Harlyn Primary School

Safeguarding and Child Protection Policy and Procedures

Approved by: **Full Governing Board**

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1. PURPOSE & AIMS

This safeguarding policy ensures every child is safe, protected from harm and supported to thrive. We recognise that safeguarding and promoting the welfare of

children is everyone's responsibility and that the best interests of the child will always be our primary consideration in all decisions affecting them.

This means we will always work to ensure:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities in respect of safeguarding.
- All staff are appropriately trained in recognising and reporting safeguarding issues.
- We identify children and young people who may need extra help.

This policy will provide clear direction to staff, volunteers, visitors, parents, and carers about expected behaviour and our responsibilities to safeguard and promote the welfare of all children and young people.

The school fully recognises the contribution it can make to protect children from harm and to support and promote the welfare of pupils within the school. The elements of our policy are prevention, protection, and support.

This policy applies to all staff, governors, volunteers, contractors, visitors and any individual or organisation providing services on behalf of the school, together with all children receiving education or other services from the school.

2. LEGISLATION AND STATUTORY GUIDANCE AND ADVICE

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026).

We comply with this guidance and the arrangements agreed and published by Hillingdon Safeguarding Children Partnership.

This policy is also based on the following legislation/guidance. This list is not exhaustive. The school will also have regard to any other relevant legislation, statutory guidance and local safeguarding partnership procedures issued from time to time.

- 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 the Children Act 2004, 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 regard 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 (as amended), which defines regulated activity in relation to children.
- The Prevent duty: safeguarding learners vulnerable to radicalisation and 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 regarding 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.
- Children Missing Education guidance
- Preventing and Tackling Bullying 2017
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' (February 2022)
- What to do if you're worried a child is being abused', DfE (March 2015)
- Information sharing: advice for practitioners providing safeguarding services (May 2026)
- Child Sexual Exploitation: A definition and guide for practitioners, local leaders and decision makers DfE (2017)
- Criminal exploitation of children and vulnerable adults: county lines
- Meeting Digital and Technology Standards in Schools and Colleges (March 2025)
- Working together to improve school attendance
- Sharing nudes and semi-nudes: how to respond to an incident (overview) guidance
- Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension
- Searching, screening and confiscation in schools
- The London Safeguarding Children Procedures

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 the safeguarding and welfare requirements of the statutory framework for the Early Years Foundation Stage

3. DEFINITIONS

"Children" includes everyone under the age of 18.

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

Child protection is part of this definition and refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer significant harm.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children. Children may also cause harm to other family members, sometimes referred to as child-to-parent or caregiver abuse.

Abuse is often categorised into four types of harm; neglect, physical, sexual, or emotional. For definitions of these individual categories of harm, see Working Together to Safeguard Children.

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. Neglect may occur during pregnancy because 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 caregivers).
- Ensure access to appropriate medical care or treatment.

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

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.

4. EQUALITY STATEMENT

Some children are at increased risk of abuse, 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 recognise those to be children who:

- are disabled or have certain health conditions and have specific additional needs
- have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan)
- have a mental health need
- have a medical condition which may make them more vulnerable to abuse, neglect or exploitation
- are young carers
- are pregnant and/or are parents themselves
- have exhibited early signs of abusive, violent and/or harmful behaviours
- have been repeatedly removed from the classroom or are on a part-time timetable
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are frequently missing/goes missing from education, home or care,
- have experienced multiple suspensions, are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- are at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation
- are at risk of being radicalised or exploited
- have a parent or carer in custody, or are affected by parental offending
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing alcohol and other drugs themselves
- are at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- are privately fostered

Provisions within the Equality Act allow schools to take positive action, where it can be demonstrated that it is proportionate to deal with particular disadvantages affecting pupils with certain protected characteristics in order to meet their specific need.

5. OUR ETHOS

The child's welfare is of paramount importance. We will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to, and are safe. Children will be able to talk openly to any member of staff if they are worried or concerned about something.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that school staff play a particularly important role

as they can identify concerns early and provide help for children to prevent concerns from escalating. **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.

We recognise that children may not feel ready or able to tell someone that they are being abused, exploited or neglected and that, for a number of reasons, they may not recognise their experiences as harmful. Staff will therefore remain professionally curious and vigilant to changes in a child's presentation, behaviour or circumstances.

All staff and regular visitors will, through induction and training, know how to recognise emerging needs, indicators of abuse and neglect, and wider safeguarding concerns, how to respond to a disclosure from a child and how to record and report this information. They will not make promises to any child and will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose should it outline a safeguarding concern.

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.

Throughout our curriculum we will provide activities and opportunities for children to develop the knowledge and skills they need to recognise risk, build resilience, seek support and stay safe.

6. ROLES AND RESPONSIBILITIES

(Insert details and roles in line with the organisation).

Role	Name	Contact Details
Designated Safeguarding Lead	Simon Jones	sjones@harlynprimaryschool.co.uk
Deputy Designated Safeguarding Lead	Shruti Mistry Noorine Mussa	smistry@harlynprimaryschool.co.uk nmussa@harlynprimaryschool.co.uk
Headteacher	Simon Jones	As above
Safeguarding Governor	Sally de Jongh	sdejongh@harlynprimaryschool.co.uk
Chair of Governing Body	Sally de Jongh	As above

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and visitors of the school and is consistent with the procedures outlined by Hillingdon Safeguarding Children Partnership. Our policy and procedures also apply to extended school and off-site activities and include the responsibility to provide a safe environment.

The schoo 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 an inclusive, anti-discriminatory culture where racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities, alongside a culture of zero tolerance of sexism, misogyny/misandry, homophobia,

biphobia, sexual violence/harassment, derogatory behaviour and other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex, and health education (PSHE), which is inclusive and delivered regularly and covers issues such as:
    - Healthy and respectful relationships.
    - Boundaries and consent
    - Stereotyping, prejudice, and equality.
    - Body confidence and self-esteem.
    - How to recognise an abusive relationship (including coercive and controlling behaviour).
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
    - What constitutes sexual harassment and sexual violence and why it is always unacceptable.

All staff will read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. School leaders and staff who work directly with children will also read Annex A. The school will ensure that appropriate staff are familiar with other relevant parts of Keeping Children Safe in Education, including Part Five on child-on-child sexual harassment and sexual violence, according to their roles and responsibilities. All staff will sign a declaration to confirm that they have read and understood the guidance provided to them, reinforce the importance of online safety when communicating with parents/carers and create a culture for pupils to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy, and the safeguarding response to children who go missing from education.
- The processes for community-based Early Help and Family Help and their role in them, including identifying emerging needs, understanding the local criteria for support, liaising with the DSL and sharing information with other professionals to support early identification, assessment and coordinated support.
- 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, 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 and radicalisation.
- The importance of reassuring all children 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, bisexual or gender questioning can be targeted by other children.
- What to look for to identify children who need help or protection.

The Governing Board

The Governing Board is accountable for ensuring the effectiveness of this policy and the school's compliance with it. The Governing Board takes collective responsibility for safeguarding and promoting the welfare of pupils. We also have a named safeguarding Governor who governs safeguarding across the school (see previous table).

The governing board will ensure that:

- The safeguarding policy is in place and is reviewed annually (as a minimum), is available publicly via our website and has been written in line with Hillingdon expectations and the requirements of our policies and procedures.
- Our school contributes to inter-agency working in line with Working Together to Safeguard Children.
- A senior member of staff from our leadership team is designated to take the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The board will consider the number of and age range of pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- The board will regularly review the filtering and monitoring standards and liaise with IT staff and service providers to identify further actions in meeting standards.
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- All staff undertake appropriate child protection training that is updated at least annually.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm/risk of harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors).
- Safer recruitment practices are followed in line with the requirements of Keeping Children Safe in Education.
- The governing board remedy without delay any weakness regarding our safeguarding arrangements that are brought to their attention.
- That this policy reflects 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 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.
- Ensure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- Ensure 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' if an allegation of abuse is made against the Headteacher, where appropriate.

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

At agreed intervals the safeguarding Governor will receive a safeguarding report that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils.

The 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 practice, 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 and exploitation.

Additionally, the Headteacher is responsible for:

- Identifying a member of staff to be the Designated Safeguarding Lead (DSL).
- Identifying additional members of staff to act as Deputy Designated Safeguarding Lead (DDSL) in their absence to ensure there is always cover for the role.
- Ensuring that staff (including temporary staff) understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect and exploitation.
- Communicating this policy to parents when their child joins the school and via the school website.
- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Review the effectiveness of filtering and monitoring provision at least annually, ensuring appropriate checks are undertaken across all internet-connected devices and relevant locations, with a record of those checks maintained.
- Ensure harmful and inappropriate content is blocked, without unreasonably impacting teaching and learning.
- Ensure effective filtering and monitoring strategies are embedded to meet the school's safeguarding needs.

- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Ensuring a positive culture of safeguarding permeates throughout the school.
- Liaise with the Designated Officer from the Local Authority (LADO) in the event of an allegation of abuse being made against a member of staff or volunteer.
- Acting as the "case manager" in the event of an allegation of abuse is made against another member of staff or volunteer, where appropriate.
- Ensuring that the procedures for the management of low-level concerns in respect of staff and volunteers is adhered to, with LADO consultation as appropriate.
- Ensuring the relevant staffing ratios are met, where applicable
- Ensuring each child in the Early Years Foundation Stage is assigned a key person.

Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the attendance, educational achievement and progress of pupils with a Social Worker and those in Kinship Care arrangements.

They should also identify and engage with key professionals, e.g., DSLs, SENCOs, Social Workers, mental health leads and others.

The Designated Safeguarding Lead (DSL)

The DSL is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection in our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of Keeping Children Safe in Education).

During term time, the DSL (or an appropriately trained deputy) will always be available during school hours for staff to discuss safeguarding concerns. If, in exceptional circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and any other relevant media.

The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers, and regular visitors have received appropriate child protection information during induction and that appropriate training needs are identified.

The DSL will maintain written records and child protection files, ensuring that they are kept confidential and stored securely.

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 lead responsibility for the school's approach towards online safety, including the management of appropriate filtering and monitoring on school devices and school networks.

- 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.
- 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 children who have caused harm) in sexual violence and sexual harassment and be confident as to how to access this support (please refer to s.29 – Local Authority Details).
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a Police investigation or search.

The DSL will also keep the Headteacher informed of any issues and liaise with Local Authority case managers for child protection concerns as appropriate.

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

7. CONFIDENTIALITY AND INFORMATION SHARING

The data protection laws (the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025) govern how personal information is processed and shared by organisations.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Further information can be found in the Department for Education's Data Protection in Schools guidance, which supports schools in complying with data protection legislation while ensuring appropriate information sharing for safeguarding purposes. When deciding whether information needs to be shared with practitioners within the setting or with other agencies, practitioners should take account of the following principles, bearing in mind that the most important consideration is whether sharing information is likely to support the safeguarding and protection of a child:

- Necessary & Proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure
- Recorded

Practitioners should consider when they share information, who they share it with, how much they share, and where possible they should be transparent about the fact that they're sharing. It is important to acknowledge that sharing of information could

be essential for the protection of the child. Staff should never assume that someone else will share information or take action. Where there is any doubt, advice should be sought from the Designated Safeguarding Lead without delay.

Although the process for deciding whether to share information is the same within and outside a setting, in terms of proportionality and the need to know, sharing information (and the decisions around it) with practitioners from other agencies needs to be documented. It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children's general needs are met in school. However, staff should report all child protection and safeguarding concerns to the DSL or, in their absence, a Deputy DSL or Headteacher or – in the case of concerns about the Headteacher – to the Chair of Governors. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the data protection officer.

Every effort will be made to prevent unauthorised access to sensitive information. Portable devices such as mobile phones, laptop computers, tablets or on portable media will be kept secure through appropriate encryption, secure cloud storage and/or multi-factor authentication, in accordance with the school's information security arrangements. Devices will be kept in locked storage when not in use.

If a victim asks the school not to tell anyone about sexual violence or sexual harassment:

- 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 the 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 child who has caused harm 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 rumors and exposing victims' identities.

The government's Information sharing: advice for practitioners providing safeguarding services (May 2024) 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).

8. TRAINING & INDUCTION

When new staff (including trainee teachers) join our school, they will be informed of the safeguarding arrangements in place. They will be given a copy of (insert school name) policy along with the staff code of conduct and Part One of Keeping Children Safe in Education and told who our Designated Safeguarding Lead (DSL) and Deputy DSLs are. All staff are expected to read these key documents. School leaders and staff who work directly with children will also read Annex A (further information) of Keeping Children Safe in Education.

In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education. To achieve this, we will ensure that:

Every new member of staff or volunteer will receive safeguarding training during their induction period. This programme will ensure they understand the school's safeguarding systems and their responsibilities including information relating to signs and symptoms of abuse, online safety, the Prevent duty, filtering and monitoring, how to manage a disclosure from a child, how to record concerns and the remit of the role of the DSL. The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children.

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 Hillingdon Safeguarding Children Partnership.
- Have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils.

All members of staff will undertake appropriate safeguarding training on an annual basis.

All staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.

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

Volunteers will receive appropriate training, where applicable.

The DSL and any deputies will complete Designated Safeguarding Lead (DSL) training every two years. In addition to formal training, DSL's will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.

We actively encourage all of our staff to keep updated with the most recent local and national safeguarding advice and guidance. School leaders and staff who work directly with children should read Annex A of Keeping Children Safe in Education, which contains important additional information about specific forms of abuse, exploitation and safeguarding issues. Staff should also have regard to guidance accessible from Hillingdon Safeguarding Children Partnership."

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' if an allegation of abuse is made against the Headteacher, they will receive training in managing allegations for this purpose.

EYFS staff are required to attend safeguarding training specifically designed for staff caring for children aged 0–5 which must meet the criteria set out in Annex C to the EYFS Statutory Framework: 'Criteria for effective safeguarding training'. This includes recognising signs of abuse and neglect; responding appropriately to concerns and disclosures; recording and reporting concerns; understanding the setting's safeguarding policies and procedures; and understanding the role of the Designated Safeguarding Lead and relevant safeguarding issues affecting young children.

Schools with EYFS provision must ensure that at least one person who has a current paediatric first aid certificate is on the premises and available at all times when children are present and accompanies children on outings. The certificate must be for a full course consistent with the criteria set out in Annex A to the EYFS Statutory Framework. Paediatric first aid training must be renewed every three years and be relevant for people caring for young children and babies. Staff who are required by the EYFS Statutory Framework to hold a paediatric first aid qualification in order to be included in the required staff:child ratios must obtain the relevant qualification within the timescales specified by the EYFS.

Training must be renewed every two years by [DSL/external provider/LA] and all staff are required to attend. EYFS staff are supported to put their training into practice via

regular updates and reminders from the DSL and inset training sessions, as well as [termly/annual] meetings with their [line manager/Head of Department] which will always include safeguarding as an agenda item.

9. RECOGNISING ABUSE & TAKING ACTION

At the school staff, volunteers, and Governors must follow the procedures set out below in the event of a safeguarding issue arising (references to the DSL include any deputies where applicable).

All staff are encouraged to report and record any worries and concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, worries and concerns accumulate over a period and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on worries and concerns in accordance with this policy to allow the school to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

At times, a child's needs may not be able to be met by universal interventions alone and will best be met through a more targeted response. At this point the child's needs will still be considered as 'emerging' and will therefore be below the threshold for specialist or statutory interventions.

When indicators of needs that fall under this category are identified, the DSL will take responsibility for exploring issues with the child and family, with guidance and support as necessary from Hillingdon Children's Social Care (or the relevant Local Authority where the child resides).

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. Anyone can make a referral. Inform the DSL as soon as possible if you make a referral directly, referrals will be made in line with the London Safeguarding Children Procedures and Hillingdon Safeguarding Procedures.

If a child makes a disclosure to you, you should:

- **Listen carefully to what they are saying.** Be patient and focus on what you are being told. Try not to express your own views and feelings. Allow them time to talk freely and do not ask leading questions.
- **Stay calm and do not show that you are shocked or upset.** If you appear shocked or as you do not believe them, it could make them stop talking and take back what they have said.
- **Let them know they have done the right thing in telling you.** Reassurance can be a big impact. If they have kept the abuse a secret, it can have a big impact knowing they have shared what has happened.
- **Tell them it is not their fault, and they have done the right thing telling you.** Abuse is never a child's fault. It is important they hear and know this.
- **Explain what will happen next and that you will have to pass this information on**. Do not promise to keep it a secret.

- **Document your conversation as soon as possible using the child's own words**. Stick to the facts, and do not make your own judgement on it.
- **If you consider the child to be at risk of harm, tell the DSL or deputy DSL straight away.**
- **Alternatively, if appropriate, make a referral to Children's Social Care and/or the Police directly** and inform the DSL as soon as possible that you have done so.

If you discover that FGM has taken place, or a pupil is at risk of FGM:

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'.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18,** must immediately report this to the Police, personally. This is a 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. The duty for teachers 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 never examine pupils.

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 Hillingdon's FGM guidance.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and record their concerns.

Family Help

A Family Help Assessment is undertaken when it appears a child and family would benefit from coordinated support from more than one agency. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. The assessment should identify what help the child and family need to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The Family Help assessment with consent from the family should be undertaken by a Social worker or Key Worker.

Further information on this is available from Stronger Families Hub.

Making a Referral

Where the DSL deems it appropriate to refer the case to Local Authority Children's Social Care or the Police, they will make the referral or support you to do so. Generally, the consent of parents or carers should be obtained before making a formal referral, unless to do so would place the child at additional risk of harm.

Staff are advised to refer to the Seven Golden Rules of Information Sharing for advice. Where a decision cannot be made in relation to whether to seek consent or not, the DSL should seek advice on the scenario from Hillingdon's Stronger Family Hub (or the

relevant Local Authority where the child resides) without disclosing the identity of the child/family and record the decisions reached.

See Information sharing: advice for practitioners providing safeguarding services (May 2024) for further guidance.

If staff members make a referral directly to Local Authority Children's Social Care, they must tell the DSL as soon as possible.

The Local Authority will decide 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 or there is a disagreement about the threshold outcome from a referral that has been made, the DSL or person who made the referral must follow Hillingdon Escalation Procedures (or the relevant Local Authority where the child resides) to ensure their concerns have been addressed and that the child's situation improves.

Radicalisation / Extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other form of vulnerability. At our school we will ensure that:

- Through training, staff, volunteers and our governing board understand what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact for any concerns relating to radicalisation and extremism.
- The DSL will make referrals to Children's Social Care and will represent our school at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social, and cultural development of pupils.

If a child is not suffering or likely to suffer serious harm, or in immediate danger, staff should speak to the DSL in the first instance to agree a course of action.

If in exceptional circumstances the DSL and any deputies are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from Children's Social Care. Make a referral to Children's Social Care directly if appropriate. Inform the DSL as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide what next steps to take. This could include seeking consent to complete a referral to Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, and the relevant Local Authority Children's Social Care team where the child resides.

London Borough of Hillingdon's Prevent Lead is available for consultation by emailing fgibbs@hillingdon.gov.uk

The Department for Education 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. 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.

Children's 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, exploitation or other adverse childhood experiences.

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 steps in section 9.

Police Attendance in School

Where pupils are requested to be interviewed by the Police, staff should inform the Headteacher and DSL. Staff should be aware of the requirement for children to have an 'Appropriate Adult'.

An 'Appropriate Adult' may include the parent/carer for that pupil or, if the pupil is a 'looked after child', a person representing that Local Authority. It could also include a Social Worker of a Local Authority.

Further information can be found in the Statutory guidance - PACE Code C 2019.

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) staff are expected to report this to the Headteacher.

If you have concerns or become aware of concerns related to the Headteacher, staff should speak to the Chair of Governors.

The Headteacher/ Chair of Governors will then follow the procedures set out in our 'Managing Allegations against Staff' policy and/or our 'Low Level Concerns' Policy.

Allegations of abuse made against other pupils

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

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

We also recognise that some children may direct abusive behaviour towards parents, carers or other family members (sometimes referred to as child-to-parent or caregiver abuse). This may be an indicator of wider safeguarding concerns and should be responded to in line with this policy.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, however, this 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 discriminatory behaviour, including racism, faith-targeted abuse, prejudice-based or discriminatory bullying, or other prejudice-based incidents.
- 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 nude and semi-nude images and/or videos).

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 inform the DSL, but do not investigate it.
- The DSL may contact Stronger Families Hub and follow advice, as well as the Police if the allegation involves a potential criminal offence.
- The DSL will complete a risk assessment and put a support plan in 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.
- The risk assessment will include actions to make the location of any incidents safer, where appropriate.
- The DSL will consider any necessary support or referrals with regards to siblings that may be impacted by identified risk.
- The DSL will contact the children and adolescent mental health services (CAMHS) where appropriate and in line with advice from Children’s Social Care and in accordance with the requirements of child and parental consent.

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, discriminatory or sexualised language or inappropriate behaviour between peers, including racism, faith-targeted abuse, prejudice-based behaviour, and 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 can easily and confidently report abuse.
- Ensure staff reassure victims that they are being taken seriously.
- Ensure staff are trained to understand:

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". 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 another pupil 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 child that has caused the harm, and friends from either side.

The DSL will take the lead role in any decisions regarding the disciplining of the alleged child that has caused the harm(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, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or the relevant 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.

We follow the searching, screening and confiscation in schools guidance in line with our behaviour policy where this activity is deemed necessary and proportionate.

Sharing of nudes and semi-nudes ("sexting")

We will follow the DDMSC/UKIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people when responding to an allegation that nudes and/or semi-nudes have been shared. 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) 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 special educational needs).

- 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.

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 dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

- Pupils also learn the strategies and skills needed to manage:
    - Specific requests or pressure to provide (or forward) such images.
    - The receipt of such images.

The policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

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.
- Pupils can report concerns directly to school staff.

Guidance to support this area can be found within Sharing nudes and semi-nudes: how to respond to an incident (overview) guidance.

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, Microsoft Copilot and Google Gemini.

The 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.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our associated policies.

Our approach is informed by the policy paper, Generative artificial intelligence (AI) in education.

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. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

10. ONLINE SAFETY AND MOBILE PHONES

The school recognises 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 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, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

To meet our aims and address the risks identified 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 are 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 school's approach towards filtering and monitoring on school devices and networks and pupil accessibility to networks via mobile phones, and the risks of online radicalisation.

Parents/Carers will be informed about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures, so Parents/Carers know how to raise concerns about online safety.

Staff are aware of restrictions placed on them with regards to the use of their mobile phone and cameras, for example:

- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.

- Photography or recording is not permitted in toilets, changing areas or other situations involving intimate care. Personal mobile phones, cameras, smart watches or other personal devices capable of taking images or recordings must not be used during nappy changing, toileting or other intimate care.
- Any photography or recording of children will only take place using devices and procedures authorised by the school and in accordance with the school's safeguarding, intimate care and data-protection arrangements.

The school has 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, such systems are reviewed by the governing body.

We will use the Department for Education's Plan technology for your school tool to assess and improve our filtering and monitoring arrangements, and will follow the DfE's guidance Generative AI: product safety expectations. Our filtering and monitoring requirements apply equally to the use of generative AI tools, and we will carry out risk assessments before any such tools are used.

We recognise that pupils with mobiles (including devices with 3G, 4G and 5G connectivity) will have unrestricted access to the internet and understand that pupils may engage in harmful behaviour via this technology during school hours. We recognise this risk could increase the possibility of incidents of child-on-child abuse and bullying, with the sharing of indecent images (consensually or non-consensually), individually or within group chats, and with the potential viewing of pornographic or sexually harmful content in school hours. The school's behaviour policy identifies the procedures surrounding access to technology during the school day.

Ensure 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.

11. HOW PUPILS ARE TAUGHT ABOUT SAFEGUARDING

Pupils will be taught about safeguarding issues through the following:

- Personal, social and health education (PSHE) curriculum.
- Relationship sex education (RSE) curriculum.
- All pupils are notified as to the identity of the DSL and Deputy and how to contact them.
- Pupils are taught how to keep themselves safe online and this is outlined in the E-Safety policy.

We understand that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

Our Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. We focus on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health,

including mental health. We recognise that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

We have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education {AND/OR RSE.}
Our RE/RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers we will use. The school proactively engages and consults parents in the development and review of this policy. [Parents will be informed of their right to request that their child is withdrawn from sex education.]

12. PUPILS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

We recognise that pupils with special educational needs and disabilities (SEND), or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation 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.
- These pupils being more prone to peer group isolation or bullying, including prejudice-based bullying, than other pupils.
- The potential for pupils with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting concerns, including the risk that they do not understand that what is happening to them is abuse.
- The need for intimate care or the possibility that these pupils are isolated from others.
- These pupils being more likely to be dependent on adults for care.
- Difficulties with cognitive understanding, including being unable to distinguish between fact and fiction in online content and then repeating the content or behaviours in school, or not understanding the consequences of doing so.

13. CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING

The fact that a child or young person may be lesbian, gay, bisexual or gender questioning is not, in itself, a safeguarding issue. However, children who identify as lesbian, gay, bisexual or who are questioning their gender may be targeted by other children.

In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender questioning.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It recommended that when parents/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Where a request is made to support any degree of social transition, the school will consider the individual circumstances and the child's best interests, alongside the safeguarding, equality and legal requirements applying to the school. The school will not allow a child to use toilets designated for the opposite biological sex. Where a gender-questioning child does not wish to use the toilets designated for their biological sex, the school will consider whether an appropriate alternative facility can be provided without compromising the safety, comfort, privacy or dignity of the child or other pupils. For pupils aged 11 or over at the start of the school year, the school will not allow a child to undress in front of a child of the opposite biological sex or access changing rooms designated for the opposite sex. Where appropriate, alternative changing or washing arrangements will be considered. Decisions and arrangements will be clearly recorded, appropriately communicated and regularly reviewed.

Risks can be compounded where children lack a trusted adult with whom they can be open. Staff endeavour to reduce the additional barriers these children may face and create a culture in which they feel able to speak to trusted adults and share any concerns.

14. 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 absence from education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

15. Cared for Children and Previously Cared for Children

We will ensure that staff have the skills, knowledge and understanding to keep cared for children and previously cared for children safe. 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 who is responsible for promoting the educational achievement of cared for children and previously cared for children in line with Designated teacher for looked-after and previously looked-after children 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 cared for children and previously cared for children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of cared for children and previously cared for children, including discussing how pupil premium plus funding can be best used to support cared for children and meet the needs identified in their personal education plans.

16. ONLINE LEARNING

Where online learning takes place as part of the school offer, staff are advised to adhere to the following guidance:

- No personal contact information will be shared with parents and carers or students.
- Students will be reminded that they should also be in an appropriate place to take part in the lesson, not in their bedrooms and their clothing should be appropriate.
- The background will need to be blurred, and staff should be in professional dress.

Further guidance for staff can be found here:
Teachers and school staff - UK Safer Internet Centre

17. RECORDS AND INFORMATION SHARING

If staff are concerned about the welfare or safety of any child at our school, they will record their concern using our agreed reporting system. Any worries or concerns should be passed to the DSL without delay.

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. This will include instances where referrals were or were not made to another agency such as Local Authority Children's Social Care or the Prevent program etc.

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 after they have left the school.

When a child leaves our school to move to another school, the DSL will contact the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school within the first 5 days of the start of a new term and within 5 days for an in-year transfer. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.

Where a child protection file is transferred, the school will include a clear, structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs. The summary will distinguish current safeguarding concerns from historic information so that the receiving school can readily understand the child's current circumstances and safeguarding needs.

Where a parent elects to remove their child from the school roll to home educate, we will arrange to transfer any safeguarding concerns to the relevant department within the Local Authority.

Where safeguarding information received from a previous school or college is unclear, incomplete or requires further context, the Designated Safeguarding Lead will seek clarification from the previous setting to ensure that safeguarding decisions are based on a full understanding of the child's needs and circumstances.

18. WORKING WITH PUPILS, PARENTS & CARERS

The school is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When children join the school parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents/carers on request and is available on our website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Social Care.

We are committed to working with parents positively, openly, and honestly. We ensure that all parents/carers are treated with respect, dignity, and courtesy. We respect parents'/carer's rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to safeguard a child from harm.

Where appropriate, the school will work with parents and carers to help them understand the support available to their child and the role that they can play in promoting their child's safety, welfare and educational outcomes.

We will seek to work together with parents to support any worries or concerns we may have about their child unless to do so may place a child at increased risk of harm.

To keep children safe and provide appropriate care for them, the school requires parents/carers to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above) and contact details of a significant adult (a minimum of 3 contacts per child).
- Emergency contact details (if different from above).
- Full details of any other adult authorised by the parent to collect the child (if different from the above).

We will retain this information on file. Information about children will only be shared with adults who have parental responsibility for that child or with those for whom an individual with parental responsibility has given permission, and we have been supplied with the adult's full details in writing.

19. CHILD PROTECTION CONFERENCES

In some circumstances, all professionals involved with a child will be expected to support statutory agencies and provide information relating to the welfare of a child and how to support a child/children and their parent/s or carer/s. One such example is at a child protection conference. There may be circumstances where the school may be asked to participate in Child Protection processes pursuant to the Children Act 1989.

Children's Social Care will convene an Initial Child Protection Conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken

and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk.

Staff members may be asked to attend a Child Protection Conference or Core Group meeting on behalf of the school. Usually, the person representing the school at these meetings will be the DSL. In any event, the person attending will need to have as much relevant, up to date information about the child as possible; any member of staff may be required to contribute to this process.

All reports for Child Protection Conferences will be prepared in advance using the guidance and template report provided by the relevant Local Authority Children's Social Care team. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional, and academic development and the child's presentation at school. To complete such reports, all relevant information will be sought from staff working with the child.

Clearly Child Protection Conferences can be upsetting for parents. We recognise that we may have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Social Care or whose child is subject to a Child Protection plan. Our responsibility is to promote the protection and welfare of all children, and our aim is to achieve this in partnership with our parents.

20. PROFESSIONAL DISAGREEMENT AND ESCALATION OF CONCERNS

When Dealing with Disagreement and Escalation of Concerns, the DSL or other appropriate member of staff will:

- Contact the line manager in Children's Social Care if they consider that the child is not being adequately safeguarded by the child protection plan and follow this up in writing.
- Use the relevant Local Authority Safeguarding Children Partnership Escalation Procedures if this does not resolve the concern. Hillingdon's can be found here.

Professional challenge is an important part of safeguarding practice. Where staff remain concerned that a child is not being adequately safeguarded, they should continue to raise and, where necessary, escalate those concerns in accordance with local safeguarding partnership procedures until they are satisfied that the child's circumstances have been fully considered and appropriate action has been taken.

21. 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.

Visitors are expected to sign in via the visitor's book or electronic system and wear a visitor's badge.

Visitors to the school who are visiting in a professional capacity, such as educational psychologists and school improvement officers, will be asked to show photo ID. The school will be assured that the visitor has had the appropriate DBS check for the activity they are carrying out, or that their employer has confirmed that appropriate checks have been undertaken. The school will not ask to see the DBS certificate in these circumstances. Where a professional visitor will have no contact with children, a DBS check is unlikely to be required.

All other visitors, including visiting speakers, will always be accompanied by a member of staff. 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.

22. USE OF SCHOOL SITE BY EXTERNAL ORGANISATIONS

The school recognises our responsibilities should we receive an allegation relating to an incident that happens when an individual or organisation using our school premises to provide activities or services for children and will adhere to our school safeguarding policies and procedures, including informing the Hillingdon LADO.

We will also ensure that any organisation using our school premises has suitable safeguarding arrangements in place where they provide activities or deliver services to children.

23. SAFER RECRUITMENT

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising
When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
    - If they are known to the police and children's Local Authority social care and
    - If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed
- Ensure that references include factual information about any substantiated safeguarding concerns or allegations that meet the harm threshold. Information about concerns or allegations that are unsubstantiated, unfounded, false or malicious will not be included.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

- Individuals must not be permitted to begin working within provision covered by the EYFS framework until the school has received the applicant's enhanced DBS certificate, including children's barred list information

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a frequent basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid work regularly in a school or college where that work provides an opportunity for contact with children; or
- Carrying out unpaid work involving teaching, training, instructing, caring for or supervising children frequently, including on more than 3 days in any 30-day period, or overnight between 2.00am and 6.00am, regardless of whether they are supervised; or
- Engaging in intimate or personal care or specified healthcare activities that constitute regulated activity, regardless of frequency.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. Where an enhanced DBS check has disclosed information, we will obtain a copy of the certificate from the agency before the person begins work. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the Disqualification under the Childcare Act 2006 statutory guidance.

Volunteers

We will:

- Never leave a volunteer on whom no checks have been obtained unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with children's barred list information for any volunteer who is engaging in regulated activity. This includes a volunteer who teaches, trains, instructs or supervises children frequently, on more than 3 days in any 30-day period, or overnight, regardless of whether they are supervised.
- Recognise that, from 1 September 2026, regulated activity includes volunteers who teach, train, instruct, care for or supervise children on more than 3 days in any 30-day period, or who carry out such activities overnight between 2.00am and 6.00am.
- For any existing volunteer who is now engaging in regulated activity as a result of the removal of the previous supervision exemption, check their children's barred list status and obtain the appropriate enhanced DBS check with children's barred list information.

- Carry out a written risk assessment when deciding whether an enhanced DBS check (without children's barred list information) is appropriate for volunteers who are not undertaking regulated activity. We will retain a record of this risk assessment.
- Ensure all volunteers receive an appropriate induction, safeguarding training and supervision that is proportionate to their role.

- Volunteers aged 16 and over who work directly with children must have an enhanced DBS check including children's barred list information and must not begin volunteering within provision covered by the EYFS framework until the school has received the check. This does not apply to supervised volunteers who only help occasionally, such as parents or carers helping on a trip, provided this is not overnight and does not involve personal care.

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Disqualification under the Childcare Act 2006 statutory guidance. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

We will also obtain written confirmation that the AP will notify us of staff changes that could put the child at risk, keep records of the address of the alternative provision provider and any subcontracted/satellite sites, know where the child is during school hours, and review placements at a minimum of a half-termly basis.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

When organising work experience, we will ensure that appropriate safeguarding arrangements are in place. Where an individual supervising a child on work experience is engaging in regulated activity, we will ensure that the appropriate safer recruitment and vetting checks have been undertaken in accordance with Keeping Children Safe in Education.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

24. SAFER WORKING PRACTICE

All staff or volunteers at the school who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident, and safe to do so.

All staff will be provided with a copy of our policy relating to conduct during induction. They will be expected to know and adhere to our policy on conduct and carry out their duties in accordance with this advice.

If staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. Advice can be found in Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings'. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

25. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children. We do, however, recognise that sometimes allegations of abuse are made.

We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are adults who deliberately seek to harm or abuse children.

We will take all possible steps to safeguard our children and to ensure that the adults in our organisation are safe to work with children. We will always ensure that the procedures outlined by Working Together to Safeguard Children, Part 4 of Keeping Children Safe in Education) and Chapter 7 of the London Safeguarding Children Procedures are adhered to and will seek appropriate advice from the Hillingdon Designated Officer for the Local Authority (LADO). The LADO can be contacted via e-mail: **lado@hillingdon.gov.uk.** A LADO contact form to make a referral or to seek advice and guidance is available here.

If an allegation is made or information is received about any member of staff (or volunteer) who works in our setting who has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- We will also seek consultation with the LADO where we believe that an individual has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to directly relate to a child.

Initial Action by person receiving or identifying an allegation or concern:

- Whilst allegations may be false, malicious or misplaced, they may also be founded in truth; all staff must report allegations even if they reasonably believe them to be false.
- All allegations must be investigated properly, in line with agreed procedures and outcomes recorded.
- Staff must treat all allegations seriously and keep an open mind.
- The evaluation of Low-Level Concerns should be agreed in consultation with the LADO in line with Chapter 7 of the London Safeguarding Children Procedures (see 2.13).
- Make a written record of the information, including the time, date and place of incident/s, persons present and what was said and sign and date this.
- Immediately report the matter to the headteacher/proprietor.
- Do not share allegations with any other member of staff, including the subject of the allegation.
- If the allegation is against the headteacher, staff must report to chair of governors / trustees.
- If there is a lack of faith in the safeguarding governance, all staff can contact the Local Authority's Designated Officers (also known as LADOs) directly, without delay: **LADO@hillingdon.gov.uk**.

The member of staff receiving the information should inform the Headteacher immediately. This includes concerns relating to agency and supply staff, trainee teachers and volunteers.

Where an allegation or concern relates to a trainee teacher placed within the school, the school will remain responsible for gathering the facts and managing the safeguarding process, working closely with the relevant teacher training provider. The training provider will be expected to follow the same procedures as those applying to a supply agency.

A 'case manager' will lead any investigation. This will be the Headteacher, a designated senior manager, or the Chair of Governors where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Should an allegation be made against the Headteacher, this will be reported to the Chair of Governors. In the event that the Chair of Governors is uncontactable on that

day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of the governing body.

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

Any member of staff or volunteer who does not feel confident to raise their concerns within the organisation should contact the LADO directly on the details above.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – this line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

For concerns that are not deemed to meet the harm/risk of harm threshold, we will follow our Low-Level Concerns Procedure below.

27. LOW-LEVEL CONCERNS

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the threshold for 'harm' or 'risk of harm'.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the harm/risk of harm threshold

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns in line with this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

The evaluation of Low-Level Concerns should be agreed in consultation with the LADO in line with Chapter 7 of the London Safeguarding Children Procedures (see 2.13).

Where this consultation results in the matter being considered to meet the harm/risk of harm threshold, this will warrant the Managing Allegations Against Staff and Volunteer procedures above to be followed.

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct.

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025 (collectively referred to as "data protection laws")
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern, to meeting the harm/risk of harm threshold, we will refer it to the LADO
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher, trainee teacher, contractor or another person provided by a third-party organisation, the school will notify the relevant employer, agency or training provider so that any potential patterns of concerning behaviour can be identified and managed appropriately.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the Local Authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

28. LINKS WITH OTHER POLICIES

To underpin the values and ethos of our school and the intent to ensure that children are appropriately safeguarded, this policy links to the following policies and procedures:

- Safer Recruitment Policy
- Behaviour Policy
- Whistleblowing Policy
- IT Acceptable Use Policy
- Anti-bullying Policy
- Code of Conduct
- Complaints Policy
- Attendance Policy
- Health & Safety Policy
- Online Safety
- Managing Allegations Policy
- Relationships and Sex Education Policy
- Equality Policy

29. LOCAL AUTHORITY DETAILS

Stronger Families Hub Single point of referral for Early Help /Family Help and MASH.	Phone: 01895 556006 Mon-Fri, 9am-5.00pm Out of Hours: 01895250111 Mon – Fri 5pm-9am and weekends Email: strongerfamilieshub@hillingdon.gov.uk Refer via: https://portal-ehm.hillingdon.gov.uk/web/portal/pages/ehassess N.B.: If you cannot get through by phone, send an email with your contact details. Our Stronger Families Hub operates 24 hours a day, 7 days a week.
LADO Team Allegations against staff and volunteers (ASV)	Margaret Tomlinson (Interim LADO Manager Email: lado@hillingdon.gov.uk Nicole Diamond (Deputy LADO) Email: lado@hillingdon.gov.uk Please complete this LADO contact form if you wish to make a referral regarding an allegation or if you wish to seek advice and guidance from the LADO. Please find the LADO contact form here.
Education Safeguarding and Wellbeing Officer Safeguarding queries and support for schools.	Amandeep Tamber Email: educationalwellbeing@hillingdon.gov.uk
Virtual School	Phone: 01895 250842 Email: virtualschooladmin@hillingdon.gov.uk Head of Virtual School: Lisa Steel lsteel@hillingdon.gov.uk To get in touch with the Virtual School regarding a child with a social worker, a previously looked after child or a child

	living in a Kinship Care Arrangement please contact us via email at: virtualschoolcwsw@hillingdon.gov.uk
Special Educational Needs and Disabilities Information, Advice and Support Service	Phone: 01895 277001 (Mon-Fri 8:30am- 4:30pm) Email: Home – SENDIASS
Hillingdon Safeguarding Children Partnership Local Safeguarding Partners for children and adults	Phone: 01895 277855 Email: safeguardingpartnership@hillingdon.gov.uk
Prevent Community Safety	Refer via National Prevent referral form Prevent Lead: Fiona Gibbs Mob: 07946714637 Email: fgibbs@hillingdon.gov.uk
Axis Children Services Children at risk or involved in Serious Youth Violence (SYV), Criminal Exploitation (CCE), Child Sexual Exploitation, and Missing from home .	Refer via https://portal-ehm.hillingdon.gov.uk/web/portal/pages/ehassess Email: axis@hillingdon.gov.uk
Youth Offer Children's Social Care	Email: youthoffer@hillingdon.gov.uk Targeted programmes for 8–24-year-olds. Refer via: https://portal-ehm.hillingdon.gov.uk/web/portal/pages/ehassess
Hillingdon Domestic Abuse Advocacy Service (HDAAS)	https://www.hillingdon.gov.uk/article/11408/Hillingdon-Domestic-Abuse-Advocacy-Service-HDAAS Call 07874 620954 or email hdaas@hillingdon.gov.uk
MARAC	Multi-Agency Risk Assessment Conference (MARAC) | Hillingdon Council

Governance Support	Helen Boundy Governance Support Officer Education and SEND Email: hboundy@hillingdon.gov.uk
Private Fostering	Private fostering – Hillingdon Council Refer via: https://portal-ehm.hillingdon.gov.uk/web/portal/pages/ehassess

APPENDIX ONE: TYPES OF ABUSE:

Abuse, a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, such as acts of penetration, whether that is with part of a person's body or an object (for example, rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over 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.

Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting and are more likely to know their abuser than not.

There are specific offences for children under 13, who can never provide valid consent to sexual activity, and specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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 because 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 caregivers)
- Ensure access to appropriate medical care or treatment

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

APPENDIX TWO: FURTHER INFORMATION

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in

conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local Police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child Criminal Exploitation (CCE)

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

- It may involve an exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the facilitator.
- through violence or the threat of violence

The victim may have been criminally exploited even if the child does not view themselves as a victim. CCE does not always involve physical contact; they can also occur using technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (see section below on County Lines), forced to shoplift or pickpocket or to threaten other young people. Victims of CCE can be of any gender. Children and young people are often unwittingly drawn into criminal exploitation through the offer of friendship, relationships and care, gifts, drugs, alcohol, money and accommodation. Some of the following can be indicators of CCE.

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

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; they can also occur using technology. Victims of CSE can be of any gender, under the age of 18, including 16 and 17 years old who can legally consent to have sex. It can include both contact

and non-contact sexual activity and may occur without the child or young person's immediate knowledge. Some of the indicators of CCE can also be indicators of CSE, as can:

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

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. The Department for Education have produced: Child sexual exploitation: definition and guide for practitioners

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Several of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing (from school or home) and are subsequently found in areas away from their home.
- Have been the victim, or individual (alleged or otherwise) who has committed serious violence (e.g., knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters
- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals.

Contextual Safeguarding

Contextual safeguarding means that assessments of children should consider whether wider environmental factors which present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm. We will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care.

Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice provide information on making child arrangements in the event of divorce or separation which can be found here. This may be useful for some parents and carers.

Children Absent from Education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of 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, exploitation 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.

The school recognises the importance of working closely with Children's Social Care where school absence indicates safeguarding concerns.

Where a child has an Education Health & Care Plan Hillingdon (or the Local Authority where the child resides) will review the plan working closely with parents/carers and SEN Department.

Children with a Parent or Carer in Custody

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Cybercrime

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

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider a referral into the Cyber Choices programme. This is a nationwide Police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Domestic Abuse

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional abuse

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help / family help.

The school works in partnership with Police and Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will forward the information securely to the DSL before the child or children arrive at school the following day. On receipt of any such notification, the Headteacher and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due care

and sensitivity. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. This information is managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse | Safelives
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into Local Authority Children's Social Care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible before they are facing a homelessness crisis.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Local Authority Children's Social Care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation.

Mental health

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance, and progress at school. More information can be found in the Mental health and behaviour in schools' guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among children. See School Zone for links to all materials and lesson plans.

Modern Slavery and the National Referral Mechanism

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

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be part of a schools safeguarding approach.

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

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

It is possible to protect people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding

risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210 , which are specifically concerned with schools (and covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available - Channel guidance.

Additional support

The Department has published further advice for those working in education settings with safeguarding responsibilities on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.

- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation.

London Grid for Learning have also produced useful resources on Prevent (Online Safety Resource Centre - London Grid for Learning (lgfl.net).

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, affect their educational attainment and will be exacerbated if the alleged child who has caused the harm(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

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

The likelihood of involvement in serious violence may be increased by factors such as:

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

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 Police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

The Serious Violence Duty requires specified authorities to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the Police and Local Authority Children's Social Care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant 152 Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England) "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or a deputy) and involve Local Authority Children's Social Care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

Further information can be found in the multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance focus on the role of schools and colleges) and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on

forced marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.