

Child Protection & Safeguarding Policy (including safer recruitment, allegations against staff and low-level concerns)

The school has an explicit duty to safeguard and protect children from abuse and harm. The welfare and well-being of a child is paramount.

September 2026

Prepared by: Acting Headteacher

Approved by: FGB

Last Reviewed on July 2026

Next Review due by: September 2027

Important Contacts

Designated Safeguarding Lead: Acting Headteacher - Felicity Sinclair

Deputy Safeguarding Leads:

Acting Deputy Headteacher - Claire Whitney

Interim Deputy Headteacher – Anjna Patel

Reception teacher - Ellie Farquharson

Year 1 leader - Rebecca Maccaw

Designated Safeguarding Governor: Jane Kendall-Nicholas

Chair of Governors: Jane Kendall-Nicholas

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Hounslow Children's Services: Front Door 020 8583 6600 (option 2)

childrensocialcare@hounslow.gov.uk or earlyhelp@hounslow.gov.uk

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NSPCC- 0808 800 5000

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Childline - 0800 1111

<https://www.childline.org.uk>

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023), and the Maintained schools governance guide. Leaders comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- > Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- > The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- > Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- > The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- > Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- > Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- > The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- > Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- > Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- > The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- > The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they're being disproportionately subjected to sexual violence or harassment
- > The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- > The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- > This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

- > Section 3 of the Early Years Foundation Stage (EYFS) Statutory Framework (Statutory Guidance), for children ages 0-5 in school-based nurseries and reception.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

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

Children: This includes everyone under the age of 18.

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

- > Hounslow safeguarding children's partnership (HSCP).
- > A clinical commissioning group for an area within Hounslow.
- > The chief officer of police for the Hounslow area.

Victim: This is a widely understood and recognised term, but leaders 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, leaders will be prepared to use any term that the child involved feels most comfortable with.

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

4. Equality statement

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

We give special consideration to children who:

- > Have special educational needs and/or disabilities (SEND) or health conditions
- > Are young carers
- > May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- > Have English as an additional language (EAL)
- > Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- > Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- > Are asylum seeker

- > Are at risk due to either their own or a family member's mental health needs
- > Are looked after or previously looked after
- > Are missing or absent from education for prolonged periods and/or repeat occasions
- > Whose parent/carers has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

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

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

- > Attendance policy
- > Behaviour including anti bullying policy
- > Equality information and statement
- > Planned programme of Relationships and Health Education (RHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent - including healthy touch
 - Stereotyping, prejudice and equality –including everyone being included in their play.
 - Body confidence and self-esteem - being happy with themselves.

5.1 All staff

All staff will:

- > Read and understand Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, (KCSE) in and will review this guidance at least annually.
- > Sign a declaration online (using iAM Compliant) to say that they have reviewed this guidance at the beginning of each academic year
- > Reinforce the importance of online safety when communicating with parents/carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

All staff will be aware of:

Our systems that support safeguarding, including this child protection and safeguarding policy, behaviour policy, the staff code of conduct and grievance policy, the role and identity name of the designated safeguarding lead (DSL) and deputies, the online safety policy and the safeguarding response to children who go missing in education. The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

- > The process for making referrals to Local Authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- > What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- > The signs of different types of abuse and neglect, as well as, specific safeguarding issues, such as modern slavery, child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE) including (financial exploitation), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence, criminal exploitation (including that linked to county lines)
- > New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation and the role of technology and social media in presenting harm
- > The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- > The fact that children can be at risk of harm inside and outside of their home, at school and online

- > The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- > That a child and their family may be experiencing multiple needs at the same time
- > What to look for to identify children who need help or protection

Staff should also:

- Be prepared to identify children who may benefit from Family Help. Family Help provides support as soon as a problem emerges at any stage of a child's life, from the foundation years through to adolescence.
- Understand that staff should expect to support Children's Social Care and other and other agencies following any referral.
- Be aware of the process for community-based Family Help assessments, including the criteria and thresholds for referral to:
 - > Targeted early help services under Sections 10 and 11 of the Children Act 2004; and
 - > Statutory services under Section 17 of the Children Act 1989 (children in need), including disabled children.
- Understand the criteria and thresholds for referring a child to local authority children's social care for assessment and statutory services under Section 47 of the Children Act 1989, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm
 - Section 31 of the Children Act 1989, relating to care and supervision orders; and
 - Section 20 of the Children Act 1989, relating to the local authority's duty to accommodate a child.
- Understand the school's procedures for responding to concerns relating to the abuse, neglect and exploitation of children, including cases involving disabled children and children managed within the youth secure estate, and know how these concerns should be referred and managed in accordance with local safeguarding procedure

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the strategy team. The DSL is Felicity Sinclair, Acting Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding filtering and monitoring processes on school networks, alongside the IT technician to keep pupils safe online. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture within education and be the most appropriate person to advise on the response to safeguarding concerns. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Staff can also call the DSL's mobile to discuss concerns outside school hours.

When the DSL is unavailable, the deputies: Claire Whitney (Acting Deputy Headteacher), Anjna Patel (Interim Deputy Headteacher), Eleanor Farquharson (Reception class teacher) and Rebecca Maccaw (Year 1 leader) will act as cover.

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

- > Provide advice and support to other staff on child welfare and child protection matters
- > Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- > Contribute to the assessment of children
- > Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- > Have a good understanding of harmful sexual behaviour.

- > Have a good understanding of the filtering and monitoring systems and processes in place at school
- > Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- > Liaise with local authority case managers and designated officers for child protection concerns, as appropriate
- > Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- > Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

5.3 The governing board

The governing board will:

- > Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- > Evaluate and approve this policy annually, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- > Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the school's local multi-agency safeguarding arrangements.
- > Appoint a named governor (Jane Kendall-Nicholas/Chair of governors) to lead and to monitor the effectiveness of this policy in conjunction with the full governing board.
- > Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- > Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 - Reviewing the DfE's filtering and monitoring standards, and discussing with computing technician and service providers, what needs to be done to support the school in meeting these standards.
- > Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- > Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Alongside, the SBM, seek assurance that the other body has the appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

- Make sure that safeguarding requirements are a condition of using the school's premises, and that any agreement to use the premises would be terminated if the other body fails to comply

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

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

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

5.4 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, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL and deputies have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the deputies on this, referring to the log.

Early Years

The school will ensure that:

- All Early Years staff receive safeguarding and child protection training appropriate to their role and understand their responsibilities under the EYFS safeguarding and welfare requirements.
- Appropriate staff-to-child ratios are maintained at all times and children are supervised appropriately to ensure their safety and wellbeing.
- Robust arrangements are in place for safer recruitment, induction, supervision and the ongoing suitability of all adults working with children.
- Clear procedures are followed for recording and reporting safeguarding concerns, including concerns about children's welfare, abuse, neglect or exploitation.
- Information is shared appropriately with parents, carers and relevant agencies in line with statutory guidance and local safeguarding procedures.

In line with the **2026 EYFS** safeguarding updates, the school will also ensure that:

- **Safer sleep** practices are implemented for babies and young children in accordance with the EYFS statutory requirements and current safer sleep guidance.
- Staff have regard to guidance on **children's screen use**, ensuring that technology is used safely, appropriately and in a developmentally suitable way.
- **Safe weaning and eating practices** are followed, including appropriate supervision of children during meals and snacks to reduce the risk of choking and to promote children's health and wellbeing.
- Appropriate arrangements are in place to support children with **medical conditions and allergies**, including ensuring that relevant medical information and essential medication are available. Where concerns about a child's medical needs indicate possible neglect or place a child at risk of harm, these will be managed in accordance with the school's safeguarding procedures.

The school recognises that safeguarding and promoting the welfare of children is paramount and that the EYFS safeguarding and welfare requirements underpin all aspects of Early Years practice.

5.5 Virtual school heads

The school recognises the important role of the Virtual School Head (VSH) in improving educational outcomes for vulnerable children.

Virtual School Heads have a statutory responsibility to promote the educational achievement of children who are looked after and previously looked-after children.

In addition, Virtual School Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children who have a social worker, recognising that attendance is a key safeguarding issue. They also have a non-statutory responsibility to promote the educational achievement of children living in kinship care.

The school will work collaboratively with the Virtual School Head, where appropriate, to promote positive educational outcomes and remove barriers to learning. This includes working with key professionals, such as the Designated Safeguarding Lead (DSL), Special Educational Needs Co-ordinator (SENCO), social workers, attendance leads and mental health leads, to ensure that children receive timely and appropriate support.

Further information can be found in the Department for Education's statutory guidance [Promoting the education of looked-after and previously looked-after children](#).

6. Confidentiality

Strict confidentiality must be maintained at all times. However, safeguarding concerns take precedence over confidentiality where a child's welfare is at risk. Staff must be aware that they have a professional duty to share relevant information with the three safeguarding partners—local authority, health, and police—and with other appropriate agencies, in order to protect a child or young person. Such information should only be shared on a need-to-know basis and in line with statutory guidance.

- Timely information sharing is essential for effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR (general data protection regulations) do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- 'Data protection laws' refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.
- Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals, at risk,' as a processing condition that allows practitioners to share information without consent:
if it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

Concerning older siblings:

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

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- > Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- > Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- > Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or deputies). Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

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

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

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

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

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

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

Anyone can make a referral.

See the front page of this policy, to call the Hounslow social services Front Door and submit a CFAN online.

There are an increasing number of families from Richmond and Surrey.

Make a referral to Surrey which is children's single point of access (C-SPA).

- Call 0300 470 9100 and email: cspa@surrey.gov.uk

Make a referral to Richmond SPA, call 020 8547 5008

- Complete an on-line referral: referrals@achievingforchildren.org.uk

- Staff can report directly to the local council:

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

Tell the DSL, as soon as possible, if you have made a referral directly.

7.2 If a child makes a disclosure to you

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

- > Listen to and believe them. Allow them time to talk freely and **do not ask leading questions**
- > Stay calm and do not show that you are shocked or upset
- > Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- > Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- > Write up your conversation as soon as possible in the child's own words. Stick to the facts and do not put your own judgement on it
- > Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly and tell the DSL, as soon as, possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

See *appendix 4*

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk.

See *appendix 4*

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

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

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

Any other member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.
See appendix 5

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

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

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

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

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

Early help assessment

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

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

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

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

- In Hounslow, a family may be accepted for early help and then remain on a waiting list until they can be supported.
- Early help usually involves a family support worker (FSW) allocated to the family.
- This FSW will liaise with the DSL or deputy lead who is working with the family.
- Early help could include: behaviour support, improving bed time routines, improving attendance, financial or housing support.
- Hounslow also offers 123 magic to support parents with behaviour in the home. This is an online parenting programme.
- The aim of early help is to prevent a family needing social care.

Early Help and Family Help

Any child may benefit from Early Help at any stage in their life. Early Help means providing support as soon as a problem emerges to improve outcomes for children and prevent concerns from escalating.

Under the Working Together to Safeguard Children (2023) reforms, Family Help brings together targeted early help and child in need support to provide families with coordinated, child-centred interventions.

All staff should be prepared to identify children who may benefit from Early Help or Family Help and understand their role in early identification and intervention. Staff should be alert to children whose needs may not meet the threshold for statutory intervention but who would benefit from additional support.

If staff identify concerns about a child's welfare, development or family circumstances, they should discuss these with the Designated Safeguarding Lead (DSL). The DSL will consider whether:

- support can be provided within school;
- an Early Help or Family Help assessment should be undertaken;
- a referral should be made to Family Help services or other appropriate agencies; or
- the threshold has been met for a referral to Children's Social Care.

The school recognises that effective Early Help relies upon timely information sharing and multi-agency working. Staff are expected to work collaboratively with other professionals, contribute to assessments, attend meetings and, where appropriate, act as the Lead Practitioner to coordinate support for a child and their family.

Staff should also be aware of the local criteria and thresholds for:

- Targeted Family Help under Sections 10 and 11 of the Children Act 2004;
- Section 17 of the Children Act 1989 (Children in Need);
- Section 47 of the Children Act 1989, where there is reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm;
- Section 20 of the Children Act 1989 (Duty to Accommodate); and
- Section 31 of the Children Act 1989 (Care and Supervision Orders).

The school will work in partnership with children, families and other agencies to ensure that concerns are identified early, support is coordinated effectively and children receive the right help at the right time.

Referral

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

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

The local authority should make a decision within 1 working days of a referral about what course of action to take and will let the person who made the referral know the outcome.

The DSL or person who made the referral must follow up with the local authority, if this information is not made available, and ensure outcomes are properly recorded.

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

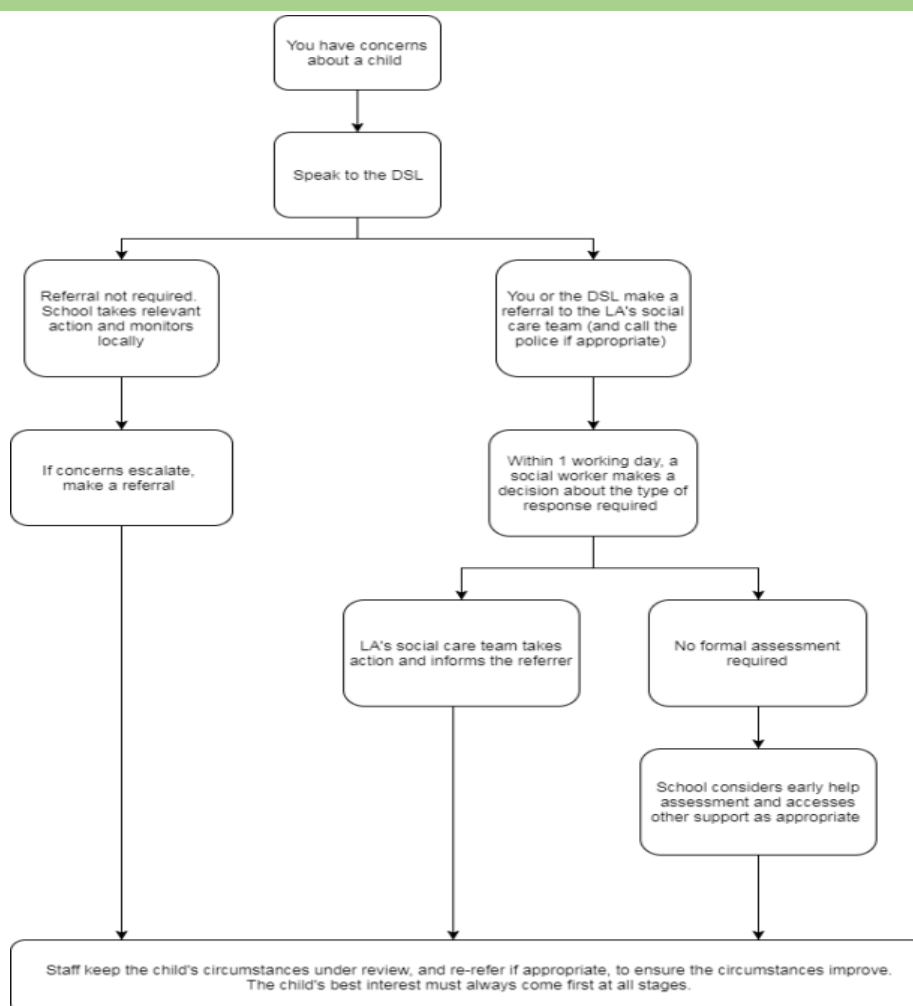
On some occasions, the social care intake team will call the school for additional information.

Working Together for Child Protection

In Hounslow, there is a hub where professionals work together for child protection.

There are representatives from health, education, police and social care at the hub. There will be emergency planning meetings with these professionals, if a concern is deemed to be serious. From this emergency planning meeting, professionals will decide in future action. This may include a child being removed from the home.

In addition, all professionals and agencies are invited to attend all meetings with parents/carers. There is a named contact for issues concerning the prevent strategy and FGM. Social care also regularly contacts the school for a review which is called a welfare check. This will be part of their multi-agency assessment which will inform their decision from a referral from any agency.



Involving older siblings:

7.5 If staff have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay staff taking appropriate action being taken.

Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

Or Hounslow's Prevent team:

- Call Joan Conlon 078 1707 9190
joan.conlon@hounslow.gov.uk
- Or call Najeeb Ahmed 078 9054 0433
Najeeb.Ahmed@hounslow.gov.uk

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. Staff 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.

7.6 If you have a concern about mental health

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. This may involve a referral to: school nurse or child and adolescent mental health services (CAMH)s. Parents/carers may be advised to see their GPs who can also support with mental health concerns. There is further guidance from the department for education (DFE) [mental health and behaviour in schools](#) for more information.

Child's mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff should remain alert to behavioural signs and other indicators that suggest a child may be experiencing poor mental health or may be at risk of developing mental health difficulties.

Mental health concerns may include, but are not limited to, persistent low mood, anxiety, withdrawal, changes in behaviour, eating disorders, self-harm, suicidal thoughts or behaviours, or other significant emotional distress. These concerns should be considered alongside the child's wider circumstances and should not be viewed in isolation.

If staff have a mental health concern about a child that is also a safeguarding concern, they must take immediate action by following the safeguarding procedures set out in section 7.4 and reporting the concern to the Designated Safeguarding Lead (DSL) without delay.

If the mental health concern is not a safeguarding concern, staff should discuss the matter with the DSL to agree an appropriate course of action. This may include providing pastoral support within school, engaging with parents or carers, seeking advice from the school nursing service, referring to Child and Adolescent Mental Health Services (CAMHS) or other appropriate support services, or advising parents or carers to seek support from their GP.

All staff should recognise that mental health concerns can escalate and may develop into safeguarding concerns. Particular attention should be given to children who present with self-harm, suicidal ideation or behaviours that indicate a risk of suicide. Any concerns about a child's immediate safety must be acted upon without delay.

If staff believe that a child is at immediate risk of serious harm, they should contact the emergency services by calling 999 or ensure that the child is taken immediately to the nearest Accident and Emergency (A&E) Department by a parent, carer or another appropriate adult. If a child requires urgent mental health support but the situation is not life-threatening, staff should seek advice via NHS 111 by calling 111 or using the NHS 111 online service and selecting the mental health option.

Further guidance is available in the department for education's guidance. (DFE) [mental health and behaviour in schools](#) for more information.

7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher, as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

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

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

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

In early years

- Where appropriate, the EYFS leader will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

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

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under the school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

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

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

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

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

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

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

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

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

To achieve this, we will:

- > Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- > Be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence

(hazing refers to any activity expected of someone in joining or participating in a group that humiliates, degrades, abuses, or endangers them) with respect to boys.

- > Ensure the curriculum helps to educate pupils about appropriate behaviour and consent.
- > Ensure pupils are able to easily and confidently report abuse using school's reporting systems.
- > Ensure staff reassure victims that they are being taken seriously.
- > Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- > Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all they can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- > Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- > Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report.

For example:

- Children can show signs or act in ways they hope adults will notice and react to.
- A friend may make a report.
- A member of staff may overhear a conversation.
- A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police.

The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent school from coming to its own conclusion about what happened and imposing a penalty accordingly.

We will consider these matters on a case-by-case basis, taking into account whether:

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

For Elder siblings:

7.9 Sharing of nudes and semi-nudes ('sexting')

Nudes and semi-nudes, including where generated by AI, the term 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

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

Your responsibilities when responding to an incident

If staff 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'), they must report it to the DSL immediately.

Staff must **not**:

- View, copy, print, share, store or save the imagery themselves, or ask a pupil to share or download it (if staff have already viewed the imagery by accident, they 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.
- Staff should explain that they need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom exploit a child or young person, the incident may first present as a child-on-child incident (see appendix 4)
- 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 in line with the procedures set out in this policy.

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the local community officer.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record keeping arrangements are set out in section 14 of this policy.

8. Online safety and the use of mobile technology

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

To address this, school aims to:

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

The 4 key categories of risk

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

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

To meet school's aims and address the risks above we will:

- > Educate pupils about online safety, as part of the PSHE including RHE curriculum and the Computing 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 and the risks of online radicalisation. All staff members will receive refresher training each academic year.
- > Educate parents/carers about online safety via school's website or communications sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- > Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras. For example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use, to non-contact time when pupils are not present.
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- > Make sure all pupil, parent/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- > Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- > Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- > Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- > Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- > Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

For full details about our school's online safety procedures including early years, please refer to our online safety policy.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Further information can be found on this can be found on [Generative artificial intelligence](#). Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Feltham Hill 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.

Feltham Hill will treat any use of AI to access harmful content or bully pupils in line with this policy and school's behaviour including anti-bullying policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Notifying parents/carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information is provided about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure school's approach to information sharing is consistent.

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

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

10. Pupils with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours, such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- These children are more likely to be dependent on adults for care
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

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

- > additional enrichment activities
- > PSHE and PSED support, including working with support staff.
- > Leaders also help pupils overcome any communication barriers they face.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Safeguarding pupils with medical conditions:

The school recognises that children with medical conditions and allergies may be more vulnerable if their health needs are not appropriately supported. Staff should remain alert to situations where concerns relating to a child's medical condition may indicate a wider safeguarding issue.

An incident involving the management of a child's medical condition or allergy would not, in itself, normally require a safeguarding referral. However, where concerns arise that a child may be at increased risk of neglect, abuse or exploitation because of their medical condition, appropriate safeguarding procedures will be followed.

Examples may include repeated occasions where essential medication is not provided, relevant medical information is withheld from the school, or a child's health needs are consistently not being met, placing them at risk of harm. In such circumstances, staff must report their concerns to the Designated Safeguarding Lead (DSL), who will consider the appropriate course of action, including whether a referral to Children's Social Care is required.

The school will manage pupils' medical conditions and allergies in accordance with the Department for Education's statutory guidance [Supporting Pupils at School with Medical Conditions](#) and [Allergy Safety in Schools](#), alongside this Child Protection and Safeguarding Policy.

Safeguarding all pupils (social transitioning)

The school recognises its statutory duty to safeguard and promote the welfare of all children. Where a child is questioning their gender, the school will consider how best to fulfil this duty by ensuring that any decisions made are in the best interests of the child while also taking account of the welfare and rights of other children who may be affected.

Requests for support relating to social transition will be considered on an individual basis. The school will take a careful, evidence-informed approach, recognising that social transition is an active intervention and that decisions should be made with appropriate consideration of the child's overall wellbeing, safeguarding needs and any relevant professional advice.

In the vast majority of cases, the school will work closely with parents or carers, recognising their primary role in decisions affecting their child. Parents or carers will normally be involved at the earliest opportunity. However, where involving parents or carers may place the child at increased risk of harm, the Designated Safeguarding Lead (DSL) will determine the most appropriate safeguarding response before any contact is made.

When considering a request for support, the school may seek advice from relevant professionals, including the DSL, the Special Educational Needs Co-ordinator (SENCO), health professionals and other agencies, as appropriate. Consideration will also be given to any wider safeguarding concerns, the child's health, neurodiversity and individual needs.

If a child shares concerns or questions about their gender identity with a member of staff but does not request changes to how they are treated at school, staff will respect the child's confidentiality unless there is a safeguarding concern or a legal reason to share the information. Any safeguarding concerns arising from these discussions will be managed in accordance with this policy.

The school recognises that primary-aged children require particular safeguarding consideration and will ensure that any decisions are made cautiously, proportionately and in line with current statutory guidance. Staff will not make decisions requiring clinical expertise and will seek appropriate advice where necessary.

11. Pupils with a social worker

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

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

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

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

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, they 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, Felicity Sinclair, Acting Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

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

13.2 Other complaints

Other safeguarding-related complaints will be addressed by the Headteacher/DSL. These may be in relation to pupils or the school premises. We also take into account requirements related to complaints, set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

13.3 Whistle-blowing

Please refer to the school's whistle-blowing policy for concerns regarding the way the school safeguards pupils including poor or unsafe practice, or potential failures.

Staff are expected to whistle blow.

14. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded on school's online reporting system, Myconcern. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken decisions reached and the outcome

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

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

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

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

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

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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

In addition:

Appendix 2

Sets out school's policy on record-keeping specifically with respect to recruitment and pre-employment checks.

Appendix 3

Sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

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

This training will be regularly updated and will:

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

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

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

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

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and deputies

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

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

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

15.3 Governors

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as, providing strategic challenge.

- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

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

15.4 Recruitment – interview panels

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

See appendix 2

15.5 Staff who have contact with pupils and families

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

16. Monitoring arrangements

This policy will be reviewed **annually** by a Senior Leader. At every review, it will be approved by the full governing board.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour including anti-bullying
- Staff code of conduct and grievance procedures
- Attendance
- Complaints
- Health and safety
- Online safety
- Equality
- PSHE and RHE
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistleblowing

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

Appendix 1: types of abuse

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 the ill treatment of others. This is particularly relevant 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, 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 one or more adults or by another child or children.

Children may also cause harm to family members, including through child-to-parent or child-to-carer abuse. This may include physical violence, verbal or emotional abuse, coercive or controlling behaviour, damage to property, financial abuse or other forms of harmful behaviour. Such incidents should be recognised as safeguarding concerns, and staff should respond in line with this policy and local safeguarding procedures.

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: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Emotional abuse may involve conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

Emotional abuse may also include verbal abuse, such as persistent criticism, belittling, humiliation, intimidation, threats or name-calling. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape, oral sex or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

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

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

Appendix 2: Safer Recruitment and DBS Checks – policy and procedures

Safer Recruitment Policy

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

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 the 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:

- 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 leaders 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 will 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 carry 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 the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references school 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.

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

As an infant & nursery school, 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 regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- > Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- > Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances leaders will carry out all the relevant checks on existing staff, as if the individual was a new member of staff.

These circumstances are where:

- 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 as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026.
- 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. 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 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.

As an Infant & Nursery school, for self-employed contractors such as 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 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

As an Infant & Nursery school, 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.

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.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low level concerns) policy

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult the local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. If we receive an allegation of an incident happening while an individual or organisation was using school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Hounslow local authority.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.
(The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action, as soon as, possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place.
Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, the DSL/Headteacher will make a risk assessment of the situation. If necessary, the DSL will may make a referral to children's social care, as appropriate

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer.

- The record will include information about the alternatives to suspension that have been considered, and why they were rejected.
Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. They can turn to for advice from a trade union representative, or a colleague, or friend.
- Inform the parents or carers of the child/children involved about the allegation, as soon as, possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child, no information will be shared regarding the staff member).

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

In early years:

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

And for the rest of the school:

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, volunteers or contracted staff member provided by an agency, leaders will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

The school will fully co-operate with any enquiries undertaken by the Local Authority Designated Officer (LADO), the police and/or Children's Social Care. All agencies involved will be provided with the information required to support a timely and effective investigation.

The school will normally take the lead in managing allegations or concerns about adults working with children, including gathering relevant information, liaising with the LADO and other agencies, and ensuring that appropriate action is taken. This is because the school has direct access to staff, pupils and relevant records and is best placed to establish the facts at the earliest opportunity and provide the information required to inform decision-making.

All allegations and low-level concerns will be managed in accordance with the school's procedures, statutory guidance and local safeguarding partnership arrangements.

Timescales

We will deal with all allegations, as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps.
If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps.
If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file)

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer, to determine whether there are any improvements, that school can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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 as per section 7.7 of 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

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 staff code of conduct and grievance procedures policy. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate the deputy headteacher/deputy safeguarding lead.

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. 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 DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
Where a pattern of such behaviour is identified, school 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 harms threshold as described in section 1 of this appendix, leaders will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

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.

Appendix 4: Specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, and Hounslow safeguarding procedures.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account

- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues.

This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may 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 school's procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

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

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

A child may be criminally exploited even if the activity appears to be consensual. CCE does not always involve physical contact and can take place both online and offline. Examples include children being forced or coerced to work in cannabis factories, transport drugs or money (including through county lines activity), commit theft, shoplifting or pickpocketing, carry weapons, threaten or assault others, commit fraud or cybercrime, or undertake other criminal acts for the benefit of others.

Children who are criminally exploited should have their vulnerabilities recognised by all adults and professionals, particularly older children who may be less readily identified as victims. It is not possible for a child to consent to their own exploitation, abuse or trafficking, and many children may not recognise that they are being exploited.

As with Child Sexual Exploitation (CSE), victims of CCE are not always recognised and may be criminalised for offences they have been compelled to commit while under coercion or control. This remains a significant safeguarding concern, as professionals continue to encounter children who have been manipulated, groomed and exploited without fully understanding the abuse they are experiencing. Children who are victims of criminal exploitation should always be treated primarily as victims in need of safeguarding and protection.

Indicators of CCE can include unexplained money, gifts or possessions, changes in behaviour or peer groups, repeated missing episodes, increased use of mobile phones or multiple devices, carrying weapons, unexplained injuries, involvement with gangs or older individuals, frequent travel to unfamiliar locations, or declining attendance and engagement at school. These indicators should be considered alongside the child's individual circumstances and do not, in isolation, confirm that exploitation is taking place.

Any concerns that a child may be at risk of, or experiencing, criminal exploitation will be treated as a safeguarding concern and responded to promptly in line with this policy, local safeguarding procedures and statutory guidance.

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator.

It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

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

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is any form of abuse where children abuse other children. This can occur inside and outside of school, online or offline, and may take place both face-to-face and online simultaneously.

We recognise that child-on-child abuse can happen in any setting and that even if there are no reports, this does not mean that it is not taking place. We are committed to creating a culture where all children feel safe to report concerns and where reports are taken seriously, investigated appropriately and responded to promptly.

The school will remain alert to the times and locations where children may be at increased risk of child-on-child abuse, including during unstructured times such as breaktimes, lunchtimes, immediately before and after the school day, on school transport, during educational visits, extracurricular activities and in online spaces associated with the school.

All concerns of child-on-child abuse will be taken seriously and dealt with on a case-by-case basis. Victims, alleged perpetrators and any other children affected will be supported appropriately, and the school will work with parents, carers and external agencies where necessary to safeguard all children involved.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. As well as knowing how to respond to concerns, all staff should understand that child-on-child abuse is preventable. Staff should be able to recognise behaviours and indicators of risk at an early stage and understand that timely, evidence-based intervention and support can be key to preventing children from going on to engage in abusive or violent behaviour. Staff should always challenge inappropriate behaviours, intervene early where concerns arise and work with the Designated Safeguarding Lead (DSL) to ensure that both victims and those displaying harmful behaviours receive appropriate support and intervention.

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

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

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

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

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

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

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

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

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

Homelessness

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

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

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

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

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

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM.
 - Having limited level of integration within UK society.
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
 - Talking about FGM in conversation for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
 - Being unexpectedly absent from school.
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

Forced marriage

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmua@fco.gov.uk.
- Refer the pupil to an education welfare officer.

Preventing radicalisation

➤ **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence

➤ **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

➤ **Terrorism** is an action that:

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the online safety policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern. Schools play a key role in protecting children from violence, safeguarding victims and identifying those who may be at risk of, or involved in, serious violence. Staff should be alert to the signs that a child may be at risk of, or involved in, serious violent crime and understand that some children involved in violence may also be victims of abuse, neglect or criminal exploitation.

Indicators that a child may be at risk from, or involved in, serious violence include:

- * Increased absence from school.
- * A change in friendships or relationships with older individuals or groups.
- * A significant decline in educational performance or engagement.
- * Signs of self-harm or a significant deterioration in emotional wellbeing.
- * Signs of assault or unexplained injuries.
- * Unexplained gifts, money or new possessions, which may indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of child criminal exploitation.

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

- * Being male.
- * Frequent absence from school, suspension, permanent exclusion or disrupted education, including time spent in alternative provision.
- * Having experienced abuse, neglect or other forms of child maltreatment.
- * Previous involvement in offending, such as theft or robbery.
- * Association with gangs, criminal networks or peers involved in violence.

Staff should remain particularly vigilant during periods when children may be at increased risk, including immediately before and after the school day, during journeys to and from school, and at other unstructured times.

Any concerns that a child may be involved in, or at risk of, serious violence must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL. This includes concerns that a child may be carrying, using or threatening to use a weapon.

The DSL will assess the level of risk to the child and to others within the school, taking account of all available information and any wider safeguarding concerns. Where appropriate, the DSL will develop a safety and support plan, consider strategies to de-escalate peer conflict, and work with parents, carers and relevant external agencies to reduce the risk of harm.

Early, evidence-informed intervention is essential. Children identified as being at risk should receive timely support, which may include access to a trusted adult, social and emotional support, mentoring, therapeutic services, Family Help, or other targeted interventions. Where appropriate, referrals will be made to Children's Social Care, the police or other specialist services in accordance with local safeguarding procedures.

Further guidance on indicators, risk factors and protective actions relating to serious violence is available in Annex A of Keeping Children Safe in Education (2026) and through the Youth Endowment Fund (YEF), which provides evidence-based guidance on preventing violence.

Checking the identity and suitability of visitors

The office staff are responsible for checking visitors.

All visitors will be required to verify their identity to the satisfaction of SBM. Visitors are expected to sign the online register and wear a visitor's lanyard. The colour of the lanyard will determine if we have a DBS or not. A red lanyard shows no DBS check. Yellow lanyard shows that the SBM has checked the DBS.

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

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

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. Leaders 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.

Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

Non-collection of children

If a child is not collected at the end of the day, leaders will:

- Ensure the office staff have called all of the emergency contact numbers on the admission form.
- Email parents and their contacts too.
- And send a parent mail, if still no answer.
- The headteacher or deputy may call the police if a child isn't collected by 4.30.
- The DSL also may submit a referral to social care.

Missing pupils

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

If a child goes missing:

- After day 3 of no contact, the receptionist/attendance officer will submit a child missing in education (CME) form to the SASSO.
- The SASSO will then try and contact the family and keep school informed.
- This SASSO will encourage the parents to bring their child back to school, once they have made contact.

Appendix 5: Triage Procedures for Myconcern and Social Care Referrals

1. Initial Review of Concern

- **Responsibility:** Designated Safeguarding Lead (DSL) or Deputy DSL
- **Timeframe:** Within 24 hours of submission (same day if serious)
- **Actions:**
 - Read the concern fully, including attachments or linked chronology.
 - Assess the **clarity, severity, frequency**, and **context**.
 - Cross-reference with any **prior concerns or patterns** on the child's profile.

2. Risk Assessment Questions

- Is the child **at immediate risk of harm**? (e.g. physical abuse, sexual abuse, suicidal ideation, severe neglect)
- Is this a **one-off** or part of a pattern?
- Has the child **disclosed** something directly?
- Are there **wider vulnerabilities** (e.g. SEND, previous CP concerns, known family difficulties)?
- Have **previous interventions** (e.g. ELSA, pastoral, family support) failed?
- Is there **evidence of criminal behaviour** or exploitation (e.g. CCE, CSE, FGM, radicalisation)?

3. Decide on Immediate Action - Three main triage outcomes:

Level of Need	Action	Timescale
Level 4: Immediate Danger Significant Harm	Call 999 and/or Children's Social Care . Do not wait. Inform parents after referral (unless this places child at greater risk).	Immediately
Level 3: Complex Needs/ Emerging Risk	Call the Front door – 0208 583 6600 <i>Option 2</i> then <i>Option 2</i> and discuss your concerns. Refer to Children's Social Care earlyhelp.hounslow.gov.uk/web/portal/pages/home Gain consent from parent/carer unless it places child at risk. Out of hours number: 0208 583 2222	Within 24 hours
Level 2: Early Help Need	Refer to Early Help earlyhelp.hounslow.gov.uk/web/portal/pages/home Gain consent from parent/carer.	Within 48 hours
Level 1: School Support	Monitor, record, involve pastoral/ELSA. No referral to CSC needed. Log all actions.	Ongoing

4. Record Keeping

- All triage decisions must be:
 - Logged in *MyConcern*.
 - Include rationale for referral or no-referral.
- Attach relevant documents to the files area (emails, Early Help Forms, body maps, etc.)

5. Threshold Tools to Support Decision

Use Hounslow's Threshold Guidance and Assessment Protocol.
www.hscb.org.uk/professionals/early-help-and-referral/

www.londonsafeguardingchildrenprocedures.co.uk/thresholds.html

6. Parent/Carer Involvement

- Always seek consent for referrals **unless**:
 - It places the child at increased risk
 - It might interfere with a police/social care investigation
- Log attempts to gain consent and reasons if not gained on Myconcern.

7. Follow-Up

- If a referral is made:
 - Ensure receipt is acknowledged by CSC.
 - Follow up if no response within 48 hours.
 - Record outcomes on *MyConcern* and update staff on a need-to-know basis
 - Check outcome by emailing: childrensocialcare@hounslow.sch.uk
- If no referral is made:
 - Set review date.
 - Consider further monitoring, pastoral check-ins, or Early Help.

8. Escalation Procedure

- If concerns are dismissed by CSC and you disagree:
 - Use the **escalation process** outlined in your local safeguarding partnership protocol.
 - Record all steps and notify DSL.

July 2026