



# Child Protection and Safeguarding Policy and Procedures

ALLEN EDWARDS PRIMARY SCHOOL

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# Child Protection and Safeguarding Policy and Procedures

## School Safeguarding Leads and Local Authority Contacts

Role	Name
The Senior Designated Safeguarding Leads	Louise Robertson <a href="mailto:lrobertson@allenedwards.lambeth.sch.uk">lrobertson@allenedwards.lambeth.sch.uk</a>
	Nicola Harris <a href="mailto:nharris@allenedwards.lambeth.sch.uk">nharris@allenedwards.lambeth.sch.uk</a>
The Deputy Designated Safeguarding Lead	Philip Slatter <a href="mailto:pslatter@allenedwards.lambeth.sch.uk">pslatter@allenedwards.lambeth.sch.uk</a>
Designated person for Child Sexual Exploitation	Nicola Harris <a href="mailto:nharris@allenedwards.lambeth.sch.uk">nharris@allenedwards.lambeth.sch.uk</a>
Designated teacher for Looked After Children (LAC)	Nicola Harris <a href="mailto:nharris@allenedwards.lambeth.sch.uk">nharris@allenedwards.lambeth.sch.uk</a>
Online Safety Lead	Philip Slatter <a href="mailto:pslatter@allenedwards.lambeth.sch.uk">pslatter@allenedwards.lambeth.sch.uk</a>
Mental Health Lead	Nicola Harris <a href="mailto:nharris@allenedwards.lambeth.sch.uk">nharris@allenedwards.lambeth.sch.uk</a>
In their absence	Claire Harvey <a href="mailto:charvey@allenedwards.lambeth.sch.uk">charvey@allenedwards.lambeth.sch.uk</a>
The Chair of Governors is:	Vaila McClure <a href="mailto:vmcclure@allenedwards.lambeth.sch.uk">vmcclure@allenedwards.lambeth.sch.uk</a>
The governor for safeguarding children is:	Vaila McClure <a href="mailto:vmcclure@allenedwards.lambeth.sch.uk">vmcclure@allenedwards.lambeth.sch.uk</a>

Local Authority Contacts	
Lambeth Integrated Referral Hub:	020 7926 3100 Out of hours: 020 7926 1000
Local Designated Authority Officer (LADO):	<b>Andrew Zachariades</b> Tel: 020 7926 4579 / 0772 082 8700 Email: <a href="mailto:lado@lambeth.gcsx.gov.uk">lado@lambeth.gcsx.gov.uk</a>
Local Authority Safeguarding Lead (early years, primary schools, high schools and colleges):	<b>Deborah Carter</b> Tel: 0202079264679 Email: <a href="mailto:dcarter@lambeth.gov.uk">dcarter@lambeth.gov.uk</a>
Education Prevent Officer:	<b>Lydia Nixon</b> Tel: 020 7926 3668 Email: <a href="mailto:lnixon@lambeth.gov.uk">lnixon@lambeth.gov.uk</a>
Head of Inclusion, Education and Learning:	<b>Stuart Boffin</b> Tel: 020 7926 0296 Email: <a href="mailto:sboffin@lambeth.gov.uk">sboffin@lambeth.gov.uk</a>
CSE coordinator Children's Services:	<b>Claire McDonald</b> Tel: 020 7926 0296 Email: <a href="mailto:CMcDonald@lambeth.gov.uk">CMcDonald@lambeth.gov.uk</a>
Channel Helpline	020 7340 7264
Metropolitan Police Prevent advice line	<a href="tel:08000113764">0800 011 3764</a>



## Purpose and Aims:

The school aims to ensure that:

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

The purpose of Allen Edwards Primary School's safeguarding policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. We create a culture of safeguarding whereby all staff are aware of their statutory responsibilities.

This means we will always work to safeguard and promote the welfare of our children by:

- 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 the impairment of children's mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcome

This policy will give clear direction to all staff including supply staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our school.

Our school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered pupils at our school. The elements of our policy are prevention, protection and support.

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from school or who go missing from education, particularly on repeat occasions. The Attendance Lead will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

This policy applies to all pupils, staff, parents, governors, volunteers and visitors.



## Our Safeguarding Ethos

Allen Edwards is committed to provide a culture of safeguarding whereby we provide an environment where children feel safe and are kept safe with all staff contributing to the culture of vigilance, which is embedded across our school. Safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at their heart.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children, their families and carers have a role to play in safeguarding children. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

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

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe on and offline. The Relationships Education, Relationships and Sex Education and Health Education will cover relevant, topics in an age and stage appropriate way, through a planned, developmental curriculum enabling pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources. Further information can be found in the DfE guidance 'Teaching online safety in school.' and 'Relationships Education, Relationships and Sex Education and Health Education.'

At all times, we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with



Working Together to Safeguard Children (2018) and the Lambeth Safeguarding Children Partnership.

Our school values honesty, respect, tolerance, kindness and trust, along with the United Nations Convention on the Rights of the Child (UNCRC) Articles are at the heart of all school planning, policies and vision as a Rights Respecting School.

The UNCRC articles which inform this policy are:

**Article 2:** Non-Discrimination – The Convention applies to every child without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background.

**Article 3:** Best interests of the child - The best interests of the child must be a top priority in all decisions and actions that affect children

**Article 6:** Life, survival and development - Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential

**Article 12:** Respect the Views of the Child – Every child has the right to say what they think in all matters affecting them, and to have their views taken seriously.

**Article 15:** Freedom of Association – Every child has the right to meet with other children and young people and to join groups and organisations, as long as this does not stop others from enjoying their rights.

**Article 18:** Parental Responsibilities and State Assistance - Both parents share responsibility for bringing up their child and should always consider what is best for the child. Governments must support parents by creating support services for children and giving parents the help they need to raise their children.

**Article 19:** Protection from violence, abuse and neglect - Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.

**Article 20:** Children Unable to Live with their Family - If a child cannot be looked after by their immediate family, the government must give them special protection and assistance. This includes making sure the child is provided with alternative care that is continuous and respects the child's culture, language and religion.

**Article 29:** Goals of Education - Education must develop every child's personality, talents and abilities to the full. It must encourage the child's respect for human rights, as well as respect for their parents, their own and other cultures and the environment.

**Article 32:** Child Labour - Governments must protect children from economic exploitation and work that is dangerous or might harm their health, development or education. Governments must set a minimum age for children to work and ensure that work conditions are safe and appropriate.



**Article 33:** Drug Abuse - Governments must protect children from the illegal use of drugs and from being involved in the production or distribution of drugs.

**Article 34:** Sexual Exploitation - Governments must protect children from all forms of sexual abuse and exploitation.

**Article 35:** Abduction, Sale and Trafficking - Governments must protect children from being abducted, sold or moved illegally to a different place in or outside their country for the purpose of exploitation.

**Article 39:** Recovery from Trauma and Reintegration - Children who have experienced neglect, abuse, exploitation, torture or who are victims of war must receive special support to help them recover their health, dignity, self-respect and social life.



## Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil

outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

## Definitions

### **Safeguarding and promoting the welfare of children means:**

- › Providing help and support to meet the needs of children as soon as problems emerge
- › Protecting children from maltreatment whether that is within or outside the home, including online
- › Preventing impairment of children’s mental and physical health or development
- › Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- › Taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The local authority (LA)
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area



**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- . Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- . Are young carers
- . May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- . Have English as an additional language (EAL)
- . Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- . Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- . Are asylum seekers
- . Are at risk due to either their own or a family member's mental health needs
- . Are looked after or previously looked after (see section 12)
- . Are missing or absent from education for prolonged periods and/or repeat occasions
- . Whose parent/carer has expressed an intention to remove them from school to be home educated

## Human Rights

*“Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 201022, (including the Public Sector Equality Duty23), and their local multi-agency safeguarding arrangements.”*

At Allen Edwards, we ensure that we act in a manner that supports the European Convention for Human Rights and ensure that we:



- Ensure the right to freedom from inhuman and degrading treatment (Article 3)
- We respect the right for private and family lives of our pupils
- We ensure that the freedoms set out in the Equality Act are protected and applied without discrimination
- We protect all of our children's right to an education
- We recognise and respond to the fact that harassment, violence and abuse including that of a sexual nature, can breach some or all of these rights.

## Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- . Behaviour policy
- . Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- . Healthy and respectful relationships
- . Boundaries and consent
- . Stereotyping, prejudice and equality
- . Body confidence and self-esteem
- . How to recognise an abusive relationship (including coercive and controlling behaviour)
- . The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- . What constitutes sexual harassment and sexual violence and why they're always unacceptable

## The Role of the Governing Body

The governing board will:

- . Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- . Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- › Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
  - Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.



## The Role of Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
  - Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

## The Role of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead

The DSL is a member of the senior leadership team. Our DSLs are Louise Robertson and Nicola Harris. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of school hours, they can be contacted via email at

[lrobertson@allenedwards.lambeth.sch.uk](mailto:lrobertson@allenedwards.lambeth.sch.uk) or [nharris@allenedwards.lambeth.sch.uk](mailto:nharris@allenedwards.lambeth.sch.uk)

When the DSLs are absent, Phil Slatter, Assistant Headteacher, will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- › Contribute to the assessment of children



- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Have a good understanding of harmful sexual behaviour
- › Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- › Keep the headteacher informed of any issues
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and Deputy are set out in their job description.

### **The Role of the Allen Edwards' Staff**

Allen Edwards' staff are particularly important as they are in a position to identify concerns early, provide help for children and prevent concerns from escalating. If staff members have any concerns about a child's welfare they should report the matter to the Designated Safeguarding Lead (DSL), Louise Robertson, or the deputy safeguarding lead, Nicola Harris, directly and then to log the concerns on CPOMS, our school safeguarding portal.

If a child is in immediate danger or is at risk of harm, the Safeguarding Designated Lead will refer to children's social care and/or the police immediately.

Although the responsibility to refer to children's social care lies with the Designated Safeguarding Lead, anyone can make a referral. Where referrals are not made by a member of staff, the DSL should be informed as soon as possible.

All staff will:

- › Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- › Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance



- › Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- › Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- › Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the Behaviour Policy, the Internet and Online Safety Policy, which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- › What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.



## Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

## Confidentiality

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We will also share personal data with law enforcement and government bodies where we are legally required to do so
- We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

(See Data Protection Policy for further information)

We note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)



- . The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- . Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- . Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- . Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- . Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- . The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- . If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

## Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- . Is disabled
- . Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- . Is a young carer
- . Is bereaved
- . Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- . Is frequently missing/goes missing from education, care or home
- . Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- . Is at risk of being radicalised or exploited
- . Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- . 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
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### **If a child is suffering or likely to suffer harm, or in immediate danger**

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

Lambeth procedures for making a referral are set out below:

1. Consider the [Levels of Need Guidance](#) to help you identify the right help at the right time for the child and family
2. Call the Integrated Referral Hub on [020 7926 3100](tel:02079263100) to discuss your concerns and to ask for advice
3. Complete the digital [Multiagency Referral Form \(MARF\)](#)
4. You can also email the Integrated Referral Hub at [helpandprotection@lambeth.gov.uk](mailto:helpandprotection@lambeth.gov.uk)

Below is the government’s webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

### **If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

- › Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- › Stay calm and do not show that you are shocked or upset



- › Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- › Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- › Pass this on to the DSL immediately
- › Write up your conversation on CPOMS or handwritten, if necessary, as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Sign and date the write-up and pass it on to the DSL if it is written. CPOMS will alert the DSL automatically.
- › Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- › Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- › Not recognise their experiences as harmful
- › Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

### **If you discover that FGM has taken place or a pupil is at risk of FGM**

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act



was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow Lambeth's local safeguarding procedures.

Lambeth's Procedure is:

1. If a child is at immediate risk of significant harm, please dial 999.
2. Call Lambeth's Social care team on Professionals line 0207 926 3100, Public line 020 7926 5555
3. Complete a Multi-Agency Referral Form.

### **If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 below illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### **Early Help Assessment**

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may



be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Lambeth's Early Help Procedure:

- **Call Professionals' Line: 020 7926 3100 or Email: [dutymanager@lambeth.gov.uk](mailto:dutymanager@lambeth.gov.uk)**

Complete a referral for Early Help in writing by filling in a Common Assessment Framework form and forward it to the email address above.

## Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Local Authorities Referral process:

1. If a child is at immediate risk of significant harm, please dial 999.
2. Call Lambeth's Social care team on Professionals line 0207 926 3100, Public line 020 7926 5555
3. Complete a Multi-Agency Referral Form.

Process for Escalation of a Referral:

Stage 1: Professional engagement and challenge in cases where professionals consider a child to be at immediate risk of significant harm, concerns must be escalated to their manager/supervisor and/or safeguarding lead on the same working day. In cases where there are concerns, but the child is not considered to be at an immediate risk of significant harm, professionals should, in the first instance, attempt to resolve differences or concerns through discussion and/or by meeting with the relevant practitioner/agency within 5 working days or a within a timescale that protects the child from harm (whichever is less). At no time should professional disagreement detract from ensuring that a child is safeguarded. The child's



welfare and safety is paramount and all professionals and agencies are responsible for communicating such concerns as per the guidance provided in Working Together to Safeguard Children (2018) and the London Child Protection Procedures. The person raising a concern must always record information about the child, a brief description of their concern and the outcome sought and a copy of it must be kept on the records of the child subject of the concern. When the concern is escalated, this written information must be provided.

**Stage 2: Line Manager** If the professionals are unable to resolve the matter satisfactorily, the concern must be escalated to the practitioner's line manager within 24 hours and a resolution should be achieved within 5 working days or a within a timescale that protects the child from harm (whichever is less).

**Stage 3: Agency Safeguarding Leads** If agreement cannot be reached following discussions between the practitioners' line managers, the issue must be escalated to the relevant safeguarding leads for the agencies concerned within 24 hours.

**Stage 4: Joint agency collaboration** The safeguarding leads must work together to consider a strategy to resolve the matter and will communicate the outcome to the individuals/agencies involved. A multi-agency meeting should be called. At this meeting, all agencies should share the information they have regarding the child and family, clearly outlining their view on the risks and opportunities they identify in safeguarding the child.

**Stage 5: Head of Service** If a satisfactory resolution to the concern cannot be achieved, the safeguarding leads will escalate the matter to the Head of Service within their agency within 5 working days or a within a timescale that protects the child from harm (whichever is less).

**Stage 6: Lambeth Safeguarding Children Partnership** in the unlikely event that the issue cannot be resolved by the steps described above and/or the discussion raises significant policy issues, the Head of Service will refer the matter to the Lambeth Safeguarding Children Partnership for resolution within 5 working days or less, depending on urgency. Professionals involved in the conflict resolution process must keep contemporaneous records of any intra and inter agency discussions and actions taken and ensure that this is recorded on the child's file, together with any other written communication and information. Circumstances where the policy is over-ridden There are certain instances where the escalation policy described here should be over-ridden and the Director for Children's Services (DCS) and the Lambeth Safeguarding Children Partnership should be made immediately aware by whoever first comes to know.

These are instances of:

- Child death
- Life changing injury
- Abduction of child on a Child Protection plan or in care
- Immediate threat of judicial review; or
- Imminent threat of media attention, particularly which might place a family under stress

### **If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- › Think someone is in immediate danger
- › Think someone may be planning to travel to join an extremist group
- › See or hear something that may be terrorist-related

### **If you have a concern about mental health**

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the school and Lambeth's referral process.

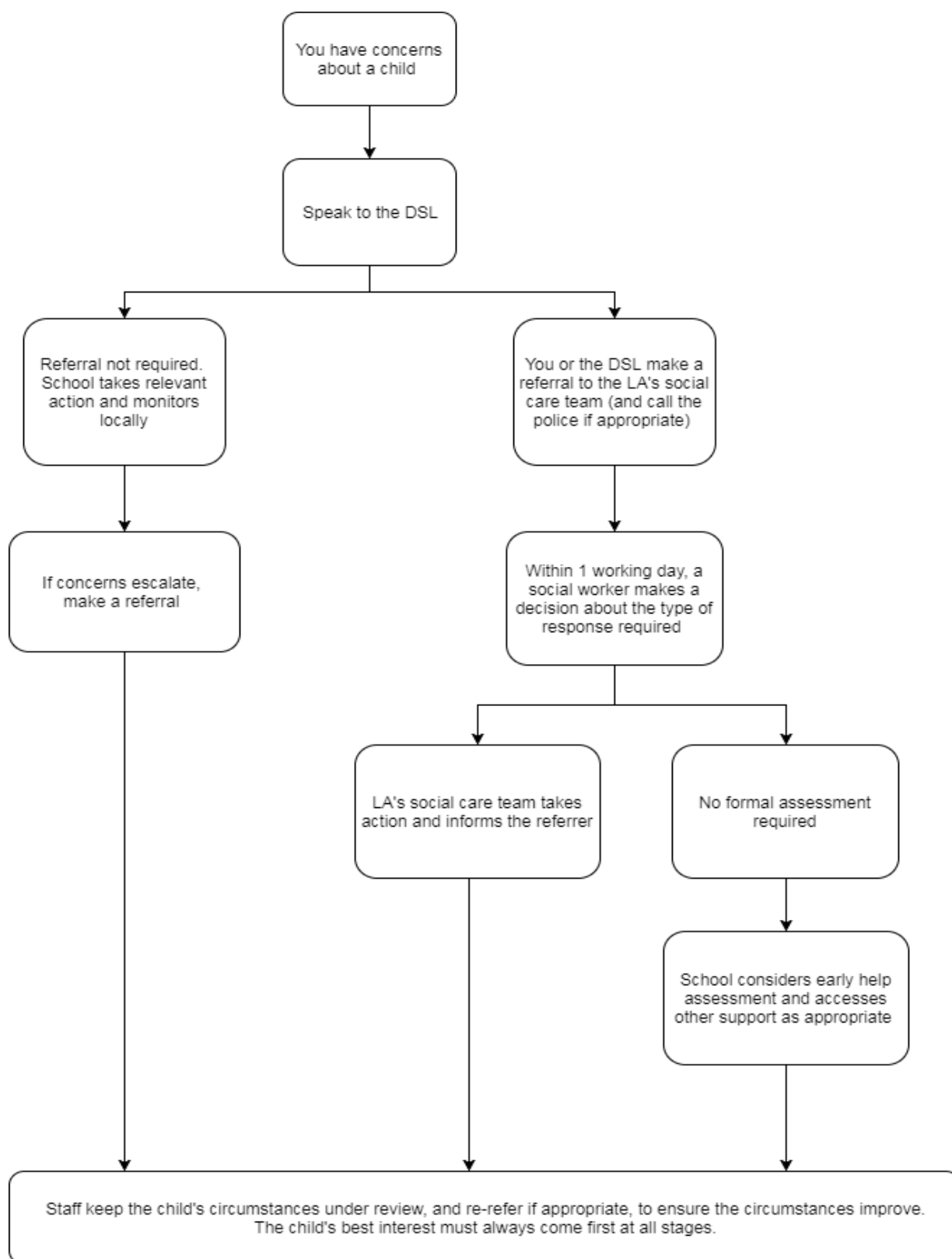
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. See Mental Health Policy for further details.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**



(Note – if the DSL or DDSL is unavailable, this should not delay action, report to a member of SLT)



### Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the

headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

### **Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

See appendix 4 for more information about child-on-child abuse.

### **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if

needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Incidences of Child-on-Child abuse will all be reported to the senior leadership team and recorded on CPOMS. Each incident will be investigated thoroughly by the senior leadership team. Parents/ carers will be kept informed at all stages. Depending on the level of incident, different actions will be taken to ensure that the victim feels safe and supported. School will endeavour to maintain anonymity for the victim and perpetrator but where this is not possible, support will be put in place for both parties. There will be therapeutic support available to all involved before, during and after the investigation.

See Behaviour Policy and Anti-Bullying Policy for further information on the procedures for recording, investigating and dealing with allegations, and supporting victims, perpetrators and other children affected.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners



- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- . Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- . There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **Sharing of nudes and semi-nudes ('sexting')**

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident:

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult



- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through our School Liaison Officer, PC Zane Da Silva ( [zane.dasilva.3653@btp.police.uk](mailto:zane.dasilva.3653@btp.police.uk) ) or dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS. The record-keeping arrangements set out in this policy also apply to recording these incidents.

### **Curriculum coverage**

Appropriate education on the basic principles of consensual image sharing are delivered to primary-aged children through our computing curriculum, without the need to discuss the sharing of nudes and semi-nudes specifically.



## Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Children should report any concerns that they have to the adult that they feel comfortable doing so. All adults at Allen Edwards are trained to know how to respond to disclosures and how to escalate them.

At the start of each year, we discuss with pupils how they can report to an adult if they have any concerns and what this will look like if they do. We explain that they can speak to any adult that they feel comfortable doing so with and children are made aware of who the DSL and DDSL are in school. This is also displayed around the building. We reiterated this each term in assembly, PSHE, RSE and at other points across the curriculum.

## Online Safety and the Use of Mobile Technology

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

To address this, our school aims to:

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

## The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism



- › **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- › **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- › **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)



- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. **(See computing and Online Safety Policy).**
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

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

### **Artificial intelligence (AI)**

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Allen Edwards Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Allen Edwards Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour Policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

### **Notifying Parents or Carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or



local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- . Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- . Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

### **Pupils with Special Educational Needs, Disabilities or Health Issues**

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- > Music Therapy
- > Psychotherapy
- > Speech and Language Therapy
- > Art Therapy
- > Place2Be Counselling
- > Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

### **Pupils with a Social Worker**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.



The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- › Responding to unauthorised absence or missing education where there are known safeguarding risks
- › The provision of pastoral and/or academic support

### **Looked-After and Previously Looked-After Children**

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

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

We have appointed a designated teacher, Nicola Harris, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- › Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

### **Pupils who are lesbian, gay, bisexual or gender questioning**

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. We have a significant therapeutic offer at Allen Edwards and will use this to support pupils.

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

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

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

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

## **Complaints and Concerns about School Safeguarding Policies**

### **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### **Other complaints**

In accordance to KCSIE 2024, complaints if an allegation is received relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the member of staff receiving the information should inform the Headteacher immediately. Where concerns are raised about an individual and the school is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome.

The Headteacher or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the school is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the School will usually take the lead in conducting an investigation



as we have direct access to any affected children and other school staff to collect the facts.

### **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil where the significant harm threshold is met:

You must record the allegation and tell the DSL but do not investigate it

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

All incidences will be recorded on CPOMS and dealt with in accordance to our Behaviour Policy and multi-agency advice. Support will be offered to both victim and perpetrator.

### **Whistle-Blowing**

See Whistle-Blowing Policy.

### **Record-Keeping**

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern

- Details of how the concern was followed up and resolved

- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.



Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

All records are kept electronically in a secure password protected system on the school server. Records are also kept on CPOMS ensuring that only DSLs can access these records.

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF ADMINISTRATIVE LIFE OF RECORD
Child protection files	Date of birth + 25 years	Secure disposal
Allegation of child protection nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Secure disposal

### Keeping records of allegations made against staff

If allegations of abuse made about a member of staff were found to be malicious or false, remove details of those allegations from personnel records.

For all other allegations:

- Keep a clear and comprehensive summary of the allegation, including details of how it was followed up; how it was resolved; any action taken; any decisions reached; and the outcome
- Provide a copy of the report to the person concerned, where agreed by children's social care or the police
- Keep a declaration on whether the information will be referred to in any future reference

This is to make sure:

- Accurate information can be given in response to requests for a reference in future

- Clarification can be given where future DBS checks reveal information about allegations that did not result in a criminal conviction

Records of allegations should be retained at least **until the accused person has reached normal pension age**, or for a period of **10 years** from the date of the allegation if that is longer.

This is set out in paragraphs 415 to 417 of the statutory safeguarding guidance, [Keeping Children Safe in Education](#) (KCSIE) 2023.

### Keeping court orders relating to pupils

Under the requirements of UK data protection law, you must not keep more personal information on file than is absolutely necessary. Therefore, you should only keep a copy of a court order relating to a pupil if having this extra information would be useful. We may wish to see and retain a copy of the court order to make sure you have enough information to keep the pupil safe – but that we will decide what is appropriate.

In most cases, we will record:

- That there's a court order in place for the pupil
- Who informed the school of the court order
- What arrangements the school needs to have in place to support the court order

## Training

### All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.



### The DSL and Deputy

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, they receive training in managing allegations for this purpose.

### Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See Safer Recruitment Policy for more information

### Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

### Monitoring arrangements

This policy will be reviewed **annually** by Nicola Harris. At every review, it will be approved by the full governing board.

### Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Health and Safety
- Attendance
- Computing and Online Safety
- Mobile Phone Use
- Equality
- Relationships and Sex Education





- First Aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Designated Safeguarding Lead
- Low Level Concerns
- Whistleblowing
- Safeguarding Response to Children Missing From Education

List any other related policies and procedures that the school has here – for example, whistle-blowing, anti-bullying or IT acceptable use, if you have these separately.

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

- › Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- › Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- › Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- › Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing



- › Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

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

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

## **Appendix 2: specific safeguarding issues**

### **Children who are absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a school
- › Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when

removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation
- › Suffering from changes in emotional wellbeing
- › Misusing drugs and alcohol
- › Going missing for periods of time or regularly coming home late
- › Regularly missing school or education
- › Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- › Having an older boyfriend or girlfriend
- › Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- › Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- › Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- › Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- › Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- › Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)



- › Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- › Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will report to the DSL or DDSL, within the school day.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
  - › A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- › Speak to the pupil about the concerns in a secure and private place
- › Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- › Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- › Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### Preventing radicalisation

- › **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- › **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance

of different faiths and beliefs. This also includes calling for the death of members of the armed forces

› **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance
- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or X (Twitter)



- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will report to the DSL or DDSL and we will follow our procedures (See appendix

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including Computing and Online Safety Policy.

### Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:



- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will report to the DSL or DDSL and follow school procedures.

### **Serious Violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- › Being male
- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification and DBS where appropriate.

Visitors are expected to sign in and wear a visitor's badge at all times.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:



- › Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- › The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### Non-collection of children

If a child is not collected at the end of the session/day, we will:

Continue to attempt to contact the parents until 4pm.

At 4pm, we will contact each of the three contacts that we retain for each pupil.

If we are unable to get hold of emergency contacts or parents and carers, we will then contact the police.

Children will remain in the care of a member of SLT whilst this is carried out.

Incidents on no-collection will be recorded on CPOMS.

Further action will be determined based on all information the school holds. This may include reporting to the police.

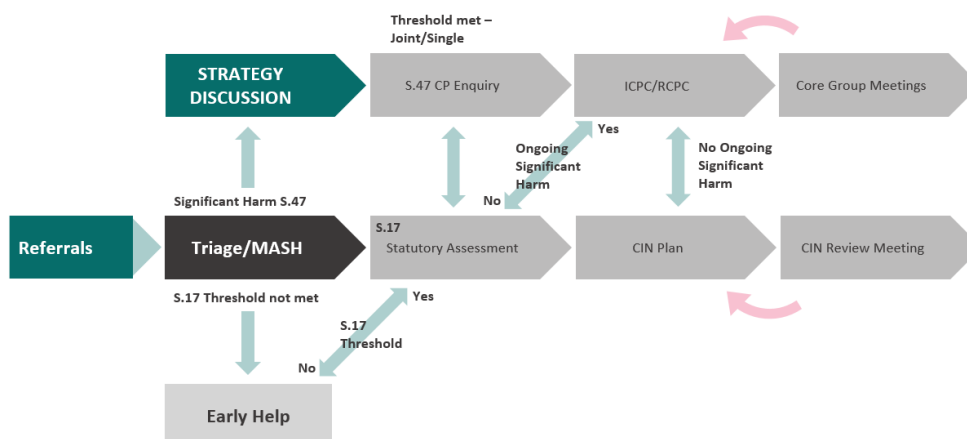
### Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Please refer to our Safeguarding Response to Children Missing from Education.

## Appendix 3 – Children’s Services Process

### Children’s Services Process





## Appendix 4 – Prevent concerns process

There are concerns about a child.

Step 1: speak to the child and clarify what they meant by comments or what is causing specific behaviours of concern.

Step 2: Inform DSL immediately.

Step 3: DSL will speak with other teachers and the child to gather more information.

Step 4: deciding level of need. Where appropriate, DSL will contact Prevent Officer, Lydia Nixon, for advice or Lambeth Safeguarding Team. This step may not be necessary once information from the child has been gathered to better understand the concerns. All discussions with the Prevent Officer will be shared with the Prevent policing team, who use this to develop a full picture of concerns.

Step 5: speak with parents. This step may come before step 4 depending on concerns.

Step 6: if advised by Prevent Officer or Safeguarding team, a MARF (safeguarding referral) will be made to social care.

Step 7: partners will share information on housing, social care, mental health and wellbeing etc. to gain a greater understanding.

Step 8: Police will carry out a vulnerability assessment

Step 9: Case discussed at Channel (school will attend): does this meet threshold? What support is needed? How best can that support be provided?

All of the above will be recorded on CPOMS.

If there is an immediate risk of harm, the policy will be called on 999 by the DSL.