



## OAK LODGE SCHOOL and Phoenix House

### Safeguarding Policy and Procedure

This policy was adopted by the Governing Body on 8<sup>th</sup> December 2022

This policy is due for review by 31<sup>st</sup> August 2023

 **Oak Lodge School** Safeguarding Team 2022-2023 

 <b>Karen Duggan-Stevens</b> <u>Designated Safeguarding Lead</u> SENCO/Designated Teacher/Assistant Head	 <b>Caroline Rowlandson</b> Headteacher Overarching whole school Safeguarding	 <b>Jess Doyle</b> Senior Safeguarding Deputy/ Wellbeing Coordinator/Designated Mental Health Lead
 <b>Christine Mukasa</b> Assistant Head / Safeguarding Deputy	 <b>Elizabeth Quinn</b> Phoenix House Head of Care / Safeguarding Deputy	 <b>Saul Allison</b> Phoenix House Senior Residential Worker/ Safeguarding Deputy

### Safeguarding Governors

 <b>Stephen Cave</b> Safeguarding Governor scave@oaklodge.wandsworth.sch.uk	 <b>Melody Fowler-Wright</b> Whistleblowing Governor mfowlerw@oaklodge.wandsworth.sch.uk
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If the DSL or Deputies are not available you must see the **Headteacher** who will help you decide what to do next.

If you believe there is an immediate need for a safeguarding response, or want to access whether a safeguarding referral is appropriate, call Wandsworth Initial Point of Contact (IPOC).

Call 0208 871 6622 (9am – 5pm) Out of hours: 0208 871 6000 or email [ipoc@wandsworth.cjm.net](mailto:ipoc@wandsworth.cjm.net) which is a secure email address. If the child does not live in Wandsworth please speak with the DSL for further guidance.

**Key Contacts:**

<b>Role:</b>	<b>Name / Details:</b>	<b>Contact:</b>
Head Teacher	Caroline Rowlandson	<a href="mailto:crowlandson@oaklodge.wandsworth.sch.uk">crowlandson@oaklodge.wandsworth.sch.uk</a>
Designated Safeguarding Lead (s)	Karen Duggan-Stevens	<a href="mailto:kdugganstevens@oaklodge.wandsworth.sch.uk">kdugganstevens@oaklodge.wandsworth.sch.uk</a>
Deputy Designated Safeguarding Lead (s)	Jess Doyle	<a href="mailto:jdoyle@oaklodge.wandsworth.sch.uk">jdoyle@oaklodge.wandsworth.sch.uk</a>
Phoneix House Head of Care /Safeguarding Deputy	Elizabeth Quinn	<a href="mailto:equinn@oaklodge.wandsworth.sch.uk">equinn@oaklodge.wandsworth.sch.uk</a>
Nominated Governor for Safeguarding / Child Protection	Melody Fowler-Wright	<a href="mailto:mfowlerwright@oaklodge.wandsworth.sch.uk">mfowlerwright@oaklodge.wandsworth.sch.uk</a>
Chair of Governors	Stephen Cave	
Head of Advice, Support and Help (ASH) incl MASH, Brief Intervention, Social Workers in	Iain Low	<a href="mailto:Iain.Low@richmondandwandsworth.gov.uk">Iain.Low@richmondandwandsworth.gov.uk</a>
Multi Agency Safeguarding Hub (MASH) Weekdays 9am – 5pm		<a href="mailto:mash@wandsworth.gov.uk">mash@wandsworth.gov.uk</a> 020 8871 6622
Out of Hours (OOH) Service, evenings, weekends, and bank holidays		020 8871 6000
Multi Agency Referral Form (MARF)		<a href="https://wandsworth-self.achieveservice.com/service/Make_a_Referral_to_the_Wandsworth_MASH">https://wandsworth-self.achieveservice.com/service/Make_a_Referral_to_the_Wandsworth_MASH</a>
Wandsworth Safeguarding Children Partnership		<a href="http://www.wscp.org.uk">www.wscp.org.uk</a> 020 8871 7401
Head of Service Safeguarding Standards Childrens Services	Ruth Lacey	Ruth.Lacey@richmondandwandsworth.gov.uk

Interim Safeguarding Standards Service Manager	Rachel Greene	Rachel.Greene@richmondandwandsworth.gov.uk
LADO: Local Authority Designated Officer	Anita Gibbons	Anita.Gibbons@richmondandwandsworth.gov.uk lado@wandsworth.gov.uk
Education Safeguarding Officer		Vacant
Early Education and Childcare Places Service Lead	Matt Hutt	Matt.Hutt@richmondandwandsworth.gov.uk
Outreach & Provider Support Lead- Early Education	Liz Hickson	Liz.Hickson@richmondandwandsworth.gov.uk
Social Workers in Schools - Team Manager	Joanne Loveless	Joanne.Loveless@richmondandwandsworth.gov.uk
Wandsworth Family Information Service (FIS)		<a href="https://www.wandsworth.gov.uk/fis">https://www.wandsworth.gov.uk/fis</a>
Virtual School Education Co- Ordinator	Rachel Wright	Rachel.Wright@richmondandwandsworth.gov.uk
Police Sergeant: Safer Schools Officer	Amreek Singh	Amreek.Singh@met.police.uk <i>(only applicable to secondary schools)</i>  07788 36 0196
Safer Schools Officer		<i>[Insert name and contact to be entered by each school if appropriate (only applicable to secondary schools)]</i>
Police		999 for emergencies and 101 for non-emergencies
Crimestoppers free phone		0800 555 111 [information may be passed anonymously]
School Nurse	Alison Madert	<a href="mailto:amadert@nhs.net">amadert@nhs.net</a>
School Improvement Manager	Ann Debono	<a href="mailto:Ann.Debono@richmondandwandsworth.gov.uk">Ann.Debono@richmondandwandsworth.gov.uk</a>

Link Advisor		<i>[Insert name and contact to be entered by each school if appropriate]</i>
Head of School Support Services and Traded Service	Gary Hipple	Gary.Hipple@richmondandwandsworth.gov.uk
School Support and Contracts Manager	Lewis Brunton	Lewis.Brunton@richmondandwandsworth.gov.uk
Vulnerabilities Manager Channel Chairperson	Miranda Hibbert	<a href="mailto:Miranda.Hibbert@richmondandwandsworth.gov.uk">Miranda.Hibbert@richmondandwandsworth.gov.uk</a>
VAWG Manager	Albina Hiorns	<a href="mailto:Albina.Hiorns@richmondandwandsworth.gov.uk">Albina.Hiorns@richmondandwandsworth.gov.uk</a>
Hate Crime and Prevent Coordinator	Naheem Bashir	Naheem.Bashir@richmondandwandsworth.gov.uk
Training and Development Officer - Safeguarding (Schools)	Mary Scarlett	Mary.Scarlett@richmondandwandsworth.gov.uk
Children Missing in Education	Elizabeth Eyoma	Elizabeth.Eyoma@richmondandwandsworth.gov.uk
Private Fostering	Nateicha McGann	Nateicha.McGann@richmondandwandsworth.gov.uk
Elective Home Education	Biddy Macintyre	Biddy.Macintyre@richmondandwandsworth.gov.uk
TPD	Training & Professional Development Online	<a href="https://www.tpd.org.uk/">https://www.tpd.org.uk/</a> <a href="https://www.tpd.org.uk/cpd/portal.asp">https://www.tpd.org.uk/cpd/portal.asp</a>
DFE Helpline	DFE	For non-emergency advice: contact DfE dedicated helpline
Report suspected extremism online		<a href="https://www.gov.uk/report-suspicious-activity-to-mi5">https://www.gov.uk/report-suspicious-activity-to-mi5</a>
Report terrorist activity online		<a href="https://www.gov.uk/report-terrorism">https://www.gov.uk/report-terrorism</a>
NSPCC	NSPCC	<u><a href="#">Reporting child abuse and neglect   NSPCC</a></u> : online reporting 24 hours day 0808 800 5000 (Telephone: Monday to Friday 8am – 10pm or

<p>Female Genital Mutilation FGM</p>	<p>Police</p>	<p><a href="http://www.gov.uk/contact-police">www.gov.uk/contact-police</a> Metropolitan Police Service Project Azure Partnership Team: 020 7161 2888 NSPCC FGM free phone helpline: 0800 028</p>
<p>Whistleblowing</p>		<p>NSPCC helpline: 0800 028 0285 (8am-8pm Mon-Fri) <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<p>Homelessness</p>		<p>Housing Wandsworth Local Authority <a href="https://www.wandsworth.gov.uk/housing/">https://www.wandsworth.gov.uk/housing/</a></p>

**School Record of Safeguarding Training:**

<b>Type of Training:</b>	<b>Date completed:</b>	<b>Next due date:</b>
Whole School Safeguarding Training (Due every 2 years)		
Senior Designated Safeguarding Lead (DSL) (Due every 2 years)	12.01.2022	19.01.2022
Deputy Senior DSL (Due every 2 years)	26.08.2022  Designated Safeguarding Lead Re-fresher	08.2024
Whole School Staff Refresher/updates (Annual)	02.11.22 (Staff INSET)	09.2023
Safer Recruitment Training (Due every 2 years)	January 2022	January 2024
Governor Training		
Annual DSL Prevent Training Update (for DSLs to disseminate to ALL staff)	October 2021	January 2023

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# Safeguarding Policy:

## 1. INTRODUCTION:

- 1.1 It is essential that **everybody** working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play ensuring children and young people are safe from abuse, neglect exploitation and harm. Our school is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the child.
- 1.2 Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is likely. [Home - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](http://www.wscp.org.uk)
- 1.3 Our school is a community and all those directly connected, staff members, governors, parents, families, and pupils, have an essential role to play in making it safe and secure for all.
- 1.4 This procedure document provides the basis for good practice within the school for Safeguarding work. It should be read in conjunction with the Wandsworth Safeguarding Childrens Partnership' safeguarding Policies and Procedures ([Policies and procedures - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](http://www.wscp.org.uk)). All documents are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.

## 2 OUR ETHOS:

- 2.1 We believe that this Oak Lodge School should provide a caring, positive, safe, and stimulating environment that promotes the social, physical, spiritual, and moral development of the individual child; enabling all children to thrive.
- 2.2 We recognise the importance of providing an environment within our school that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and to feel confident that they will be listened to. We recognise that both mental and physical health are relevant to safeguarding and the welfare of children
- 2.3 We recognise that all adults within the school, including permanent, supply staff, temporary staff, volunteers, parents, and governors, have a full and active part to play in protecting our pupils from harm.
- 2.4 We will work pro-actively with parents to build a solid understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

## 3 SCOPE

- 3.1 In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEN it is up to 25 years of age.
- 3.2 This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

## 4 THE LEGAL FRAMEWORK

- 4.1 Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make the necessary arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.
- 4.2 Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to co-operate with the local authority to improve the well-being of children in the local authority area.
- 4.3 Under section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school or further education institution to supply information to perform its functions. This must be complied with.
- 4.4 This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

*Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, July 2018:*  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

*Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2022*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2022\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)

All procedures can be found on the Wandsworth Safeguarding Children Partnership website:

[Home - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](http://wscp.org.uk)

## 5 ROLES AND RESPONSIBILITIES

- 5.1 Keeping Children Safe in Education (KCSIE) remained in force throughout the response to coronavirus (COVID-19). Guidance on keeping children safe in education continues to support the response to a pandemic if needed.
- 5.2 The school's Designated Safeguarding Lead (DSL) with overall designated responsibility for safeguarding is Karen Duggan-Stevens. We have a deputy designated safeguarding lead (s), Jess Doyle to ensure there is always appropriate cover for this role. The responsibilities of all Designated Safeguarding Lead are described in detail Appendix A.

The Designated Safeguarding Lead will be on our school's leadership team and their role of Designated Safeguarding Lead (and the deputy) will be explicit in their job description. This person should have the appropriate authority and be given the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and Safeguarding matters, to take part in strategy discussions and inter-agency meetings – and/or

to support other staff to do so – and to contribute to the assessment of children. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. (KCSIE, 2022 para 103).

- 5.3 The school has a nominated Melody Fowler-Wright responsible for safeguarding to champion good practice, to liaise with the head teacher and to provide information and reports to the governing body.
- 5.4 The case manager for dealing with allegations of abuse made against school staff members is the head teacher. The case manager for dealing with allegations against the head teacher is the chair of governors Stephen Cave. The procedure for managing allegations is detailed in Appendix Document (Page 25).
- 5.5 The head teacher or proprietor will ensure that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities. All staff and other adults are clear about procedures where they are concerned about the safety of a child, including if children go missing from education.
- 5.6 The governing body is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.
- 5.7 All staff members, governors, volunteers, and external providers know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child. They are aware that behaviours and physical signs linked to behaviours that put children in danger. All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. Safeguarding issues can manifest themselves via child-on-child abuse. This may include, but not limited to bullying (including cyber bullying), gender-based violence/sexual harassment, sexual violence and assaults, harmful sexual behaviour, and sexting. Staff should recognise that children are capable of abusing their peers.
- 5.8 Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools, colleges and educational settings is here: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf))

It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND. We recognise that these children can be targeted by other children, so it is vital your school provide a safe space for these children to speak out and share their concerns with members of staff. Pupils are protected from up skirting, bullying (+ cyber), homophobic, biophobic, and transphobic behaviour, racism, sexism, and all other forms of discrimination.

Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response> ,

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people

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

It is important that schools record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it.

The guidance covers: It covers what sexual violence and harassment is, schools' and colleges' legal responsibilities, a whole school or college approach to safeguarding and child protection and how to respond to reports of sexual violence and sexual harassment

Children may not feel ready to, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a professional curiosity and speaking to the DSL.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system, and their wishes and feelings considered and that the law on child-on-child abuse is there to protect them, not criminalise them.

A bespoke helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

- 5.9 There is a Digital Safety policy, which covers the use of mobile phones, cameras, and other digital recording devices e.g., i-Pads. For online safety, there is within the policy support about children accessing the internet whilst they are at school using data on their phones (3G or 4G networks). The policy reinforces the importance of online safety, including making parents aware of what your school ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)

Governing bodies and proprietors are doing all that they reasonably can to limit children's exposure to the risks from the school's or college's IT system and ensure the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.

The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The policy for remote learning that demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all their pupils to attend in person. All IT policies are located in the policy folder on the P drive.

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

## 6 SUPPORTING CHILDREN

- 6.1 We recognise that children who are abused or witness violence (Domestic Abuse) are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. We also recognise children who witness domestic abuse are victims, that witnessing domestic abuse can have a lasting impact on children, and that children can be victims in their own relationships too <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help> They may feel helpless, humiliated and some sense of blame. Our school may be the only stable, secure, and predictable element in their lives.
- 6.2 We accept that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 6.3 **Our school will support all pupils by:**
- ensuring the content of the curriculum includes social and emotional aspects of learning; Through PSHE, RHSE and other curriculum contexts, pupils are encouraged to talk about feelings and deal assertively with pressures, are listened to, and know to whom they can turn to for help and advice.
  - providing pupils with a range of appropriate adults to approach if they are in difficulties; and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
  - supporting the child's development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness while not condoning aggression or bullying; The anti-bullying policy is located in the policy folder on the P drive.
  - ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly; plus, Relationship and Sexual Health Education (RSHE) requirements.
  - liaising and working together with other support services and those agencies involved in safeguarding children, including domestic abuse <https://www.gov.uk/government/consultations/domestic-abuse-act-statutory-guidance>
  - ensuring that the curriculum will help children stay safe, recognise when they do not feel safe and identify who they might or can talk to and will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including, sexual harassment, peep-on-peer abuse, 'sexting' and the displaying of 'Harmful Sexualised Behaviour'; <https://www.csacentre.org.uk/resources/key-messages/harmful-sexual-behaviour/>

- The school will consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Having a relationship and behaviour policy that is aimed at supporting vulnerable pupils in the school. The school will ensure that each pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred; The relationship and behaviour policy is located in the policy folder on the P Drive.
- The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- Clear procedures are in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment - these procedures are easily understood and easily accessible. Children who have experienced sexual violence can display a wide range of responses, so the school will remain alert to the possible challenges of detecting those signs and show sensitivity to their needs
- playing a crucial role in preventative education and preparing pupils for life in modern Britain. There is a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biophobic and sexual violence/harassment. This will be underpinned by the school's behaviour policy, pastoral support system and a planned programme of RSHE delivered regularly, tackling issues such as: boundaries; consent; body confidence; stereotyping; and sexual harassment
- acknowledging the importance of 'contextual safeguarding', <https://contextualsafeguarding.org.uk/> which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare. (Working Together to Safeguard Children 2018 and KCSIE September 2022).
- Liaising with a range of Early Help agencies that support the pupil such as Health Services, Wandsworth Social Care, Child and Adolescent Mental Health Services, Education Welfare Services, Special Educational Support Services, Youth Services, and the Educational Psychology Service.  
<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>
- Ensuring that, when a pupil who is the subject of a Child Protection (CP) Plan leaves, their information is transferred to the new school within two weeks and that the child's Social Worker is informed that the child has moved.
- Alert the authority if it is aware of any child being care for under a Private Fostering arrangement (<https://fis.wandsworth.gov.uk/>). On admission to school, and at other times, the school will be vigilant in identifying any private fostering arrangement.
- Acknowledging that a child that is looked after (CLA) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep CLA and previously looked after children safe. It is important that all agencies work together, and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.
- Applying disciplinary measures such as restraint or isolation in response to incidents involving children with special educational needs and disabilities (SEND), by considering the risks carefully, given the additional vulnerability of the group.
- Recognising that to safeguard a pupil, it may be necessary to use restraint and yet restraint is likely to impact on the well-being of the child. By planning positive and proactive behaviour support, schools and colleges can reduce the occurrence of risky behaviour and the need to use restraint. Guidance is available here:

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

## 7 SAFEGUARDING PROCEDURE

- 7.1 We have developed a structured procedure in line with *Wandsworth Safeguarding Children Partnership* which will be followed by all members of the school community in cases of suspected abuse. This is detailed in Appendix Document 8 (page 55).
- 7.2 In line with the procedures, the Multi Agency Safeguarding Hub will be contacted as soon as there is a significant concern: (See Key Contacts for further details)
- 7.3 The name of the Designated Safeguarding Lead will be clearly advertised in the school and on the website, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- 7.4 We will ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children by publishing the policy and procedures on our website and by referring to them in our introductory school materials.
- 7.5 We will use the NSPCC- When to call the police to help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

## 8 DEALING WITH A DISCLOSURE MADE BY A CHILD – ADVICE FOR ALL MEMBERS OF STAFF

- 8.1 If a child discloses that he or she has been abused in some way, the member of staff or volunteer should consider ways to:

**Receive** - Listen actively, open body language, accept, non-judgmental. Use TED (tell, explain, describe)

**Reassure** - 'You've done the right thing by coming to me', re-assure child that you have listened and hear what they are saying; don't promise what can't be delivered

**Respond** - Tell what you are going to do and do it. Ensure child is ok before leaving

**Report** - As soon as possible, to the Designated Senior Lead (DSL) in the school / setting

**Record** - Vital to stick to the facts, no opinions – Think about When? Where? Who? What?

**Review** – Take responsibility to follow up any referral (via your DSL)

In addition:

- Inform the Designated Safeguarding Lead without delay and follow safeguarding process.
- Complete the Safeguarding incident/welfare concern form and pass it to the DSL.

*Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL.*

Further information about what to do if you are worried that a child is being abused is available here in advice for practitioners: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

### **The role of an appropriate Adult in Safeguarding:**

The Police and Criminal Evidence (PACE) act advises that “The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons”, with there being further elaboration that the AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights.

The role of AA is not restricted to specific individuals, in relation to children and young people under the age of 18, PACE guidance sets out that the AA can be: the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.

<https://safeguarding.network/content/safeguarding-and-the-role-of-the-appropriate-adult/>

### **RECORD KEEPING**

- 8.2 All concerns, discussions and decisions made and the reasons for those decisions **must** be recorded via MY CONCERNS to be used to capture the child’s voice and their daily lived experience.
- 8.3 We will continue to support any pupil leaving the school about whom there have been concerns by ensuring that all appropriate information, including Safeguarding and welfare concerns, is forwarded under confidential cover to the pupil’s new school as a matter of priority.
- 8.4 Schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home to reduce the risk of not making contact with family members where welfare and/or safeguarding concerns are identified. (Keeping Children Safe in Education 2022)

### **DISCUSSING CONCERNS WITH THE FAMILY AND THE CHILD – ADVICE FOR THE DESIGNATEDSAFEGUARDING LEAD (DSL) AND DEPUTY DSLs**

- 9.1 In general, you should always discuss any concerns the school may have with the child’s parents. They need to know that you are worried about their child. However, you should not discuss your concerns if you believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.
- 9.2 If you make a decision not to discuss your concerns with the child’s parents or carers, this must be recorded in the child’s Safeguarding file with a full explanation for your decision and the reason for this decision.
- 9.3 It is important to record and consider the child’s wishes and feelings, as part of planning what action to take in relation to concerns about their welfare. Capturing the lived experience of the child is paramount to ensure that actions remain child centred (See Appendix document) to capture the child’s lived experience and their own words when possible.

- 9.4 When talking to children, you should take account of their age, understanding and preferred language, which may not be English. It is also important to consider how a SEND child may need support in communicating.
- 9.5 How you talk to a child will also depend on the substance and seriousness of the concerns. You may need to seek advice from the MASH or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.
- 9.6 If concerns have arisen because of information given by a child, it is important to reassure the child but not to promise confidentiality.
- 9.7 It is expected that you discuss your concerns with the parents and seek their agreement to making a referral to the MASH, unless you consider that this would place the child at increased risk of significant harm.
- 9.8 You do not need the parents' consent to make a referral if you consider the child needs protection, although parents will ultimately be made aware of which organisation made the referral. If parents refuse to give consent to a referral but you decide to continue, you need to make this clear to the MASH.
- 9.9 If you decide to refer the child without the parents' consent, make sure to record this with a full explanation of your decision.
- 9.10 When you make your referral, you should agree with the MASH what the child and parents will be told, by whom and when. The school as a relevant agency, should be part of discussions with statutory safeguarding partners to agree to the levels for the different types of assessment as part of local arrangements.

**If the child is out of borough please contact their local MASH team and follow the same guidance below. All councils will provide out of hours MASH contact details on their website.**

**MAKING A REFERRAL** - If a child or young person is at risk of harm, abuse or neglect please report it to the MULTI AGENCY SAFEGUARDING HUB (MASH)

Mon-Fri, 9:00am – 5.00pm Tel: 020 8871 6622

Outside of these hours Tel: 020 8871 6000

Email: [Mash@wandsworth.gov.uk](mailto:Mash@wandsworth.gov.uk)

In an emergency always call police on 999.

If you think there has been a crime, but it is not an emergency call 101.

The online Request for Services Multi Agency Referral Form can be accessed here:

[Make a referral to the Multi-Agency Safeguarding Hub \(MASH\) - Wandsworth Borough Council](#)

## **10 SAFER WORKFORCE AND MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS (This procedure is detailed in Appendix document)**

- 10.1 We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding

checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2022*. In addition to obtaining the DBS certificate, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

A check of any prohibition can be carried out using the Teacher Services' system that may be found here: <https://teacherservices.education.gov.uk/>

Prohibition orders are described in the National College for Teaching and Leadership's (NCTL) publication *Teacher misconduct: the prohibition of teachers*. It can be found here:

<https://www.gov.uk/government/publications/teacher-misconduct-the-prohibition-of-teachers--3>

- 10.2 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. See Appendix document, for information on Single Central Record (SCR). The single central record must cover the following people: all staff, including teacher trainees on salaried routes, agency and third-party and supply staff who work at the school. The Single Central Record is kept on SIMS.
- 10.3 Every job description and person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. The school website will echo this within our 'work for us' section. The school will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.
- 10.4 We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 5 years.
- 10.5 We have a procedure in place to manage allegations against members of staff, supply staff and volunteers (and to respond to low level concerns) in line with WSCP procedures here: allegation against professional procedures. We will communicate with Local Authority Designated Officer (LADO), through consultations and referrals when needed. [Allegations against staff and volunteers who work with children - Wandsworth Borough Council](#)
- 10.6 Supply teachers – we will consider all allegations against an individual not directly employed by, where disciplinary procedures do not fully apply, (for example, supply teachers provided by an employment agency) and ensure allegations are dealt with properly and communication with supply agency and Local Authority Designated Officer (LADO) is continued throughout the investigation.
- 10.7 There is an agreed staff behaviour policy (sometimes called the code of conduct) which is compliant with 'Safer Working Practices', and includes - acceptable use of technologies, staff/pupil relationships, low level concerns and communications including the use of social media. The staff behaviour policy is located on the P Drive in the policy folder.
- 10.8. For agency and third-party supply staff, schools and colleges must also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

Further Guidance from Feb 2022 can be accessed:

<https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>

## 11 STAFF INDUCTION, TRAINING AND DEVELOPMENT

- 11.1 All new members of staff, including newly qualified teachers and teaching assistants, will be given induction that includes basic safeguarding training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding policy, staff code of conduct, Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges and other related policies. All governors and trustees should receive appropriate safeguarding and child protection (including online) training at induction. There are mechanisms in place, such as safeguarding updates, to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education. Staff should also read, "Working Together to Safeguard Children." July 2018
- 11.2 The induction will be proportionate to staff members' and governors' roles and responsibilities
- 11.3 All Designated Safeguarding Leads (DSLs) will undergo updated DSL safeguarding training every 2 years. DSLs should undertake Prevent awareness training and disseminate the training to all staff annually.
- 11.4 All staff members of the school will undergo face to face training (whole-school training) which is regularly updated and at least every three years. *All governors must undergo governor specific awareness training to equip governors with the knowledge to provide strategic challenge, so they are assured safeguarding policies/procedures are effective and deliver a robust whole-school approach to safeguarding. This training should be regularly updated.* All staff will have access to WSCP multi-agency safeguarding training and e-learning. Training - Wandsworth Safeguarding Children Partnership (wscp.org.uk) and <https://tpd.org.uk/cpd/portal.asp>
- 11.5 Staff members who miss the whole-school training will be required to undertake other relevant training to make up for it, by meeting with the DSL/DDSL who will then outline what they need to read/watch (BSL) following on from the missed training. Whole-school training will be filmed with a BSL interpreter to ensure that all staff have access to this training if they miss any sessions. A whole-school register will be taken at the training and the admin team will follow up with any staff who have not yet completed the training.
- 11.6 The nominated governor for safeguarding will undergo training prior to or soon after appointment to the role; this training will be updated every three years. All governors will receive appropriate safeguarding training annually.
- 11.7 We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.

- 11.8 The Designated Safeguarding Lead will provide briefings to the school on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPR's) in line with Working Together 2018. These will occur annually or more frequently when necessary.

Learning from Child Safeguarding Practice Reviews - Wandsworth Safeguarding Children Partnership ([wscp.org.uk](http://wscp.org.uk))

- 11.9 The school will maintain accurate and up to date records of staff induction and training.

## **12 CONFIDENTIALITY, CONSENT, AND INFORMATION SHARING**

- 12.1 We recognise that all matters relating to Safeguarding are confidential.
- 12.2 The Head Teacher or the Designated Safeguarding Lead will disclose any information about a pupil to other members of staff on a need-to-know basis only
- 12.3 All staff members must be aware that they cannot promise a child to keep key information a secret or to themselves which might compromise the child's safety or well-being.
- 12.4 All staff members have a professional responsibility to share information with other agencies in order to safeguard children.
- 12.5 All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.
- 12.6 We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.
- 12.7 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision- the right support at the right time .

[https://wscp.org.uk/media/1448/london\\_multi-agency\\_safeguarding\\_data\\_sharing\\_agreement.pdf](https://wscp.org.uk/media/1448/london_multi-agency_safeguarding_data_sharing_agreement.pdf) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). The following link supports schools' staff further; <https://blog.insidegovernment.co.uk/schools/information-sharing-the-seven-golden-rules-to-follow> 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 promote the welfare and protect the safety of children. ([KCSIE 2022](#))

## **13 INTER-AGENCY WORKING**

- 13.1 We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police, and Children's Social Care. Early help means providing support as soon as a problem emerges at any point in a child's life, from

the foundation years through to the teenage years. For more information on Early Help click: [Early Help Practitioners' Hub | Wandsworth Family Information Service](#)

- 13.2 We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children
- 13.3 We will participate in Child Safeguarding Practice Reviews (CSPR's), other reviews and file audits as and when required to do so by the Wandsworth Safeguarding Children Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and compile required actions within agreed timescales.

#### **14 CONTRACTORS, SERVICE AND ACTIVITY PROVIDERS AND WORK PLACEMENT PROVIDERS**

- 14.1 We will ensure that contractors and providers are aware of our school's safeguarding policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.
- 14.2 We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2022*. If assurance is not obtained, permission to work with our children or use our school premises may be refused.
- 14.3 When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

#### **15 WHISTLE-BLOWING AND COMPLAINTS**

- 15.1 We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so. The school / college Whistle Blowing policy is located .....

Whistleblowing: guidance and code of practice for employers is located:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415175/bis-15-200-whistleblowing-guidance-for-employers-and-code-of-practice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415175/bis-15-200-whistleblowing-guidance-for-employers-and-code-of-practice.pdf)

Whistleblowing Advice Line is available for all worker - 0800 028 0285  
 - Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- 15.2 We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of Safeguarding, which does include the attitude or actions of colleagues. If necessary, they will speak with the head teacher, the chair of the governing body or with the Local Authority Designated Officer (LADO).
- 15.3 We have a clear reporting procedure for children, parents, and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that Low-level concerns can arise in several ways from various sources, e.g., suspicion, complaint, or a disclosure. Procedures in place for confidentially sharing and handling of low-level concerns.
- 15.4 We will actively seek the views of children, parents and carers and staff members on our Safeguarding arrangements through surveys, questionnaires, and other means.

#### **16 SITE SECURITY**

- 16.1 All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.
- 16.2 We check the identity of all visitors and volunteers coming into school. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance. The "Oak Lodge School Visitor Safeguarding & Event of Fire Guide" is located in the policy folder on the P Drive.
- 16.3 The school will not accept the behaviour of any individual, parent, or anyone else, that threatens school security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

**17 QUALITY ASSURANCE**

- 17.1 We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.
- 17.2 We will complete an audit of the school's safeguarding arrangements at frequencies specified by the Wandsworth Safeguarding Children Partnership and using the Section 175 online audit tool provided by them for this purpose. More information including how to register for the audit: [LADO \(Local Authority Designated Officer\) | Wandsworth Family Information Service or Home - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](#)
- 17.3 The school's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

**18 POLICY REVIEW**

- 18.1 This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle
- 18.2 The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures
- 18.3 Additional updates to the safeguarding policy and appendix will take place when needed.

Updated Policy Date:	Scheduled review by SCHOOL
31 <sup>st</sup> August 2022.	22/06/2023

## Appendix 1

### *Types and signs of abuse*

Staff must refer to KCSIE 2022 .

#### Indicators of abuse and neglect

All school and college staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**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 the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Specific forms of abuse and safeguarding issues

It is important to recognise that many children will be living (or may have lived) in families where **Domestic Abuse** is a factor, and that these situations have a harmful impact on children emotionally, as well as placing them at risk of physical harm. The definition of Domestic abuse is: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those **aged 16 or over** who are or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional harm. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The [Domestic Abuse Act 2021 \(Part 1\)](#) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and (e) psychological, emotional, or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

**Operation Encompass (formerly Project Tearose)** is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Schools.

**Operation Encompass** operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare.

If police have responded to a domestic incident and there are children in the family, the officers working on Operation Encompass will disclose this incident to the child's school the following morning (Monday to Friday). The actual content of the information shared is kept to the minimum, i.e. outlining the offence, but without specific details.

At each school, the information is shared securely with the Designated Safeguarding Leads and is treated as sensitive and confidential. The school recognises should there be a change in staffing structures it is their responsibility to notify the Local Authority of any changes and provide up to date contacts. It is the school's responsibility to raise any concerns with regards to The Box. The school must ensure staff who are signed up to The Box system understand local processes in relation to Operation Encompass. Operation Encompass is integral to Children's Services and any queries should be directed to:

**Safeguarding Queries: MASH or Safeguarding Education Officer**

**Technical Queries: Safeguarding Education Officer (can signpost and support)**

**Training Queries: MASH or Safeguarding Education Officer**

Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared to ensure the safety and wellbeing of the child and so that support can be offered to the child if necessary. The school is part of the network available to support the family and child.

**Child sexual exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.

- Exclusion or unexplained absences from school, college, or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories); and

- Sexual identity.

More information can be found in *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)

**Child Criminal Exploitation** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

CCE and CSE can affect children, both male and female and can include children who have moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may be the same, however professionals should be aware that girls are at risk if criminal exploitation too. It is also important to note that boys and girls being criminally exploited maybe at higher risk of sexual exploitation. Further information of definitions and indicators is included in Annex B of KCSIE.

**Gangs & Child criminal exploitation:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network

**Sexual violence and sexual harassment between children** can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

See Appendix 2 below for more information about **peer on peer (child on child) abuse**, including **sexual violence and sexual harassment between children**.

The Voyeurism (Offences) Act 2019, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any sex, can be a victim. **Up skirting is** a highly intrusive practice, which typically involve someone taking a picture under another person's clothing (not necessarily a skirt) without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). Up skirting is a specific criminal offense in England and Wales. Anyone, and any gender, can be a victim and this behaviour is completely unacceptable. Where committed for sexual gratification, up skirting can result in the most serious offenders being placed on the sex offenders' register.

**Serious Violence:** Indicators which may signal those children are at risk from or are involved in serious violence include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, sign of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions would also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. More advice can be found in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

**Honour-Based Abuse:** so, called 'honour-based abuse' (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network

of family or community pressure and can include multiple perpetrators. The school is aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

**Female Genital Mutilation (FGM):** Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and have a specific legal duty to act with regards to concerns about FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM \(HM Government, July 2020\)](#) (pages 59-61 focus on the role of schools).

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting, or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.

- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

FGM is illegal in the UK and there is a mandatory duty on teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(January 2020\)](#) for further details about the duty.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: handling case of forced marriage \(HM Government, June 2014\)](#). Pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage](#) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk) for advice and information.

**Children and the court system:** Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

**Children with family members in prison:** Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. > [NICCO](#)

**Children Who Go Missing from Home or Care** are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- No means of support or legitimate income – leading to high risk activities
- Involvement in criminal activities
- Victim of Abuse
- Victim of crime, for example through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health
- Missing out on schooling and education
- Increased vulnerability

Longer-term risks include:

- Long-term drug dependency/alcohol dependency
- Crime
- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health.

**Children Missing from Education:** all children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A child going missing from education, or not attending it regularly, is a potential indicator of abuse or neglect. The school will follow the required procedures for unauthorised absence and for dealing with children who go missing from education, including appropriate notification to the Local Authority. The school will also ensure staff are alert to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as **travelling to war zones, FGM and forced marriage**. Refer to the Children Missing Education Policy and Attendance Policy for further information.

**Preventing radicalisation:** Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of the school's safeguarding approach.

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

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

**The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.** Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The school is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The school works within the curriculum to promote tolerance and respect for diverse views, while challenging prejudice of any kind. The school is an inclusive school which values citizenship and a sense of belonging. Pupils are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme, having consulted [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, April 2015\)](#).

The DfE and Home Office's briefing note [The use of social media for online radicalisation \(July 2015\)](#) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

As with all matters pertaining to the maintenance of a safeguarding culture within the school, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race, or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

If any concerns arise, or are disclosed by a child, they will be responded to following normal safeguarding processes and advice would be sought from colleagues in LA (either Prevent coordinator or safeguarding services) if necessary.

The school supports the **Prevent Strategy**, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism.

All schools must have due regard to the need to prevent pupils from being drawn into terrorism or being radicalised. The school will ensure that staff are provided with appropriate training and information to enable them to assess the risk of children being drawn into extremist ideas that are part of terrorist ideology and identify any child who may be at risk and how to support them. The school will also ensure that children are safe from terrorist and extremist material when accessing the internet in school. Concerns will be discussed with the child's parents whenever possible and with the Local Authority Prevent and Hate Crime co-ordinator and referrals made to the Channel programme when appropriate. All referrals are made via MASH.

**Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies are aware of contact details and referral routes into

the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, the school understands that this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The school recognises that in some cases 16 - 18-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

### Potential signs of abuse

#### **Recognising physical abuse**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

#### Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby (pre-mobile)
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally

- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g., belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

### Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

### Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### Fractures

Fractures may cause pain, swelling and discoloration over a bone or a joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type

- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

### Scars

A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

### Behavioural Indications

Some children may behave in ways that alert a staff member to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others

### **Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g., anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others

- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harming
- Running away

### **Recognising Neglect**

Evidence of neglect is built up over a period and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene, and medical care
- A child seen to be listless, apathetic, and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

### **Recognising Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child / family.

Recognition can be difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age

- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self-mutilation, and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g., sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia, or clothing
- Wetting or soiling

## **Appendix 2: Peer on peer (child on child) abuse**

The school recognises that children are capable of abusing their peers (including online) and works to minimise the risk of peer on peer (child on child) abuse and will deal with any allegations robustly. Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable. It is recognised that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion in accordance with the procedures in this policy.

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this section of the policy, 'child' refers to any child or young person up to the age of 18 years. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger. Safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault (see 'Harmful sexual behaviour' below)
- sexual harassment such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse (see 'Harmful sexual behaviour' below).
- causing someone to engage in sexual activity without consent, such as forcing someone to stop, touch themselves sexually, or to engage in sexual activity with a third party.
- up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause victim humiliation, distress, or alarm

- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery) (see below); and
- 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)

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is of a serious nature, possibly including a criminal offence
- refers to a pupil's behaviour towards a more vulnerable pupil (including where there is a difference in age)
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

The school takes steps to minimise the risk of all types of peer-on-peer abuse. Staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. The school has robust anti-bullying procedures in place (see the school's Anti Bullying Policy) and pupils are taught at all stages of the school about acceptable behaviour and how to keep themselves safe as part of the Life Education programme (see the Life Education Policy and Relationships and Sex Education Policy). Appropriate action is taken to protect pupils identified as being at risk including the particular vulnerabilities of those with a special educational need or disability. If needed a bespoke pupil safety plan is implemented.

### Harmful sexual behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The school recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the school recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all peer-on-peer abuse, is never acceptable and will be taken seriously. Sexual violence and sexual harassment can

occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The school will respond to allegations seriously and all victims will be offered appropriate support.

The school is aware of the importance of:

- making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child-on-child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded, or humiliated; and / or create a hostile, offensive or sexualised environment.

KCSIE 2021 Part 5 and the DfE [guidance Sexual violence and sexual harassment between children in schools and colleges \(September 2021\)](#) provides further detailed advice.

#### *Youth produced sexual or indecent imagery*

Indecent imagery is the legal term used to define nude or semi-nude images, videos or live streams of children and young people under the age of 18. This could be via social media, gaming platforms, chat apps or forms. It could also involve sharing between devices via services like Apple's Airdrop which works offline. Consensual and non-consensual sharing of nude images and/or videos can be signs that children are at risk.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive. The school follows the guidance given by the [UK Council for Internet Safety \(UKCIS\): Sharing nudes and semi-nudes \(December 2020\)](#).

The school treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

Members of staff should not view sexual imagery which is reported to them, or copy, print, share store or save the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

The DSL may in exceptional circumstances view images with the prior approval of the headmaster and only where:

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents.
- it is necessary to report the image to a website or agency to have it taken down; or
- a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

Where viewing an image is unavoidable:

- viewing should take place on school premises wherever possible.
- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known).
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image.
- full details of the viewing must be recorded in the school's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it.
- any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the school must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

If images have been shared online and cannot now be deleted by the person who shared them, the school should consider reporting the images to the relevant web host or service provider (if an option is provided) or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a pupil receives unwanted images, the school should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

The UK Council for Child Internet Safety's advice [Sharing nudes and semi-nudes \(December 2020\)](#) contains details of support agencies and provides further information for schools on how to respond to incidents of nudes and semi-nudes.

The College of Policing has also produced a briefing note [Police action in response to youth produced sexual imagery \("sexting"\) \(November 2016\)](#) which provides information on how police forces treat instances of sexting by young persons.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services, as necessary.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others. All peer-on-peer abuse is unacceptable and will be taken seriously.

There is significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

### Process

When an instance of child-on-child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, staff should contact the DSL or deputies. The DSL (or

deputy) will make a referral to children's social care, CAMHS and police as appropriate in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues.

Where the allegation relates to an incident that took place within the school, or relates to pupils attending the same school, the school will take all appropriate action to ensure the safety and welfare and continued education of all pupils including the alleged perpetrator. The following are examples of action the school may take:

- Take advice from children's social care and / or the police, as appropriate, on when and how to inform the pupil and his / her parents about the allegations and how investigation of such allegations will be conducted
- Keep the involved children separate during the school day while the investigation is taking place to avoid collusion or intimidation. A pupil against whom an allegation of abuse has been made may be suspended from the school as a neutral measure during the investigation
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident (s)
- Keep a detailed log of actions, discussions, and decisions
- Assess the risk and implement a pupil safety plan as necessary – ensure that nonteaching times are considered, especially times when pupils are moving around the school as the child who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in school or elsewhere, other pupils may know what has happened (or is alleged to have happened). Other pupils may have been involved, either directly or indirectly. Other pupils may be judgemental or make unkind, or even threatening comments
- Consider whether the situation warrants information being shared with other parents in the school (e.g., where press coverage is likely) and seek advice from relevant agencies.

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children

- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (e.g., related to race, gender, physical, emotional, or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation, or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

The school will take advice from children's social care and / or the police, as appropriate, on how the investigation of such allegations will be conducted.

Appropriate support will be provided to all pupils involved by the school's pastoral team, and pupils may be referred to the school's counselling services. Support from external services will be requested, as necessary. Additional guidance is available via the London Child Protection procedures: [http://www.londoncp.co.uk/chapters/ch\\_harm\\_others.html](http://www.londoncp.co.uk/chapters/ch_harm_others.html)

### **Appendix 3: Visitors:**

- On site, teaching staff and support staff wear blue lanyards and the school name/ logo in white text. Teachers and support staff also have an ID badge with their name (members of the Senior Management Team also have their job title).
- All other visitors to the school are expected to sign in at reception using Inentry and will receive a sticker or badge dependant on the purpose of the visit.
- School governors wear a black lanyard with 'governor' written across it and a named ID card.
- **All** visitors are given a sticker that they must display throughout their visit.
- Visitors will also receive a copy of the "Oak Lodge Visitor Safeguarding and Event of Fire Guide". They are expected to read this before commencing their visit.

## **Appendix 4**

### ***Safeguarding protocol for offsite sports grounds***

External sites used by the school:

The school schedules its sporting activities at external venues to ensure that there is no crossover with the arrival and departure with other groups that use the facility. This prevents crossover of groups at the facilities and in particular in the changing areas. The school adopts a principle of ensuring the pupils can change with dignity, decency and privacy when needed, be it for reasons of physical development or other individual needs.

When the school uses external facilities, members of staff will check the facility on arrival and report any concerns about the condition of the facility to the host, where possible before the start of the session.

The school establishes an understanding with other groups that share the facilities. During the period of use the school decides normal operating procedure (OP) and the emergency action plan (EAP).

### ***Transportation to external sports facilities***

#### **Public transport**

The school utilises public rail and buses to transport pupils to and from external sports facilities. Pupils are accompanied by a member of staff competent in discipline, control and organisation and dealing with any crisis that may arise.

. Parental consent is requested and secured before pupils are permitted to travel independently.

#### **School Minibuses**

All pupils are allocated a forward-facing seat with seatbelt and the driver is responsible for ensuring all seatbelts are worn.

#### **Private Hire Coaches**

The school uses a reputable transport company to provide coach travel. The coaches are fitted with seatbelts and pupils are supervised throughout the travel time by competent staff.

## **Appendix 5**

### ***Procedures regarding allegations against staff***

The usual procedure regarding allegations against staff is set out below but may be varied according to the specific circumstances of the allegation.

There may be a need for the Headteacher to involve the police immediately, in cases of potential serious risk of harm to children or where there is evidence of a criminal offence having been committed.

In other cases, the Headteacher or DSL (or chair of governors if the allegation involves the Headteacher) will discuss the allegation with the LADO (or his/her deputy) immediately (and in any event within one working day) before further action is taken.

The person taking action in accordance with these procedures is known as the '**case manager**'.

#### **Disclosure of information**

The case manager will provide the accused person with information about the allegation, as quickly and in as much detail as is possible after the LADO has been consulted. The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

#### **Further action to be taken by the school**

A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The school will take action in accordance with Part 4 of KCSIE and the school's employment procedures.

A member of staff (or worker) resigning, retiring or ceasing to provide services during the period between an allegation being made and the case being concluded, should not prevent the relevant processes being completed.

### *Ceasing to use staff*

If the school ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the Disclosure and Barring Service (**DBS**) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the proprietor without delay. The school may also need to consider a referral to the DBS if a member of staff is suspended or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the school in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met. Refer to DfE guidance [Making barring referrals to the DBS](#) for further information.

Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (**TRA**) should be made where a teacher has been dismissed or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

### *Record keeping*

A clear and comprehensive summary of the allegation, details of how it was followed up and resolved, and a note of action taken, and decisions reached must be kept on the confidential personnel file of the individual, with a copy provided to them.

- The purpose of the record is: to enable accurate information to be provided in a future reference request; to give clarification where future DBS checks reveal information about an allegation that does not result in a criminal conviction; or to prevent unnecessary re-investigation of an allegation that resurfaces after a period of time.
- Details of allegations found to be malicious must be removed from personnel records.

The school will retain all safeguarding records and relevant personnel records for so long as reasonably required.

Employment references for an individual where an allegation has been made will include relevant details, unless the allegation (or series of allegations/concerns) have been proven to be false, unsubstantiated, or malicious.

### Conclusion

At the conclusion of a case where an individual has been suspended and may return to work, support for that individual will be discussed in advance. This may include a phased return, mentoring or specific support. Contact with the person who made the allegation will also be discussed so that it can be proactively managed.

At the conclusion of a case where an allegation is determined to be unsubstantiated or malicious, the LADO may refer the matter to children's social care services to assess whether there are other services that they need, or if abuse has happened with someone else. Where an allegation is proven to be deliberately invented or malicious, the headmaster may consider disciplinary action against the pupil. Where such an allegation has not come from a pupil, the police may be asked if any action should be taken against the person responsible.

At the conclusion of any case where an allegation has been made against a member of staff, the DSLs should review the circumstances of the case with the headmaster, to determine any lessons that may be learned, to improve procedures or practice within the school and prevent any future incidents.

WCSP have produced a resource outlining the process for dealing with allegations about staff:

<https://wscp.org.uk/find-help/professionals-and-volunteers/allegations-against-staff-andvolunteers-who-work-with-children-or-those-in-a-position-of-trust/>

## **Appendix 6**

### ***Safeguarding for Online Learning and Teaching***

This document sets out Oak Lodge School's guidelines to ensuring that teachers and pupils can teach and learn safely in an online environment.

Pupils, parents, and staff are made aware of how to report any safeguarding concerns. The safeguarding team will monitor these and support anyone that reports a concern and take follow up action as appropriate.

Staff should be proactive in reporting any safeguarding incidents or potential concerns.

### Online Learning Platforms

The school has developed an online teaching provision using a number of platforms to provide pupils with a thorough and safe learning experience, which staff must access using school user accounts. Where a teacher wishes to consider using a new platform, this must be discussed with the assistant head: academic and head of IT and compliance before being used with any pupils.

Video and Audio calls.

When communicating with pupils in the online environment, teachers should be mindful to maintain the same professional standards they would in a physical school setting. Staff should ensure that their attire is appropriate for a school environment and are required to use an appropriate virtual or blurred background.

**A number of measures have been put in place to safeguard staff and pupils:**

1. **When pupils join a class online they will be placed in the 'waiting room'. Teachers will only admit those that they recognise from the 'waiting room'.**
2. **Teachers can lock a class once all pupils have joined.**
3. **Pupils will not be able to private message each other**
4. **Pupils will see a notification if a teacher chooses to record a class**

Group video and audio calls

- When teaching in an interactive environment, teachers should remind pupils regularly of appropriate behaviour and expectations. If a pupil becomes disruptive, the teacher should initially issue a verbal warning and reminder of expectations. The teacher can consider moving the pupil causing disruption into the waiting room for a short period.
- If there is an issue during a lesson, this should be reported on **SYSTEM** or to the appropriate member of the pastoral team.

**1-to-1 video and audio calls**

Protocols around one-to-one meetings between staff and pupils have been adapted to reflect the online environment and ensure that the school replicates the safeguarding arrangements that would be in place in the physical school setting as much as possible.

- Before arranging a 1-to-1 video or audio call with a pupil, the teacher should seek approval. For academic matters this is the deputy head: academic, and for pastoral matters the appropriate head of section (with the deputy head: pastoral informed).
- Details of the meeting should be emailed to the pupil, and parents and appropriate head of department or head of section must be copied into the email. This would allow the HoD or HoS to drop in, very much in the way they could in a physical setting.

- All 1-to-1 video conferences should be recorded with consent from the parents. These will be automatically stored on the school network. *Recording sessions gives teachers an additional layer of protection.*
- 1-to-1 audio calls do not need to be recorded. A teacher can choose whether to call via *Teams*, or to a telephone number agreed with the parents.
- Encourage parents to be present at the beginning of a meeting and where appropriate, advise that the door is left open to the room the pupil is in.
- If using *Teams*, a meeting should be scheduled so it is recorded in the calendar.
- Teachers should use a landline at school where possible. If a teacher must use their personal mobile, they must make sure their number is hidden by prefacing the dialled number with 141, and ensure they do not store any pupil or parent number in their phone.
- A record that the call took place, and where appropriate, the outcome of the discussion should be made in **SYSTEM**.
- Should it become necessary to speak with a child without the parents' prior knowledge (e.g. in the case of a serious safeguarding concern), this must only be done with express permission from the deputy head: pastoral.

### **Communicating with students undertaking re-sits**

For staff supporting leavers who are preparing for re-sits, it is important that the appropriate protocols are followed for staff and pupil protection.

Staff are reminded that they remain in a position of responsibility and the relationship with the pupil should continue in the professional manner it would within any pupil still attending the school and within the boundaries of the staff code of conduct.

Staff who are concerned by any interaction with a pupil where they feel their own behaviour may be misconstrued or misinterpreted, or the pupil presents or acts in a way that could be deemed inappropriate or at odds with the normal teacher-student relationship should report this using neutral notifications or speak directly with the DSL. It is important that any such concerns are reported at the time. Refer to the Supporting Students undertaking Re-sits guidance for further information.

## ***Appendix 7***

### ***Resources***

## **London Child Protection Procedures**

Procedures and guidance available here: <https://www.londoncp.co.uk/>

## **Wandsworth Child Protection Partnership Resources**

Advice on a number of key topics is available here: <https://wscp.org.uk/>

[Keeping Children Safe in Education \(DfE, September 2021\)](#)

[Working Together to Safeguard Children, \(DfE, July 2018\)](#)

[What to do if you are worried – revised guidance for all professionals to use if they are worried a child may be being abused \(DfE, March 2015\)](#)

[Information Sharing Guidance: Advice for practitioners providing safeguarding services to children, young people, parents and carer \(DfE, July 2018\)](#)

[Revised Prevent duty guidance for England and Wales \(HM Government, April 2021\)](#)

[Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, February 2021\)](#)

[Multi-agency statutory guidance on female genital mutilation \(HM Government, July 2020\)](#)

[When to call the police – Guidance for schools and colleges \(NPCC\)](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(DfE and UK Council for Internet Safety, December 2020\)](#)

[Children missing education \(DfE, September 2016\)](#)

[Criminal exploitation of children and vulnerable adults: county lines \(Home Office, February 2020\)](#)

[Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\)](#)

[Sexual violence and sexual harassment between children in schools and colleges \(DfE, September 2021\)](#)

[Mental Health and Behaviour in schools – Departmental Advice for School Staff \(May 2018\)](#)

## **Domestic Violence – Guide for Schools**

[NSPCC: UK domestic-abuse signs symptoms effects](#)

[Refuge: what is domestic violence/effects of domestic violence on children](#)

[SafeLives: young people and domestic abuse](#)

### **Thresholds for Intervention – Multi-Agency guidance**

Wandsworth Guidance, issued 2019

[https://wscp.org.uk/media/1252/wscp\\_thresholds\\_for\\_intervention.pdf](https://wscp.org.uk/media/1252/wscp_thresholds_for_intervention.pdf)

**Whistleblowing Policy** – General guidance can be found at

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

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Online Safety**

[Teaching Online Safety in Schools \(DfE, June 2019\)](#)

[UK Council for Child Internet Safety \(UKCCIS\) - Education for a Connected World \(June 2020\)](#)

[Vulnerable Children in a Digital World](#)

### **Peer on Peer Abuse**

[Peer on Peer Abuse Toolkit \(Farrer & Co, 2019\)](#)

### **Charity Commission**

[Strategy for dealing with safeguarding issues in charities \(Charity Commission, December 2017\)](#)

[Regulatory alert to charities - safeguarding \(Charity Commission, December 2017\)](#)

[How to report a serious incident in your charity \(Charity Commission, June 2019\)](#)

## Appendix 8

### Reporting an incident

myconcern <sup>®</sup> Demonstration School (8234321) MP B

Report a Concern My Concerns Resources - Search

### Report a Concern

**Name(s) of Pupil(s)**  Start typing a name, click on the relevant name in the drop down list

**Concern Summary**

**Send Concern to**

**Concern Date/Time**

**Details of Concern**

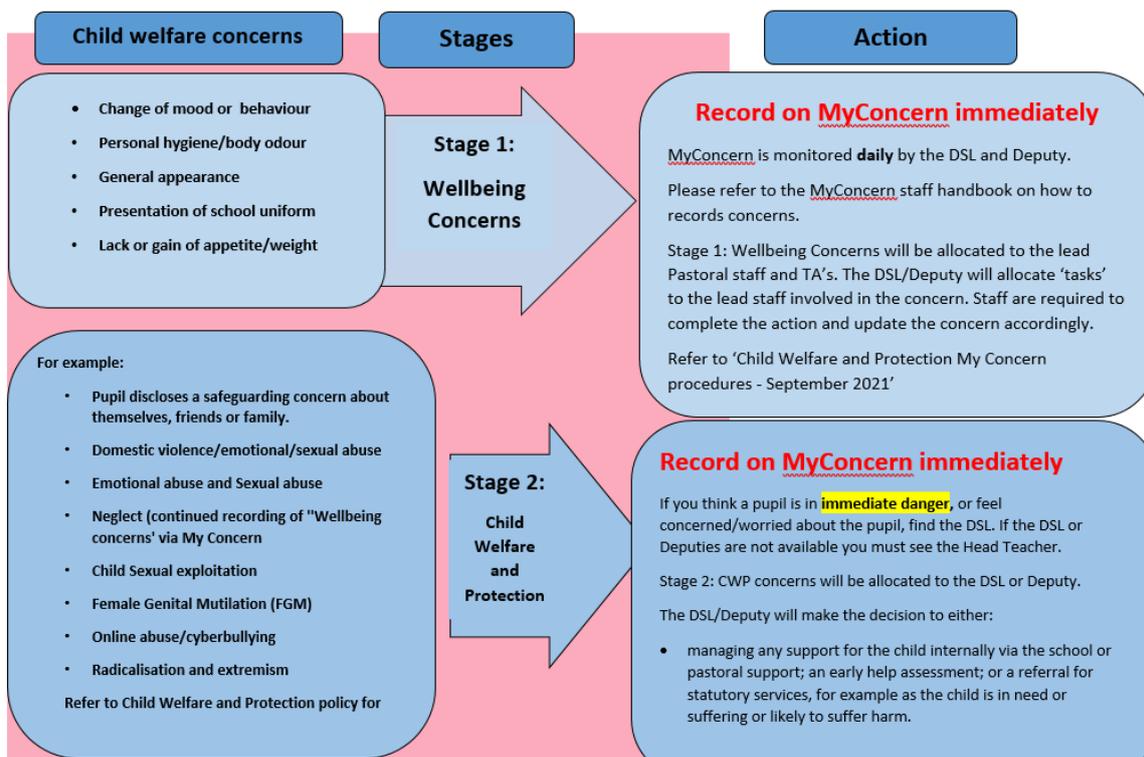
**Is this urgent?**  If YES, please check this box.

**Action taken**

**Attachments**    
 Please attach any relevant documents, images or other media.

**Submit Concern**

### Student Wellbeing and Safeguarding: Whole school practice



## Student Wellbeing and Safeguarding: Whole school practice



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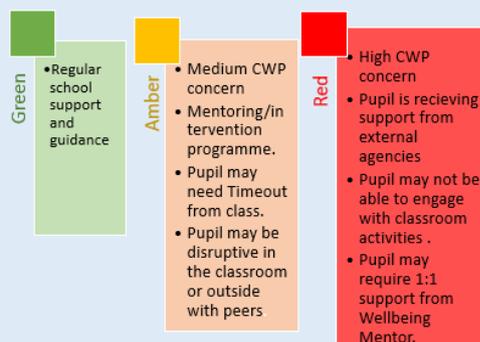
## Student Wellbeing and Safeguarding: Whole school practice

### Thresholds of intervention: Safeguarding 'Traffic light' system

#### Oak Lodge Health and Well being Programme:

From initial referral the pupil will receive regular support, and will be placed on an intervention programme depending on pupils needs.

- Green: Level 1: Prevention Programme in which all pupils receive the following:** pastoral teachers, PSHE/Emotions, Healthy Relationships and SRE workshops, Feeling Good Programme, PE curriculum and school Games programme, Enrichment, FT Curriculum, Pupil Voice and Leadership
- Amber Level 2: Intervention Programme:** School Counsellor (Post Graduate Diploma in Counselling), Talk and Draw Therapy, ALPs Additional Learning Provision, Well Being Mentors: Family Liaison and CWP, Behaviour and learning, Independence and Play, External specialist delivering courses related to current welfare, health and wellbeing issues e.g. E safety, FGM, HBV and Forced Marriage courses for pupils.
- Red Level 3: Intensive Programme:** DeafCAMHs and CAMHs, social services, and other organisations who can provide intensive support.



#### The communication of Safeguarding issues:

We recognise that matters related to Child Protection are of a confidential nature. When you have recorded your concern on My Concern do expect to be reassured that action is being taken and you may be requested to support the action as you are in the best position. The DSL or Deputies will therefore share detailed information about a pupil with other staff members on a need to know basis only.

In light of this, we have now introduced a 'traffic light' safeguarding alert. **GREEN, AMBER, RED.** The 'traffic light' system ensures that all staff are aware of the pupil's Wellbeing (linked to Safeguarding) whilst around the school, classroom and outside.

The Safeguarding team will notify all school staff by email, or at briefing if a pupil is on Amber or Red safeguarding alert.

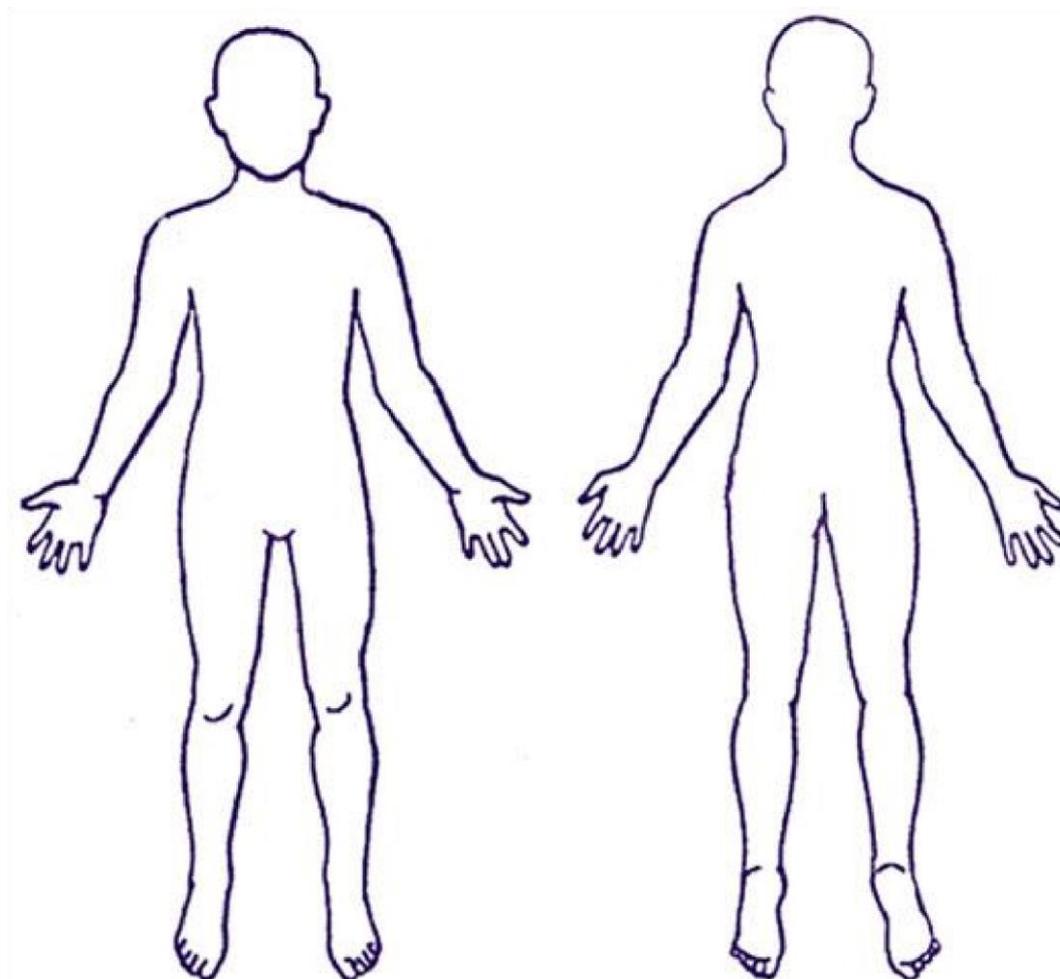
The Safeguarding team will also inform staff if the pupils needs increase or decrease depending on the CWP situation.

If staff are worried or concerned about the pupil, they must inform a member from the Safeguarding team who will then deal with the issue accordingly.

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**If relevant, indicate on the drawing below the parts of the body affected.**

**You must not expect or ask a pupil to either undress or show areas of their body for evidence which cannot be seen under normal clothing.**



This form should be completed as soon as possible after you are made aware the incident.

When filling in this form, it is essential that facts (and not opinions) are recorded. Pupils and parents may be entitled to see any written information on this matter. If in doubt please discuss the matter first with the DSL or, in their absence, one of their deputies.

Discretion is very important in these cases and, once the incident has been reported, colleagues should not discuss the matter any further with other parties, either now or at any point in the future.