a bullying incident will be treated as a child protection concern.

Children can bully each other, be bullied by adults, sometimes bully adults and adults can bully other adults. Any form of bullying results in pain and distress to the victim and is unacceptable behaviour within Immanuel. Some common forms of bullying are:

- i. The use of aggression with the intention of hurting another person; repeated often over a period of time.

- ii. Treating with persistent petty cruelty - often difficult for victims to defend themselves against.
- iii. To use threats and taunts, to intimidate and or coerce.
- iv. Bullying can involve an element of spiritual control.
- v. Verbal - name-calling, sarcasm, spreading nasty stories (rumours) about someone, teasing including via emails or text messaging.
- vi. Emotional - being unfriendly, excluding, tormenting, graffiti, gestures, racial taunts.
- vii. Physical - pushing, kicking, hitting, taking belongings, punching or any use of violence.
- viii. Sexual - sexually abusive comments or gestures.
- ix. Racial - any of the above because of, or focusing on the issue of racial differences.
- x. Homophobic - any of the above because of, or focusing on the issue of sexual orientation.
- xi. Unofficial activities such as initiation ceremonies and practical jokes which may cause the victim physical or emotional harm even though this may not be intended.

Signs of bullying are varied but can include:

- i. Victims being reluctant to attend school/club and often absent.
- ii. Victims being more anxious and insecure than others, having fewer friends and often feeling unhappy and lonely.
- iii. Victims suffering from low self-esteem and negative self-image, looking upon themselves as failures - feeling stupid, ashamed and unattractive.
- iv. Victims presenting a variety of symptoms, including fits, faints, vomiting, limb pains, paralysis, hyperventilation, visual symptoms, headaches, stomach aches, bed wetting, sleeping difficulties and sadness.
- v. Depression or, in the most serious cases, attempted suicide.
- vi. Anxiety, loneliness and lack of trust in adult life.

Prevention and intervention methods should be implemented:

- i. Movement in corridors, changing rooms etc. should be structured in such a way as to limit opportunities for bullying.
- ii. Develop a playground strategy in Immanuel School (similar strategies can be developed for clubs):
 - L. Playground strategies should set out clear guidelines for managing pupil behaviour during breaks and lunchtimes. Involve all staff, especially lunchtime supervisors, as well as pupils.
 - LI. Effective supervision involves moving around the grounds, talking briefly with pupils and anticipating potential difficulties. A suspected problem should be quietly and promptly investigated.
 - LII. There needs to be efficient communication between supervisors and those responsible for co-ordinating the behaviour policy - and clear definition of roles and responsibilities of supervisors and teachers when on duty.
 - LIII. Supervisors' authority is not always acknowledged, undermining efforts to manage behaviour. They need to operate rewards and sanctions, refer an incident for further action if necessary, and know about follow-up. Teaching staff should fully support them in exercising authority.
 - LIV. Knowing who has persistently been bullied or is bullying can increase vigilance, but avoid labelling individuals with terms like 'bully' or 'trouble-maker' since this could lead to incorrect interpretation of incidents or a self-fulfilling prophecy.
- iii. Teaching on a regular basis in assemblies, PSHE/Focus lessons and clubs should not only challenge behaviour, but also inspire participants to look out for each other.
- iv. Help everyone to understand what methods of communication and support are available to them.
- v. Pray regularly for a spirit of discernment to see bullying behaviour exposed and dealt with.
- vi. Identify people who are vulnerable to bullying and those who are likely to bully. Some victims may behave passively or submissively, signalling to others that they would not retaliate if attacked or insulted. Others may behave aggressively; sometimes provoking others to retaliate. Some pupils in Immanuel School may find it hard to concentrate in class, are hyperactive, or behave in ways that irritate others. They may get angry easily and fight back when attacked or even slightly provoked - and a large

number of classmates and adults, including the teacher, may dislike them. Teaching into low self-esteem issues should be employed to help those vulnerable to bullying. Any child can be bullied, and although none of these characteristics can excuse it, certain factors can make bullying more likely:

- LV. Lacking close friends in school.
 - LVI. Being shy.
 - LVII. Having an over-protective family environment.
 - LVIII. Being from a different racial or ethnic group to the majority.
 - LIX. Being different in some obvious respect - such as stammering, having Special Educational Needs or a disability.
- vii. Befriending involves assigning selected peer level volunteers to 'be with' or 'befriend' peers. The befriended feel more positive about themselves having had someone to talk to about their problems. Befrienders:
- LX. Need friendly personal qualities.
 - LXI. Give support with emotional and social problems:
 - Newness to a school.
 - Difficulty making friends.
 - Upset at separation or loss.
 - Being bullied or socially excluded.
- viii. A key arena for bullying is the journey to and from school/clubs. Encourage fearful pupils/young people to travel together. Pupils/young people should be advised to inform staff/team leader should an incident occur and to provide as much detail about the incident as possible.

The reporting of bullying should be made easy for the victim and these procedures may need to vary according to the age and maturity of the person involved. The provision of safe 'communication points' is one of the ways this should be done. Everyone is unique and will favour different methods of communication. These can include:

- i. Talking to the team leader or a member of staff whom the victim trusts and feels comfortable with.
- ii. The use of a written note left in the 'Bullying Box'; a place where pupils in Immanuel School can express concerns about bullying. Notes placed in the box must be clearly named so they can be followed up.
- iii. Peer level sharing: House Captains (plus others) in Immanuel School should be trained in 'Listening Skills' and be available as a listening ear. A clear accountability system must be in place to restrict the spread of gossip.
- iv. Parents are encouraged to talk with either Form Tutors/Principal/team leaders/members of Immanuel Leadership Team should concerns about

bullying arise at home. They may often exhibit distress. Their concerns must be taken seriously.

When bullying is reported to have taken place the following procedure should be followed:

- i. All incidents must be recorded. It is important to record all incidents of bullying and log them.
- ii. Ensure that details are carefully checked before action is taken.
- iii. The bullying behaviour or threats of bullying must be investigated and stopped quickly.
- iv. The team leader/teacher involved in dealing with the incident should issue a warning to the person concerned.
- v. Whilst the person being bullied needs protection, the person/people doing it need to address the reasons for their behaviour and be encouraged to relate to others in more positive ways. An apology should be sought from the person bullying.
- vi. Opportunities for restoration of relationship should also be provided. This may involve highlighting issues for both parties as well as establishing ownership, repentance and forgiveness. Those involved should receive help to be reconciled if at all possible.
- vii. Parental support is often a key to success or failure in anti-bullying initiatives. Though not always apparent, parental approval is important to children and young people of all ages. The majority of parents support anti-bullying measures and are keen to participate. Consultation is important, helping create an ethos in which positive behaviour is encouraged, and bullying considered unacceptable.

Consideration should be given to informing the parents/carers in the event of bullying, but this should only be done if workers are satisfied there is no bullying/abuse going on at home that might exacerbate the situation.

This will involve explaining the nature of the incident/s and our proposals for dealing with it. It is crucial that this is done sensitively because of the other parties involved. Communication with the parents may either be verbal or written.

- viii. Where strategies do not resolve the problem, permanent exclusion may be justified in the most serious and persistent cases, particularly where violence is involved. The way Immanuel deals with discipline issues will include a sufficient range of sanctions to deal with every type of bullying. Make sure that everyone knows what sanctions will be taken. Sanctions should be fairly and consistently applied. These might include:
 - ix. Removal from the group/club.
 - x. Withdrawal of break and lunchtime privileges or detention in Immanuel School.

- xi. Withholding participation in any trip or outside event.
- xii. If it is thought that a serious offence has been committed, consideration will be given after consultation with the Immanuel Leadership Team/ Safeguarding Trustee to contacting the police.
- xiii. After the incident has been investigated and dealt with, the situation should be monitored to ensure repeated bullying does not take place. This should be agreed with both parties. This process will vary according to the complexity of the situation and should be logged, along with the name of the member of staff involved in the situation. Monitoring will help to assess progress and evaluate the anti-bullying policy enabling us to target action where it will be most needed and most effective. Monitoring can reveal:
 - i. How frequently pupils have been bullied.
 - ii. In what ways it has happened.
 - iii. How often they have bullied others.
 - iv. Whom they tell.
 - v. What action was taken and by whom.
 - vi. Where bullying takes place.

See Immanuel School Anti Bullying Procedures for additional information

Q. Special Educational Needs (SEN)

As stated in KCSIE (September 2025), children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Immanuel recognises that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, so we:

- Are careful that behaviour, mood and injury are not assumed to relate to the child's disability and therefore do not require exploration.
- Ensure we look beyond the fact these children are more prone to peer group isolation than other children.
- Recognise when children with SEN and disabilities are being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Recognise and are ready to address communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, all staff responsible for children with SEN maintain a good level of pastoral care and oversight, liaising with DSL, as appropriate.

R. Guidelines re physical contact

Physical contact is a God-given way of expressing care and acceptance to another human being. Whilst being aware of the dangers of inappropriate

physical contact and the need to be wise, we should not be overly fearful. The following points are for guidance:

- Be wise and appropriate in all physical contact with children/young people/vulnerable adults. A hug in the context of a group is very different from a hug behind closed doors. Be aware of one another and don't let child/young person/vulnerable adult/team or staff member/volunteer get into any situation where either is vulnerable to abuse or accusation of abuse.
- Touch should be related to the child, young person's or vulnerable adult's needs, not the worker's.
- Touch should be age-appropriate and generally initiated by the child, young person or vulnerable adult, rather than the worker.
- Avoid any physical activity that may be sexually stimulating.
- All children, young people and vulnerable adults are entitled to personal privacy and the right to decide how much physical contact they have with others, except in circumstances such as a medical emergency.
- If you wish to speak to a child/young person/vulnerable adult away from others, do it in a public area and ensure that another team or staff member/volunteer is aware of what you are doing.
- Due to the effects abuse may have had on a person they may be extremely uncomfortable with expressions of physical affection such as a hug or even a handshake. It is therefore vital to be sensitive and if you think the person would, for example, appreciate a hug or an arm around them they should check this out with them first and only proceed if appropriate safeguards are in place for both you and the person.
- When giving first aid (or applying sun cream etc), encourage the child, young person or vulnerable adult to do what they can themselves but, in their best interests giving appropriate help where necessary.
- Team members should monitor one another in the area of physical contact. They should be free to help each other by constructively challenging anything which could be misunderstood or misconstrued. If you think that an observed action is inappropriate, in an attitude of grace and humility, it should be drawn to the attention of the adult involved and the Designated Safeguarding Lead.
- Staff had Positive Handling Training in November 2023.

S. Guidelines for discipline in clubs including physical intervention

Immanuel's guidelines for discipline in clubs are as follows:

- i. Do not compare a child, young person or adult with another in the group; rather encourage and affirm and, if possible, give them responsibility for appropriate tasks.
- ii. Build healthy relationships and be a good role model by setting an example. You can't expect others to observe the ground rules if you break them yourself.
- iii. Take care to give the quieter and/or well behaved attention and resist allowing the demanding individuals to take all your time and energy.
- iv. Be consistent in what you say and ensure that other team members know what you have said. This avoids manipulation.
- v. Never smack or hit anyone and don't shout. Change voice tone if necessary.
- vi. Call on support from other leaders if you feel so angry you may deal with the situation unwisely.
- vii. Lay down ground rules e.g. no swearing, racism or calling each other names, respect for property, and make sure everyone understands what action will be taken if not adhered to.
- viii. Every person is unique and will respond in different ways to different forms of discipline. It follows therefore each person should be dealt with on an individual basis.
- ix. Working with disruptive children and young people can sometimes be taxing. They can become angry, upset or disruptive. Initially you should:
 - a. Have them sit right in front of you or get a helper to sit next to them.
 - b. Encourage helpers to be pro-active rather than waiting to be told to deal with a situation.
 - c. Challenge them to change their behaviour whilst encouraging their strengths.
 - d. Warn them that you may:
 - i. Speak to their parents/carers about their behaviour.
 - ii. Send them outside the room (under supervision).
- x. Occasionally their behaviour may endanger themselves or others. The Government has developed national standards in relation to early years and

day care and the following guidelines can be used if someone is being disruptive:

- e. Ask them to stop.
 - f. Speak to them to establish the cause(s) of the upset.
 - g. Inform them they will be asked to leave if the behaviour continues.
 - h. Warn them if they continue to be disruptive, this might result in longer-term exclusion from the group.
 - i. If they are harming themselves, another person or property then others in the group should be escorted away from the area where the disruption is occurring. At the same time, and with a second worker present, request them to stop.
 - j. If your request is ignored, you might need to warn the individual that you will consider calling the police.
- k. As a last resort, in the event of them harming themselves, other people or property, physical restraint may be needed using the minimal force necessary, until the police arrive.

The workers involved should always record what happened in writing as soon as possible after the incident. This should include:

- The activity that was taking place.
- What might have been the cause of the disruptive behaviour.
- The person's behaviour.
- What was said and how the worker and others responded.
- A list of others present who witnessed the incident.
- A copy should be given to the team leader, a copy retained by the worker and a copy kept with the logbook. Parents should be informed if their child has been restrained.

See Immanuel School's Discipline Policy for additional information as it relates to the School.

T. Membership of Immanuel

When a child/young person becomes a member or becomes involved in an activity (even on an irregular basis) run by Immanuel, it is important at the outset that a general information and consent form is completed and returned giving contact details of parents/carers, plus medical and other details such as allergies or special dietary requirements. This form should be renewed annually. See model form at Appendix E.

See Immanuel School's Admissions Policy as it relates to the School.

U. Attendance Register

An attendance register should be kept every week of those attending a club or activity, together with a register of the workers. It is good practice to keep parents/carers informed of the nature of activities. Sometimes children/young people will want to join in with our activities without the knowledge of parents or carers e.g. children playing outside or wandering the streets with no adult supervision. In these circumstances it is important to:

- i. Welcome them but try to establish their name, age (children), address and telephone number. Record their visit in a register.
- ii. Ask if a parent/carer is aware where they are, and what time they are expected home. If this is before the session ends, they should be encouraged to return home, unless the parent/carer can be contacted and they are happy with the arrangement. In the case of children in particular, suggest the child seeks the parent/carer's permission to return the following week.
- iii. Link the visiting person with a regular attendee who can introduce them to the group and explain about the activity.
- iv. On leaving, give the person a leaflet about the group with contact telephone numbers etc and perhaps a standard letter to the parent/carer inviting them to make contact.
- v. Without an interrogation, you will need to find out as soon as possible whether they have any special needs, (e.g. medication), so that you can respond appropriately in an emergency.

See Immanuel School's Attendance Policy as it relates to the School.

V. Keeping records

Child Protection records for current pupils are stored securely in the school, as well as archived records for those who have left.

A record is maintained by the DSL, where church team leaders and workers can note unusual events or conversations that they witnessed¹. Every child,

¹ This may be very helpful if, for example, leaders have to deal with a difficult member who subsequently makes an accusation of assault or a young person repeatedly makes sexual comments about workers that may, at a later date, result in an allegation of abuse. In this situation, written records would enable any allegations to be seen in context. Patterns of behaviour or concerns might also emerge from log records that might not otherwise be so obvious - for example, bruising noted on a regular basis or a number of young people making similar comments about one worker that raises concerns. Other information might include records of incidents such as fights and the action taken. Logbooks safeguard both children and workers.

young person, vulnerable adult, parent or carer should be able to view what is recorded about them in the logbook.

This information would need to be kept in a way that does not breach the confidentiality of an individual². Information of a sensitive nature (e.g. a child disclosing abuse) will need to be kept separately in a secure place. It is recommended that these records should be kept indefinitely as advised by insurance companies.

See Immanuel School's Record Keeping Policy as it relates to the School.

W. Supervision ratios

The supervision ratios must be adequate for the size of the group, the age of the children/young people/vulnerable adults and the activities planned. The following ratios are recommended by the government through Ofsted. These are the ratios required in regulations governing day care for under 8's:

- i. For 2 yrs and under there should be 1 adult to every 3 children.
- ii. For 3 yrs there should be 1 adult to every 4 children.
- iii. For 4 to 8 yrs there should be 1 adult to every 8 children.

Note: Day Care regulations (Ofsted) cover activities which last for six days or more in a year, for children up to eight years of age where there is no one with parental responsibility with them and where the activity lasts for two hours or more in a day.

For children over 8, there is no official guidance. Immanuel's practice is a minimum of two adults (one of each gender in mixed gender groups) for up to 20 children, with an additional leader for every 10 children. A risk assessment should be carried out for activities and especially where it is:

- o Outdoors.
- o High risk or dangerous.
- o When catering for people with disabilities or special needs.

The results of the risk assessment may mean ratios need to be increased. There should be an increased adult to child ratio for all swimming trips and prior to the trip the swimming ability of a child/young person/vulnerable adult should be established.

Also see 'Immanuel's Off-site Events Procedures'.

² Whilst it is important to observe data protection requirements, remember safeguarding is always the priority. Information about the prevention and detection of crime is exempt from Data Protection requirements. It may, therefore, be inappropriate to release information to a parent, that has been disclosed by a young person, without first consulting the statutory agencies.

Immanuel School pupil to teacher ratio is covered under Early Years Regulations.

X. Parents staying with children's groups

There may be occasions where parents/carers ask if they can stay to watch the children's group's activity. It is important not to appear guarded but there may be concerns, particularly since our expectation is that all adults who work with children in any capacity should undertake a Disclosure and Barring Service check and other checks. The following principles should be observed:

- i. Parents can be permitted to observe groups but not take part. A distinction should be made.
- ii. It can help certain children settle into a group, if the child knows that a parent/carer is there. After the settling in period, if a parent/carer wishes to continue to stay, consideration could be given to them becoming a helper/worker but they would be required to undertake the same recruitment and selection procedure as with any other worker.
- iii. Remember that whilst a person watching may be a parent/carer for one or more of the children, to the rest of the children they are strangers.
- iv. Organise an open evening from time to time as part of the on-going children's programme to build relationships and encourage parents to take an active role in supporting the group.
- v. Be aware that for some children with special needs, it may be appropriate for their parent/carer to stay with them for an extended period. This should be considered on an individual basis to help the child become fully integrated into the group/activity.

Y. Suggestions and complaints from parents/carers

Where a parent or carer wishes to make a complaint or make a suggestion about any activity provided by Immanuel, it should be taken seriously. It is a good idea in the first instance for them to speak to a member of the Senior Leadership Team who should endeavour to resolve the matter. This should be followed up by a written response to the issue that has been raised and should be recorded and stored appropriately. If the complaint is not resolved to the satisfaction of the parent or carer then the matter should be referred to the Immanuel Leadership Team/ Safeguarding Trustee.

See Immanuel School's Complaints Procedure as it relates to the School.

Z. Home visits

Workers and leaders may need to make home visits from time to time. In these circumstances Immanuel will issue formal identification to the person doing the visit. The following are guidelines for visiting:

- i. Inform a supervisor or another worker of the proposed visit.
- ii. In the case of children and young people never go into a home if a parent or carer is absent unless the child would be at risk of significant harm if you do not do so.
- iii. Keep a written record of the visit detailing the following:
 - Y. Purpose.
 - Z. Time you arrived and left.
 - AA. Who was present.
 - BB. What was discussed.
 - CC. If the parent/carers is absent when the call is made, leave some means of identification and explanation for the visit that can be given to them.
 - o An invitation to a worker's home should only be extended with the knowledge of the team/leadership and the permission of the parent/carers.

Z0. Peer-group activities

All peer-group activities (groups led by 16 to 18 year olds) should be overseen by adults who have been selected in accordance with agreed recruitment procedures. Before setting up a peer-led activity the following should be taken into consideration:

- i. The appropriateness of the venue for the activity.
- ii. Any medical issues, dietary needs and allergies will be appropriately managed.
- iii. Emergency contact numbers are to hand for all members under the age of 18 years.
- iv. If the provision of food is part of the activity, leaders must ensure that food is prepared in accordance with Basic Food Hygiene standards and 'Immanuel's Food and drink safety and hygiene (including kitchen) procedures'.

- v. If a peer-led activity involves under-8s and lasts for two or more hours a week for more than five days a year, it will need to be registered with Ofsted.
- vi. Whilst there may be a valid argument for groups of age 16+ being led and run by their peers, adult leaders should always be in the vicinity and should contribute to any programme reviews and planning. Peer-group leaders must be trained and supported by at least one adult worker. The following should also be followed:
 - i. If there are children/young people under 16yrs at an activity, adults workers should be present or within earshot.
 - ii. No person under the age of 16 should be left with the sole responsibility of caring for or supervising other children or vulnerable adults.
 - iii. Young people (over 16) who assist with caring for other children/young people should be subjected to the same recruitment process as adults and have undertaken safeguarding training.
 - iv. Peer-group leaders should be aware of safeguarding procedures, including reporting concerns (e.g. abuse, bullying) to their supervising adult and that sensitive information should not be shared openly in the group.
 - v. Parents/carers must always be kept informed about what peer-group activities are for, who the leaders are, how they are run, where they meet and what parents can do to support them.

I. Sleepovers

Sleepovers should be discussed and arranged in advance by the workers so that agreements can be made on the best way of caring for the children/young people given the venue, number of children, age and gender mix etc. Be aware of the possibility of abuse by adult and child alike and accept the need to be watchful. The following issues need to be considered when organising a sleep-over:

- i. There must be adequate insurance cover on the building to cover this activity including any limits on numbers.
- ii. Prior to the sleepover the building should be checked for suitable fire exits and workers should know where the water, electricity and gas can be turned off and the location of fire extinguishers. A fire drill should be carried out as soon as possible after entering the premises for the night.
- iii. Parents/carers must complete a medical consent form and an activity consent form in respect of their children's medical care, travel and collection

arrangements, sleeping conditions, food and other specific activities (e.g. games).

- iv. Parents/carers should be given written details of the arrangements for the night with the contact number of an identified children's worker, not simply the phone number of the premises.
- v. Specific responsibilities should be designated to workers to ensure clarity of roles.
- vi. Make sure there is a qualified first-aider in attendance.
- vii. Males and females should sleep separately. If it is a mixed sex group, female and male leaders will be needed.
- viii. Adults should not sleep in the same room as the children.
- ix. Appropriate night attire must be brought.
- x. Changing and showering facilities should be single-sex and separate for children and adults. If there are limited facilities, timetables need to be drawn up.
- xi. All medical information and emergency contact numbers must be easily accessible and workers should have access to a telephone or mobile phone.

See tick list for sleepovers at Appendix E.

Z1. Off-site events

If using an established residential centre, checks should be made that it operates a safeguarding policy and carries out Disclosure checks on workers. Organisations providing residential holidays should also carry out full risk and health and safety assessments.

Where holidays/conferences are being planned with workers from other organisations, it's important that the same appointment process, forms and procedures are used. This can be achieved by one of the organisations assuming responsibility for this (with the agreement of the others) and checked by the Designated Safeguarding Lead.

Workers should be given an opportunity of meeting together before the holiday to discuss the programme/activities. It is also essential that workers receive supervision, to ensure a consistent approach to all work.

Workers should respond to allegations of abuse in accordance with the agreed safeguarding policy and procedures. If there is an allegation against a worker, this should be reported to the police local to the holiday location.

See 'Immanuel's Off-site Events Procedures'.

Z2. First aid

See 'Immanuel's First Aid Procedures'.

Z3. Transport

See 'Immanuel's Off-site Events Procedures'.

Z4. Training

On an annual basis, all staff read the latest edition of Keeping Children Safe in Education (KCSIE) Part One, as well as Annex B and the Immanuel Safeguarding Procedures. They also undergo informal annual refresher training on safeguarding procedures and complete on-screen modules (via TES Develop) throughout the year, on topics such as 'child on child abuse', 'sexual violence & harassment between children & young people' and 'The Prevent Duty' (Updated March 2024). In addition, all staff will read the eSafety Policy (on the website), which is updated annually and all staff are sent and read a range of school policies throughout the year, to keep them up to date - for example the Children Missing Education (CME) policy.

All school staff and volunteers receive a Staff or Volunteer Handbook, as appropriate, and sign a Staff Code of Conduct and an Online Safety Acceptable Use Agreement.

Induction

In addition to the above, all new staff will receive training in Fire Procedures, and be talked through the Behaviour Policy. They will be introduced to the DSL and DDSL, and will be given log in details for our onscreen training provider – TES Develop.

Church staff and volunteers who do not work in the school receive a church staff or volunteer handbook, which contains, among other things, safeguarding procedures. However, many staff work for both church and school, so undergo the same training mentioned above.

Records are kept of all safeguarding related training courses, sessions and reading.

Z5. Photography and filming

- i. As young people/children join any Immanuel clubs or activities, parents/carers are informed that filming and photography may take place, for the purpose of publicity, website and social media. Parents/carers are asked to inform Immanuel in writing if they wish to withdraw permission for their child to be included in this shared media.
- ii. Leaders will ensure appropriate supervision of filming or photography at a club or activity, including storage and disposal of pictures.

See 'Immanuel School's Filming and Photography Policy'.

Z6. Gifts, rewards and favouritism

The giving of gifts or rewards to children, young people and vulnerable adults can be part of an agreed policy for supporting positive behaviour or recognising particular achievements. Any gifts should be given openly and not be based on favouritism. Adults need to be aware however, that the giving of gifts can be seen as a gesture to bribe or groom a young person.

Adults should exercise care when selecting children and/or young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.

Care should also be taken to ensure that adults do not accept any gift that might be construed as a bribe or lead the giver to expect preferential treatment. There are occasions when children, young people or parents wish to pass small tokens of appreciation to workers, for example, on special occasions or as a thank-you, and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Z7. Children left at School Procedure

If a child is not collected from School at the designated time, without any contact from the parent/carer, Immanuel School will try to contact one or both parents/carers and the Additional local contact as listed on the child's Contact sheet. If this proves unsuccessful Immanuel School will contact Children's

Services one hour after the designated pick-up time. This applies to Primary age children and to others who are regularly collected at the end of the school day.

Z8. Prayer ministry procedures

- i. Anyone asking for counselling would be referred to a qualified counsellor - an outside agency or a qualified person associated with Immanuel.
- ii. We offer prayer as a means of support for those Christians experiencing difficulties and asking for such support. This is in the context of relationship only, in consultation with the church leader to whom the person relates.
- iii. We would generally pray in pairs and with those of the same sex. We would not encourage one to one prayer with a member of the opposite sex.
- iv. We seek to offer a secure and private place for those receiving prayer.

Z9. Visitors

All visitors who have not had a DBS check through Immanuel, are required to sign the Visitors' Book and wear a Visitors' Badge. They will not be left alone with any children, young people or vulnerable adults. All visiting speakers will either be well known by staff or vetted accordingly.

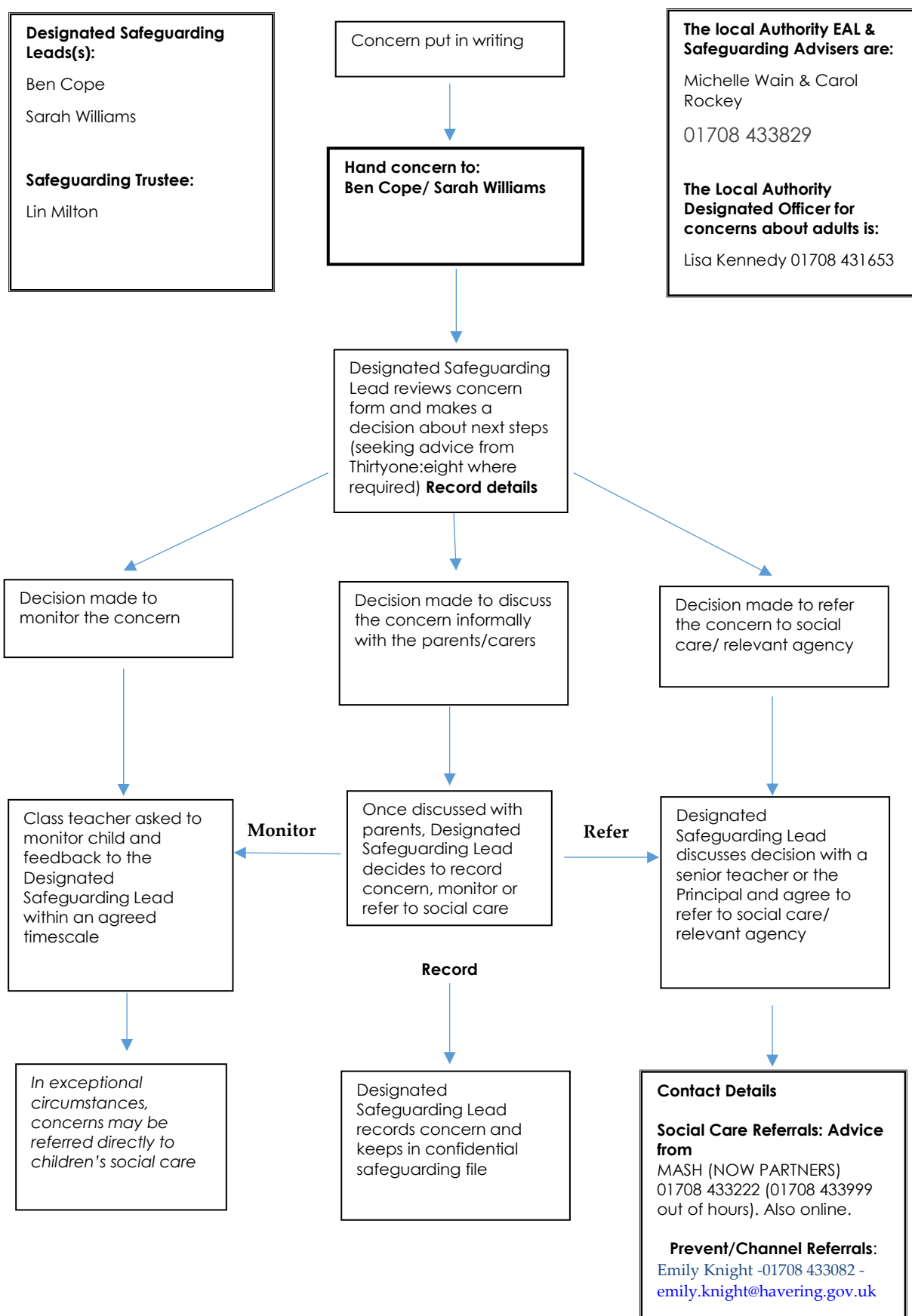
Z10. Key Contact Numbers

Havering LADO from September 2016

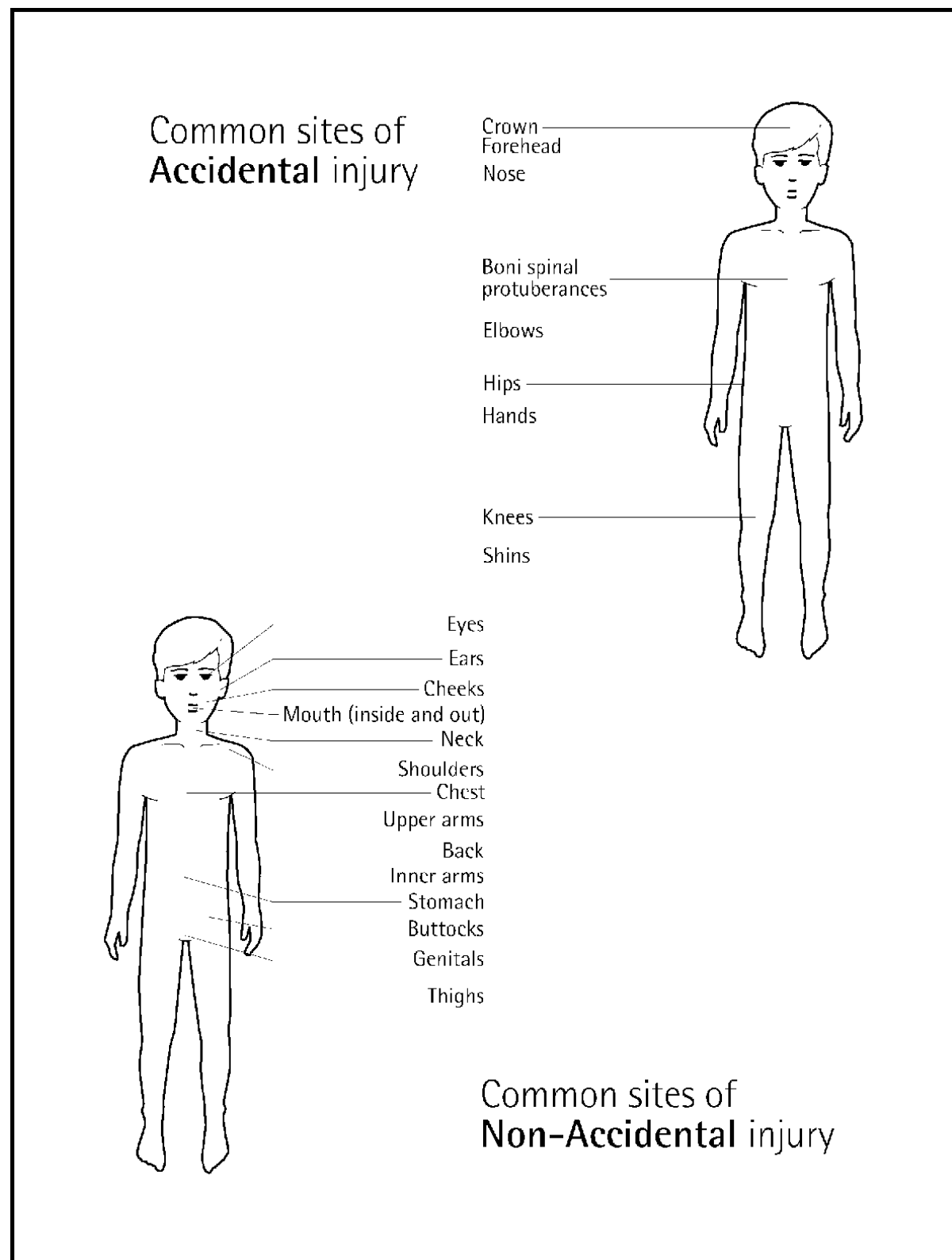
Lisa Kennedy Tel. 01708 431653

Key Contact Numbers are also at the end of Safeguarding Policy.

Appendix A: Flow Chart for Raising Safeguarding Concerns About a Child



Appendix B: Common Sites of Accidental Injury



Appendix C: Confidential Report Form

Area of the work (please tick box):

- | | |
|-------------------------|--------------------------|
| School | <input type="checkbox"/> |
| Youth and children work | <input type="checkbox"/> |
| Family and Toddlers | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |

Name of child/young person/vulnerable adult

Age (approx)

Date (and exact time/place in case of disclosure).....

Adults present.....

Nature of concern - nature of disclosure (circle as appropriate)

Please give as much detail as possible using body shape given on form to describe location in those cases of possible physical abuse. Use back of form if necessary.



Team Leader notified? Yes No

Name of Team Leader.....

Reported by (please sign).....

Appendix D: Immanuel Model General Information and Consent Form (Church)

Organisation:

Full name of child/young person:

Date of Birth:

Address:

.....

Name of GP: Tel No:

Address:

NHS No: Date of last anti-tetanus injection:

Details of any regular medication, medical problem (e.g. asthma, epilepsy, diabetes, allergies, dietary needs, etc.) or disability which may affect normal activity:

.....

Name of parent/carer:

Tel no: Day: Eve: Mobile:

Additional contact (grandparent etc or other holding parental responsibility):

Name: Tel no:

If you do not have parental responsibility (e.g. you are a foster carer/grandparent etc) please give details of those with parental responsibility:

Name(s): Tel no:

Address:

.....

I give permission for to take part in the normal activities of this group. I understand that separate permission will be sought for certain activities, including swimming, and off-site events lasting longer than the normal meeting times of the group.

I understand that while involved he/she will be under the control and care of the group leader and/or other adults approved by Immanuel Core Leadership Team and that, while the staff in charge of the group will take all reasonable care of the children, they cannot necessarily be held responsible for any loss, damage or injury suffered by my child during, or as a result of, the activity.

I understand that whenever specialist medical advice or treatment is needed, the assistance of a GP or A& E Department of a hospital will be sought. I understand that the Children Act 1989 allows a doctor to provide any necessary treatment by doing 'what is reasonable in all the circumstances of the case for the purpose of safeguarding or promoting the child's welfare'.

I have provided you with all necessary information concerning my child's health, allergies, medication etc and I understand that:

- My child will receive medication as instructed before or during the event.
- Every effort will be made to contact me should my child become ill or have an accident.
- My child will be given medical/dental treatment as necessary.

I give permission for my child and the youth/children's workers to communicate using telephone, mobile, email, or internet for the purpose of arranging children/youth activities. Please delete forms of communication you don't want your child contacted by.

I give permission for my child/young person to be given Paracetamol if required: Yes/No

Signed: (parent/or adult with parental responsibility):

Date:

The information requested on this form can be completed by a carer, but only those with parental responsibility can sign the consent. Note: this may not include a foster carer.

**Appendix E: Immanuel General Information and Consent Form
(School)**

Organisation: **IMMANUEL SCHOOL**

Full name of child/young person:
.....

Date of Birth:

Address:
.....
.....
.....

Home Tel No:
.....

Name of father/carer:
.....

Tel No. Day: Eve: Mobile:
.....

Email address:
.....

Name of mother/carer:
.....

Tel No. Day: Eve: Mobile:
.....

Email address:
.....

Additional local contact (grandparent etc or other holding parental responsibility):

Name: Tel No:
.....

Address:
.....

Name of GP: Tel No:
.....

Address:

.....

NHS No: Date of last anti-tetanus injection:

.....

Details of any regular medication, medical problem (e.g. asthma, epilepsy, diabetes, allergies, dietary needs, etc.) or disability which may affect normal activity:

.....
.....

PTO

I give permission for my child to take part in the normal activities of school. I understand that separate permission will be sought for certain activities, including swimming, and off-site events.

I understand that while involved he/she will be under the control and care of the school staff and/or other adults approved by Immanuel Core Leadership Team and that, while the staff in charge of the group will take all reasonable care of the children, they cannot necessarily be held responsible for any loss, damage or injury suffered by my child during, or as a result of, the activity.

I understand that whenever specialist medical advice or treatment is needed, the assistance of a GP or A&E Department of a hospital will be sought. I understand that the Children Act 1989 allows a doctor to provide any necessary treatment by doing 'what is reasonable in all circumstances of the case for the purpose of safeguarding or promoting the child's welfare'.

I have provided you with all necessary information concerning my child's health, allergies, medication etc and I understand that:

- My child will receive medication as instructed during the course of the school day/event.
- Every effort will be made to contact me should my child become ill or have an accident.
- My child will be given medical/dental treatment as necessary.

Signed (parent/or adult with parental responsibility):

.....

Date:

The information requested on this form can be completed by a carer, but only those with parental responsibility can sign the consent. Note: this may include a foster carer.

Appendix F: Tick list for Sleepovers

- i. Building:
 - a. Insurance cover adequate.
 - b. At least two means of exit.
 - c. Fire extinguishers in place and evacuation procedures known.
- ii. Planning ahead:
 - d. Separate sleeping areas for boys and girls and adults.
 - e. Out of bounds areas clearly marked (e.g. i.e. kitchen) and unused rooms locked.
 - f. Appropriate hygiene arrangements made for boys and girls/children and adults.
- iii. Staffing:
 - g. Adequate number of workers for number of children.
 - h. Adequate number of male and female workers.
 - i. Workers have undertaken safeguarding training and hold criminal records disclosure clearance.
 - j. Responsibilities designated to leader/worker (i.e. Cook, first-aider, activity leaders, putting to bed, night patrol, etc.).
 - k. First-aider adequately qualified.
 - l. Chief caterer holds Basic Food Hygiene certificate.
- iv. Parents and children:
 - m. Given written information about the plans for the event.
 - n. Completed medical consent forms and activity consent forms.
 - o. Children informed on the night of ground rules for the event.
- v. Emergency contacts:
 - p. Collect relevant contact numbers prior to the event.
 - q. Make sure the team leader knows the contact numbers of the nearest emergency services - including the nearest hospital.
 - r. Parents given an emergency contact number (mobile of the worker in charge).

Appendix G: Immanuel School Low Level Concerns Procedure

Introduction and Aims

Immanuel has a strong tradition of pastoral care and oversight - recognising and promoting that Safeguarding is **everyone's responsibility**.

Immanuel's approach to Child Protection and Safeguarding is detailed in the ***Immanuel Safeguarding Policy*** and ***Immanuel Safeguarding Procedures*** – including how to deal with concerns and disclosures for pupils. However, the purpose of this procedure is specifically to outline how to deal with:

- Handling a disclosure or reporting a concern.
- Concerns, observations, disclosures or incidents that ultimately **do not** require a MASH referral.
- Concerns, observations, disclosures or incidents that have been referred to a Safeguarding Partner, but do not meet their thresholds.

For convenience, details of how to deal with allegations against staff are also included.

The Procedure - Pupils

Information suggesting that abuse may have occurred can come from a variety of sources. It may have resulted from a direct disclosure on the part of a child or young person, a change in their behaviour, a concern raised by a relative, friend or others within Immanuel or a picture built up over a period of time.

If there is a concern, evidence, or suspicion of any form of abuse, neglect, exploitation, radicalisation or extremism - **no matter how trivial** - the DSL or DDSL must be informed. They will then make the decision whether or not to pursue it as a Child Protection or Safeguarding matter.

Recognition of abuse can be very difficult and sometimes suspicions are no more than vague feelings of unease based on something observed or sensed. What can appear like abuse can be altogether innocent. It's important therefore not to quickly jump to conclusions, whilst at the same time not ignoring concerns, which is why the DSL or DDSL must be informed.

Unless there are obvious signs of abuse or a direct disclosure is made, it is best to allow a picture to develop over a period of time before coming to a decision. In this way it is more likely to be the right decision.

However, if it is clearly a Child Protection or Safeguarding matter, or any form of radicalisation or extremism - even if there is any uncertainty or doubt that it **could be**, the DSL or DDSL will involve outside agencies, such as Thirtyone:eight (for

advice), Children's/ Adult Services, the police, or Channel as appropriate and continue to liaise with them, until the matter is officially closed. Records will be kept of any contact with these agencies and children/ young people will have opportunities to be listened to.

Parental or pupil consent should not be sought for a referral to a statutory agency regarding concerns over child safety. Specific procedural details are outlined below.

Immanuel recognises that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children – see KCSIE (September 2025).

Should Children's Services or Adult Social Care be contacted, possible courses of action could be:

- No MASH referral required – monitor the situation internally, keep accurate records of all conversations and actions - contacting the Local Authority again, if required.
- Make a MASH referral and follow their procedure.

If a disclosure is made, the initial discussion is important and the following advice should be followed:

i. The initial discussion:

- When a person wants to talk about abuse:
 - Listen carefully to what they say.
 - Keep calm.
 - Look the person in the eye.
 - Let the person know you will need to tell someone - do not promise confidentiality.
 - Even when the person has broken a rule, communicate that he/she is not to blame for the abuse.
 - Be aware that the person may have been threatened or sworn to secrecy.
 - Never push for information.
- Helpful things to say:
 - I'm glad you have told me.
 - It's not your fault.
 - I will help you.
 - Is there anything else you wish to tell me?

- The pace should be dictated by the child so do not ask any leading questions. Avoid saying:
 - Why didn't you tell anyone before?
 - I cannot believe it.
 - Are you sure this is true?
 - Why? How? When? Who? Where?
 - False promises.
 - Things like 'I am shocked'.
- Concluding the discussion:
 - Reassure the person it was right to tell you and that you will do everything you can to help.
 - Let the person know what you are going to do next and that you will let him/her know what happens.

ii. Record keeping:

- Make notes as soon as possible (preferably within one hour of the person talking) including a description of any injury, its size, and a drawing of its location and shape on the persons' body. Note its position to see if it has occurred at one of the **common sites of accidental injury** (see below or Appendix A in the *Immanuel Safeguarding Procedures*).
- Write down exactly what has been said, when she/he said it, what was said in reply and what was happening immediately beforehand (e.g. a description of an activity). Note the explanation given for its cause on the Confidential Report Form - see Appendix B.
- Write down dates and times of these events and when the record was made. Write down any action taken and keep all hand written notes even if subsequently typed up.
- These notes should be passed to one of the Designated Safeguarding Leads – Ben Cope, or Sarah Williams (Principal, Immanuel School - who has specific responsibility for Safeguarding in EYFS).
- Always keep in mind that your role is to clarify the facts not to investigate the complaint.
- The DSL/ DDSL must ensure that all documents are signed, dated and kept for an indefinite period in a secure place.

Where concerns do not reach the thresholds for abuse

Where concerns **do not** reach the Local Authority's thresholds for abuse, early help will initially be given by the Tutor for the particular child or young person. This may be through timely interventions such as:

- Arranged meeting with parent/carer – if appropriate
- Referrals to outside Early Help support agencies
- Pastoral session with the Form Tutor
- Should there be a Mental Health concern – the DSL or DDSL may get involved

As with disclosures, records must be kept of any conversations and actions, which are stored in the pupil's file.

The Procedure – Allegations against staff and adults

At Immanuel School, we recognise the possibility that adults working in, or visiting the school may harm children. Any concerns about the conduct of adults in the school should be taken to **Sarah Williams (Immanuel School Principal and Deputy DSL)**, without delay. This includes members of school staff and any other adults on site, such as volunteers, parents, visiting speakers and contractors.

These concerns will then be investigated and:

- Records must be kept of any conversations and actions, which will be stored in the 'Allegations Against Adults' file – even if there proves to be no substance to the allegation.
- Where it is deemed that the allegation has met the harm threshold, the LADO will be informed. If there is evidence of, or a suspicion of serious harm the police will be informed.
- Local Authority procedures for managing allegations against staff, will be followed. This includes the reporting of such allegations to the DBS and the Teaching Regulation Agency (TRA). These procedures are contained in the London Child Protection Procedures (7th edition, updated March 2025).
- Advice should be sought from the statutory authorities before taking any action such as suspension of employment. Refer to **Working Together to Safeguard Children** (updated June 2025) and the document '**Dealing with allegations of abuse against teachers and other staff – Keeping Children Safe in Education (Updated September 2025)**'. This defines an allegation as:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - or

- behaved towards a child or children in a way that indicates that they are unsuitable to work with children.

The suspension of a worker following an allegation is by definition a neutral act but may be necessary because the priority is to protect children, young people and vulnerable adults from possible further abuse or from being influenced in any way by the alleged perpetrator.

The Immanuel School Management Team, in discussion with the Trustees, will report to the Department for Education all appropriate cases where a member of staff:

- Is dismissed.
- Resigns after being accused of misconduct.
- Resigns before enquiries into alleged misconduct are completed.
- Resigns on the award of retirement benefits.
- Where the allegation is against the Principal, the Principal **must not** be informed of the allegation prior to contact with Peter Taylor (Immanuel Leader), the Safeguarding Trustee, the Chair of Trustees and the LADO. On receipt of an allegation, the aforementioned people will discuss immediately, on the same working day, the content of the allegation with Local Authority Designated Officer (LADO), **before taking any further action**.
- All staff are aware that if, for whatever reason, none of the options explained above are available to them, they have a duty to contact the LADO directly, in order to do what is commonly known as 'whistle blowing'.
- Immanuel does not employ supply staff, but should any contractor display any such behaviour, their employers will be informed.

Appendix H - Police and Criminal Evidence Act (1984 – last updated December 2023) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded in the report of the event and placed in the pupil's file.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned³ before questioned about an offence⁴, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

³ The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

⁴ A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
 - a. a police officer;
 - b. employed by the police;
 - c. under the direction or control of the chief officer of a police force; or
 - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>