



**PALMERS GREEN  
HIGH SCHOOL**

# **Child Protection and Safeguarding Policy (including promotion of welfare and early help)**

**Effective from 1<sup>st</sup> September 2021**

**This policy is available to parents on request from the School Office or a copy is downloadable from the School website. It also applies to the Nursery and Reception Class at PGHS.**

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## Preface

This policy applies to Palmers Green High School (PGHS; “the School”). The Governors hold ultimate responsibility for this policy and its implementation across the School. This policy is formally reviewed and approved by the Board of Governors annually and it takes account of government guidance and locally agreed inter-agency procedures put in place by the [Safeguarding Enfield Partnership](#). The policy applies to all staff and volunteers (including Governors) working at the School, including the Nursery and Reception Class (EYFS). It applies wherever staff or volunteers are working with pupils. The policy applies to all pupils in the School.

Governors and leaders of the School believe that children have a fundamental right to feel safe and protected from **any** form of abuse, including all forms of peer on peer abuse. At Palmers Green High School, it is our aim to provide a secure, caring environment and a curriculum that nurtures self-esteem, encourages independence and thus empowers children to take the steps required to build resilience and to protect themselves. At all times we will seek to actively promote the welfare of children in the School.

## Enfield Safeguarding Children Partnership Arrangements

The Enfield Local Safeguarding Children’s Partnership (LSCP) is made up of Enfield Council, NHS Enfield Clinical Commissioning Group and the Metropolitan Police Service. The multi-agency safeguarding arrangements were developed in response to a national drive to improve and increase children’s safety. These new arrangements will continue to be developed, and are reviewed annually. The wider partnership group includes many other agencies, for example, schools, hospitals, community groups, probation and Enfield residents, all of whom have a role in protecting children.

## Commitment to safeguarding and promoting the welfare of pupils

Palmers Green High School is fully committed to keeping children safe in all School settings, including out of school activities, and to taking action to promote the welfare of pupils at the School. The School takes a ‘whole school’ approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Safeguarding and promoting the welfare of children is **EVERYONE’S RESPONSIBILITY** and, whilst it is normal practice for the Designated Safeguarding Lead (DSL) to make referrals to the LSCP, **ANYONE** can make a referral. (Contact information is given in Appendix A and what the LSCP will do can be found in *KCSIE 2021*). Parents are encouraged to raise any concerns directly with the School. They may contact the ISI directly if they wish.

## Objectives

The information and procedures outlined in this policy are to guide staff, Governors and volunteers regarding the measures they should take in order to safeguard and promote the welfare of pupils at Palmers Green High School, including the children

in our Early Years Foundation Stage (EYFS) at the Nursery and in the Reception Class.

School staff, including support staff, are well placed to observe the outward signs of all forms of abuse. The School will therefore:

- establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to;
- ensure children know that there are adults in the School whom they can approach if they are worried;
- include opportunities in assemblies, in the PSHEE curriculum (including RSE) and through cross-curricular discussions for children to develop the skills they need to keep themselves safe from harm, including online and;
- support pupils who have been abused, and where appropriate in accordance with their agreed child protection plan.

The School believes that the best outcomes for children generally are achieved when professionals work in close collaboration with parents/carers. This belief holds equally in relation to child protection and safeguarding concerns. The School will be open and honest in communication and will share with parents/carers information or concerns that they have about their children at the earliest opportunity. The only exception to this would be where it was felt that such communication might compromise the safety of the child or staff concerned. In these circumstances the primary consideration will be the paramount interests of the child.

If a child is felt to be in need of protection and, following local authority child protection processes, becomes the subject of a child protection plan, the School will always aim to be an effective source of help and support to parents and carers in the context of effective inter-agency working and co-operation.

## **Definition**

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). 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. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## Key staff contacts in the school for implementing this policy

**Designated Safeguarding Lead (DSL)** is Miss Hannah Lucas (Deputy Head). She can be contacted via email at [hannahlucas@pghs.co.uk](mailto:hannahlucas@pghs.co.uk). Hannah Lucas is also the designated teacher for looked after children.

**Deputy Designated Safeguarding Lead (DDSL)** is Mrs Sarah Harney (EYFS Co-ordinator) who works mainly at the Nursery, 85 Wellington Road, Enfield EN1 2PL tel. 020 8292 1419. She can be contacted via email at [saharney@pghs.co.uk](mailto:saharney@pghs.co.uk)

**Deputy Designated Safeguarding Lead (DDSL)** is Mrs Wendy Kempster (Headmistress). She can be contacted via the School Office email at [office@pghs.co.uk](mailto:office@pghs.co.uk)

**Deputy Designated Safeguarding Lead (DDSL)** is Mr Steven Morris (SEnCo). He can be contacted via email at [stmorris@pghs.co.uk](mailto:stmorris@pghs.co.uk)

All of the above can be contacted via the School Office at Palmers Green High School, Hoppers Road, London N21 3LJ tel. 020 8886 1135.

The **nominated Governors with a special interest in safeguarding** are Mrs Bronwen Goulding and Mrs Karen Tidmarsh who, in conjunction with the Education Committee, and on occasion an external consultant, undertake a review of the relevant policy and procedures in the School before this policy is formally reviewed by the School Council (Full Board of Governors). The School Council formally reviews the policy annually and it is signed off by the Chair of Governors. One of the nominated Governors meets termly and is available by telephone at any time to discuss and monitor cases with the DSL. The **Chair of Governors** is Mr Dermot Lewis. All Governors can be contacted via the School Office at Palmers Green High School, Hoppers Road, London N21 3LJ tel 020 8886 1135) or via the Clerk to the Governors, Mrs Angela Monty, tel 020 8886 5803 or 020 8350 1501.

Key external contact details can be found in Appendix A.

## Training

All staff have training in their responsibilities for safeguarding children and promoting their welfare, the training includes Prevent, online safety and harmful sexual behaviours. Staff training is updated in the light of new regulations, LSCP or Government guidance in addition to any annual updates. Staff undertake a half-day



training course, normally every 2 years, from which the record of staff participation is kept by the DSL. Regular informal updates (at least annually) are undertaken to provide staff with relevant skills and knowledge to safeguard children effectively.

All staff have read, understood and agreed to abide by the guidance given in the following documents: Keeping Children Safe in Education (*KCSIE*) 2021 Part one (or for staff that do not work directly with children, Annex A), the School's Child Protection and Safeguarding policy, the Staff Code of Conduct, the Whistleblowing policy and the ICT Acceptable Use policy. The above is also covered in the Induction process for all new and temporary staff or volunteers at the start of their employment at PGHS. In addition, SMT and staff members who work directly with children have also read Annex B of *KCSIE* 2021.

Peripatetic teachers and volunteers are also required to undertake safeguarding training and are invited to attend the PGHS training sessions. If this is not possible, they are to provide a certificate to indicate that they have undertaken training via another educational establishment in the last 2 years or they can complete the EduCare training via their PGHS login. To cover any delay in providing evidence, a member of the Designated Staff will undertake Interim training with them.

Governors receive safeguarding training from an external consultant, the Headmistress, DSL or via the EduCare platform. They have also read, understood and agreed to abide by the guidance given in the following documents: Keeping Children Safe in Education (*KCSIE*) 2021 Part one (and other relevant sections depending on their responsibilities) and the School's Child Protection and Safeguarding policy.

Through the Headmistress's Termly Report to Governors and via the scrutiny of training records by the Safeguarding Governor (sometimes by external consultants), Governors maintain oversight of training for staff and volunteers and any issues emerging in the School in respect of child welfare, safeguarding or child protection.

Further information about the role and training of the DSL and Deputy DSLs can be found in Annex H.

## **Safer Recruitment of Staff**

At PGHS we will:

- ensure that we practise safer recruitment by checking the suitability of all staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in Part 3 of *KCSIE 2021* and Part 4 of The Independent School Standards Regulations.
- ensure that we carry out all necessary checks on the suitability of people who serve on the School's Governing Body in accordance with the above regulations and guidance given in *KCSIE 2021*.
- ensure that for staff engaged in management roles and Governors an additional check is undertaken to ensure that they are not prohibited under section 128 provisions as outlined in *KCSIE 2021*.

- ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) as soon as possible and **within 28 days**;
- ensure that where a teacher has been dismissed or would have been dismissed for misconduct had he/she not resigned, that consideration is given to referring the teacher to the Teaching Regulation Agency (TRA);
- ensure that whenever staff from another organisation are working with our pupils on another site, we have received assurances that appropriate child protection and recruitment checks and procedures apply to those staff;
- follow the local inter-agency procedures of the Local Safeguarding Children Partnership;

### **Training Note:**

The following have all completed Level 2 certificated training in safer recruitment. The Chair of Governors, Mr Dermot Lewis; the Headmistress and DDSL, Mrs Wendy Kempster; the Bursar, Mrs Angela Monty and the Deputy Head and DSL, Miss Hannah Lucas.

The School's Recruitment policy is available on request from the School Office at Palmers Green High School, Hoppers Road, London N21 3LJ tel. 020 8886 1135.

### **The Data Protection Act 2018 and GDPR**

The above place duties on the School and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Before sharing data, staff must have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR. Staff need to be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.

Those staff who need to share 'special category personal data' must be aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent; if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The School does not under GDPR, as supplemented by the Data Protection Act 2018, provide pupils' education data where the serious harm test under that legislation has been met. Therefore, in a situation where a child is in a refuge, this could mean that the School can withhold education data under the GDPR and would do so where the serious harm test is satisfied.

Further guidance on information sharing can be found in Working Together to Safeguard Children (WT); Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers; PGHS Data Protection Policy and PGHS Privacy Notice.

[Statutory and other National and Local Guidance can be found in Appendix K](#)

## **Principles of effective safeguarding**

At PGHS it is the responsibility of the Governors and the Senior Management Team to ensure that all staff and volunteers working with PGHS pupils take appropriate steps to:

- protect each pupil from **any** form of abuse, whether from an adult or another pupil;
- support children who are in need of early or additional help or support and to liaise with external agencies in the provision of such help e.g. Child and Adolescent Mental Health Services (CAMHS), through attendance at meetings and through the use of the Common Assessment Framework (CAF) (in Enfield this is known as Enfield Early Help).
- consult with key workers;
- deal appropriately with each suspicion or complaint of abuse;
- design and operate procedures which promote this policy;
- design and operate procedures which, so far as possible, ensure that staff and others are not open to false allegations;
- support children who have been abused, in accordance with an agreed child protection plan;
- be alert to the medical needs of children with medical conditions;
- operate robust and appropriate health & safety procedures;
- ensure that School premises are as secure as circumstances permit;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- ensure that sufficient account is taken of safeguarding issues, such as mental health, body image issues and self-harm, and to facilitate appropriate discussion, support and guidance for pupils and parents across the age range;
- develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area;
- be alert to signs of abuse both in the School and from outside, for example Female Genital Mutilation (FGM); and
- ensure that dealings with pupils are age appropriate, as outlined in staff training sessions.

## **Practical advice for staff and volunteers**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedures. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The DSL and DDSLs have had additional training and can therefore be used as a resource for accessing early help or making referrals. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child. (See *KCSIE 2021* for further information about Early Help).

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Information sharing is vital in identifying and tackling all forms of abuse. If in any doubt about sharing information, staff should speak to the DSL or a DDSL. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Everyone has a duty to help promote the welfare of children and to ensure their needs are being met. This includes where the threshold for a child protection referral has not been met but where a child still needs further help and support through the School's own pastoral and support system.

Although referrals are usually managed by the Designated Staff, **anyone** can refer a child to the LSCP if necessary. A member of staff could be called upon to make a referral therefore all staff should be aware of the process for making referrals along with the role they might be expected to play in such assessments. ([See Appendix B](#) for information about how the LSCP will ensure support for all children including a child in need or a child at risk and also *KCSIE 2021*). In the exceptional circumstance that the Designated Staff are all unavailable, a member of staff should ensure that appropriate action is being taken without delay. They should talk to SMT and/or take advice from the LSCP. In this case, any action taken should be shared with the Designated Staff as soon as is practically possible. Staff should not assume that a colleague or other professional will take action and share information that might be critical in keeping a child safe.

All staff, volunteers and Governors 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.

Where a child is suffering or likely to suffer significant harm, steps must be taken to protect the child immediately through referral to the LSCP or police. Harm may be as the result of omission (for example failure to meet health needs) or through commission (inflicting harm) or neglect. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others for example via the internet.

## Early Help

All School staff should be prepared to identify children who may benefit from early help. (See Chapter 1 of [Working Together to Safeguard Children](#) for further details about early help and how this can be provided.) Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child and/or
- Is persistently absent from education, including persistent absences for part of the school day.

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.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with Enfield LSCP's referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

## What to do if a disclosure is made to you or you suspect that abuse is taking place?

All members of staff have a duty to listen to a child who wishes to disclose information. A child is likely to disclose to someone they trust, and it is important to

recognise that the child has placed them in a position of trust; they should be supportive and respectful of the child. Staff are to provide reassurance (without promising confidentiality) and to record the child's statement. They are not to probe or put words into the child's mouth and must avoid leading questions that may be seen to prompt a child into giving the answer they think you want to hear, (such as 'He touched you, didn't he?'). Staff should always ask 'open questions' which give a child the opportunity to tell you in their own words what may be happening to them in their life. Essential information may also come to light via a child's friend and such referrals must always be taken seriously.

In addition, any member of staff who knows of or suspects an incident of abuse should refer the matter immediately to the DSL or a DDSL. All action must be prompt to avoid any unnecessary delay.

Staff must continue to keep a child's circumstances under review and involve the DSL as required.

[Definitions and possible indicators of abuse are given in Appendix B](#)

**When a child wants to confide in you.**

In any interview with the child please follow the following guidelines: -

- Listen
- Accept
- Record accurately (what did you hear, feel, say) [Appendix C](#)
- **Immediately refer to the Designated Staff**

*In cases of actual or alleged serious harm, the School will immediately inform the LSCP and/or the police.*

#### **DO**

- Be accessible and receptive
- Listen carefully to what the child says spontaneously
- Observe the child's demeanour
- Take it seriously
- Reassure the child that they are right to tell
- Negotiate getting help and find help quickly from the DSL or a DDSL
- Make careful records of what was said immediately and pass to the DSL/DDSL.

#### **DON'T**

- Offer absolute confidentiality or keep secrets
- Jump to conclusions or start an investigation (the duty to investigate rests with other agencies)
- Try to get the child to 'disclose'
- Speculate or accuse anybody
- Make promises you cannot keep
- Confuse physical abuse with normal bruising (e.g. shins/knees).

**Good practice is to LISTEN – RECORD – PASS ON**

## Talking to Children

It is not the responsibility of School staff to **interview** children about alleged abuse or to conduct investigations. That is the role of the LSCP and/or the police who are legally empowered to act and have specialist training in such matters. However, School staff, in particular the Designated Staff, need to make suitable **enquiries** in order to gain **sufficient information** about whether a referral to the investigative agencies is needed or to agree other forms of early help and support.

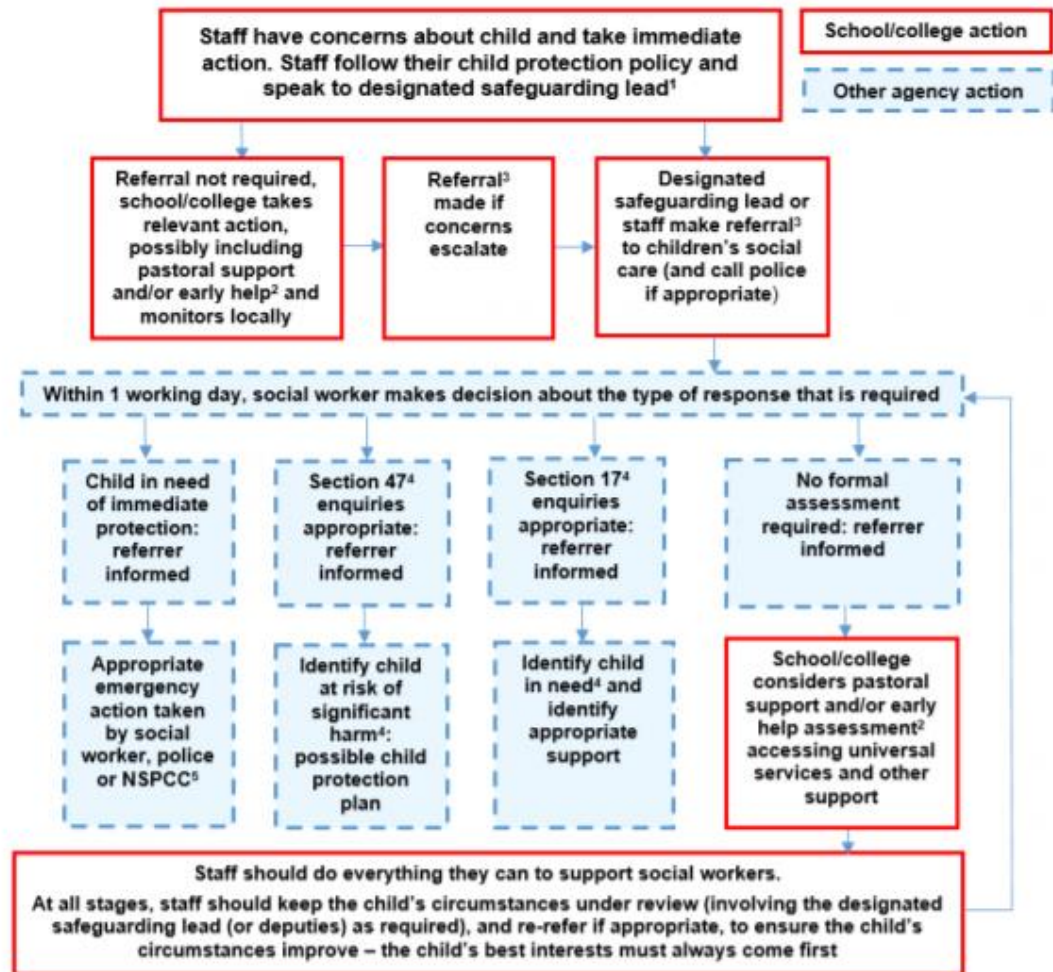
Keep in mind that certain children may face additional barriers to telling someone because of their disability, gender, ethnicity and/or sexual orientation.

Do not ask leading questions and prompt only where necessary with open questions. Using the **TED** technique i.e. "tell me", "explain", "describe", may be helpful when talking to children. Although it is acceptable to record any unusual marks or bruises directly seen on a child in the course of normal activities, such as physical education, and to sensitively ascertain how these may have come about, staff must not trigger an investigation including undressing a child. This is solely a matter for other agencies and specialists. In all such circumstances, a report must be made immediately to the Designated Staff. Should a member of staff see marking or bruising, then the diagram, supplied by the Borough of Enfield, which is on the back of the Incident Reporting Form may be useful in describing what they have seen, **BUT UNDER NO CIRCUMSTANCES SHOULD THEY ATTEMPT TO INVESTIGATE OR UNDERTAKE A PHYSICAL EXAMINATION.**

## What staff should do if they have concerns about a child

If staff (including Governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Child in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.



## **Child suffering or likely to suffer significant harm**

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

## **What staff should do if a child is in danger or at risk of harm**

If staff (including Governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. The School's three safeguarding partners are Enfield Council, NHS Enfield Clinical Commissioning Group and the Metropolitan Police Service. A full copy of their local procedures can be found on their [website](#).

## **What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. Staff are referred to [Appendix B](#) of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

## **What staff should do if they have concerns that children are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

## How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

**DO NOT VIEW OR FORWARD ILLEGAL IMAGES OF A CHILD.** This includes saving images to a computer.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.
- If not, the incident can be handled in School in accordance with the "sharing nudes" guidance and the School's Child Protection and Safeguarding policy and Behaviour policy.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Headmistress. Records will be kept in line with statutory requirements set out in *KCSIE 2021* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the School's normal safeguarding referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they should call Enfield MASH on 020 8379 5555. Advice and support can also be sought from children's social care or via Enfield's Community Service Unit on 020 8379 4085.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect, sexual abuse, and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The School will make daily contact with parents/carers of absent pupils and will report to Enfield a pupil who fails to attend School regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

School staff will also follow the School's EYFS Missing Pupil Policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

### **What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of

the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **What staff should do if a child requires mental health support**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

### **What staff should do if they have safeguarding concerns about another staff member**

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Headmistress. Where there are concerns about the Headmistress, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Chair of Governors, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the LADO at the Enfield Safeguarding Children's Partnership.

### **What staff should do if they have concerns about safeguarding practices in the School**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the policy folder in the Staff Shared area. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing

channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page in [Appendix A](#).

**Remember that if necessary, anybody can whistleblow and make a referral to the external agencies.**

## **Recording Information**

Where there are concerns about a child's welfare, it is essential that accurate, signed and dated records are kept. During the disclosure, staff should make brief notes of what is disclosed and discussed. These initial notes are to be signed, dated and given to the DSL or a DDSL as soon as possible. Within 24 hours the Incident Reporting Form in [Appendix C](#) is to be completed and given to the DSL or a DDSL. Paper copies of the form are available in the Staff Room and an editable word document can be found in the policy folder in the Staff Shared Area.

The records need to document every aspect of the case as it develops, including grounds for initial concern and, where appropriate, descriptions of any marks, or injuries to the child, worrying or changes to behaviour, records of interviews, and any other relevant evidence.

Designated Staff are responsible for collating reports and notes from those involved in the case. The Designated Staff should not necessarily collect further statements from the child, but ask the person who initially listened to the child to record what was said.

## **What happens next?**

The Designated Staff will liaise with and support the LSCP, LADO or the police as appropriate. Other colleagues may be informed, but only if it is felt necessary in order to safeguard the child; the focus is on maintaining strict confidentiality. If the Designated Staff, or any other referrer, feel that there is inaction by the authorities or no improvement in the child's situation, they are to consider following local escalation procedures.

In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and require assessment to see whether additional support and services are required. In some cases, the parents' knowledge and consent to the referral are appropriate, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral might put the child at risk and in individual cases advice from the LSCP team managers will need to be taken.

If it is feared that the child might be at immediate risk of leaving School, take advice from the LSCP. Remain with the child until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has

no right to withhold the child. If there are clear signs of physical risk or threat, the LSCP should be updated and the police should be contacted immediately.

All incidents will be recorded by the Designated Staff following current advice/procedures and **all such information will be kept in a secure, confidential file separate from the child's main school file. Access will be confined to Designated Staff.**

Child protection records are reviewed regularly by the DSL to check whether any action or updating is needed. The DSL must challenge inaction and reassess any cases that require on-going support. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.

When a child transfers schools, their records are transferred within 5 days. If there is child protection material, this is transferred via a physical handover separately and directly to the DSL in the receiving school, with any necessary discussion or explanation taking place. A record is kept of the date of the file transfer and of the person to whom it is transferred. In the event of a child moving out of area or a physical handover not being possible then the most secure method should be found to transfer the confidential records. This would include taking a copy of the files, informing the DSL of the new school that the records are being sent and ensuring that the new school confirms receipt of the files. Files requested by other agencies, for example, the police should be copied.

Information will also be kept of the School's engagement in all promotion of welfare and child protection processes such as referrals to the LSCP/police, CAFs/EHFs, strategy meetings and case conferences.

## **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## **Children with Special Educational Needs and Disabilities**

Children with special education needs and disabilities (SEND) can face additional safeguarding challenges. Staff and volunteers should be aware that additional barriers can exist when recognising abuse and neglect in this group of children. These barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability;

- children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

### **Arrangements for dealing with peer on peer allegations (including child on child sexual violence and harassment)**

Peer on peer abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of School, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

These arrangements apply to all reports and concerns of peer on peer abuse, whether they have happened in School or outside of it, and/or online. Abuse that occurs online or outside of School should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of peer on peer abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also

recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to peer on peer abuse and can recognise the indicators and signs of peer on peer abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children with a designated member of staff. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School has policies and procedures in place to minimise the risk of peer on peer abuse which include Bullying, Behaviour, ICT Acceptable Use and Online Safety policies. There is a robust PSHEE programme of study. Personal mobile devices are not allowed in School.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Enfield LSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview process by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LCSP and/or the police as appropriate. The School will have regard to the procedures set out in *KCSIE* and the Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (*SVSH*) advice at all times.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by



penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the LSCP referral process.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about peer-on-peer abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by an appropriate member of staff and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified, the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headmistress will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour policy.

### **Arrangements for dealing with safeguarding concerns or allegations of abuse regarding teachers including supply staff and other staff (including the Headmistress, Governors, volunteers and contractors)**

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Enfield LSCP arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of School.

Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

When dealing with allegations about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the Headmistress, who will be the 'case manager'. If an allegation is reported to the DSL, the DSL will pass this information to the Headmistress. Where the Headmistress is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Headmistress is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the Chair of Governors and the LADO. However, staff may consider discussing any concerns with the DSL and may make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL (or a Deputy DSL, if the DSL is the subject of the allegation) is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative

to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.
6. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
9. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed

one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

10. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headmistress will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

### **Arrangements for dealing with safeguarding concerns or allegations of abuse about supply teachers and contracted staff**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **Arrangements for dealing with low level concerns or allegations (i.e. that do not meet the harms test) about teachers and other staff (including the Headmistress, Governors, supply staff, volunteers and contractors)**

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The School's Staff Code of Conduct is available to all staff in the policy folder in the Staff Shared area. All staff must sign to acknowledge that they have read, understood and will comply with the information annually. The aim of the Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the DSL or Headmistress without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the DSL, it should be shared with the Headmistress. If the low-level concern relates to the Headmistress, it should be shared with the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the DSL will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing by the DSL or Headmistress. The record will include details of the concern, the context within which the concern arose,

and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the GDPR at all times. The information will be retained for seven years after the individual has left employment at the School.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL (or deputy), and/or the Headmistress. The concern will be recorded in accordance with the School's low-level concern procedure, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### **Ceasing to use Staff, Governors or Volunteers**

If the School ceases to use the services of staff, Governors or volunteers because they are deemed to be unsuitable to work with children a settlement/compromise agreement will not be entered into and a referral will be made to the Disclosure and Barring Service (DBS) as soon as practicable, subject to the criteria for a referral being met. It will be for the DBS to determine any next steps or actions. Any such referrals will also be presented to the Governors without delay to enable them to exercise their oversight duties. The same process will be followed where there is an allegation of concern about conduct towards children and the member of staff, Governor or volunteer tenders their resignation, or ceases to provide a service.

The DBS address for referrals is to be found on the referral form. Telephone Number is 03000 200 190. The website link is

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>.

Where a teacher has been dismissed for professional misconduct, or would have been dismissed had they not resigned, and for whom a prohibition order may be appropriate because he or she is considered unsuitable to work with children, a separate referral will be made to the Teaching Regulation Agency (TRA). See [Appendix D](#) for guidance on handling unfounded or unsubstantiated allegations.



## **The School's Arrangements to fulfil other safeguarding responsibilities**

### **Use of Mobile phones and personal digital devices**

Mobile phones belonging to pupils must be handed in on entry at the beginning of the school day. Mobile phones are not permitted to be used in School – except where their use has been specifically sanctioned by staff for educational purposes during lesson time. Pupils are not allowed to bring personal digital devices such as iPads, smart watches, including Fitbit Charge, to School.

The use of cameras on mobile phones and tablets by staff and pupils is not allowed in School unless officially sanctioned and specifically approved by SMT and in accordance with School policy.

Mobile phone, cameras and tablets are never to be used in changing areas and washrooms.

*Further information is given in the Use of Mobile Devices in EYFS Policy.*

### **Teaching children how to keep safe**

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT and computing curriculum and is also embedded in the PSHEE curriculum.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. These aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials (including advertisements) online; reduce the risk of children being subjected to harmful online interaction with others; restrict access to online risks such as online gambling, phishing or financial scams; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. The School recognises, however, that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography

and other harmful content. Further detail of the School's policy and procedures in relation to online safety can be found in the School's Online Safety Policy and ICT Acceptable Use Agreement. These systems, policies and agreements will be reviewed periodically.

### **Relationships Education and Relationships and Sex Education ("RSE")**

Relationships Education and/or RSE was made compulsory from September 2020. The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education and/or RSE, which form part of the School's PSHEE programme.

### **Looked after children**

The Governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority. Hannah Lucas is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

On arrival, all visitors during the School day are required to sign in at the School Office. They will be issued with a Visitor's lanyard and asked to wear it at all times. Their attention will be brought to the safeguarding information displayed in the entrance foyer. Visitors are to remain under the supervision of a member of staff at all times and escorted back to the School Office at the end of their visit where they must be signed out and their badge returned. Visitors working directly with pupils in unregulated activities will have their identity checked and will not be left

unsupervised at any time. Visitors working in regulated activity will undergo additional checks with the Bursar.

The School shall also keep a formal register of Visiting Speakers retained in line with its Data Protection Policy.

## **Additional arrangements for EYFS**

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and are updated annually during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

## **Notification of parents' and pupils' rights to complain**

Whether or not the School decides to refer a particular complaint to the LSCP and/or the police, the parents and pupil will be informed in writing of their right to make their own complaint or referral to the LSCP or the Child Protection Unit of the police and will be provided with contact names, addresses and telephone numbers.

### **Summary**

This policy should be used in conjunction with the following School policies (available on the School website or from the School Office):

Bullying

Behaviour

Online safety

Use of Mobile Devices in EYFS

Keeping Children Safe In Education (KCSIE, September 2021)

Health and Safety

Missing Child

Recruitment

Staff Code of Conduct

Whistleblowing

Youth-Produced Sexual Imagery (formerly Sexting)

*Continue for Appendices*

## Appendix A - Key External Contacts

<b>BARNET</b> Local Authority Designated Officer (LADO)	020 8359 4066
Multi Agency Safeguarding Hub (MASH)	020 8359 4066 <a href="mailto:MASH@barnet.gov.uk">MASH@barnet.gov.uk</a>
Out of hours Emergency duty team	020 8359 2000
<b>ENFIELD</b> Local Authority Designated Officer (LADO)	020 8379 2850 or 020 8379 4392 <a href="mailto:Safeguardingservice@enfield.gov.uk">Safeguardingservice@enfield.gov.uk</a>
Multi Agency Safeguarding Hub (MASH)	020 8379 5555 <a href="mailto:childrensmash@Enfield.gov.uk">childrensmash@Enfield.gov.uk</a>
Out of hours Emergency duty team	020 8379 1000
Local Safeguarding Children Partnership	020 379 2767
CAMHS Enfield	020 8379 2000 or 020 8360 6771
<b>HARINGEY</b> Local Authority Designated Officer (LADO)	020 8489 2968 / 1031 / 5432 / 3205 <a href="mailto:LADO@haringey.gov.uk">LADO@haringey.gov.uk</a>
Multi Agency Safeguarding Hub (MASH)	020 8489 4470 <a href="mailto:mashreferral@haringey.gov.uk">mashreferral@haringey.gov.uk</a>
Out of hours Emergency duty team	020 8489 0000
<b>HERTFORDSHIRE</b> Designated Officer (previously LADO)	01992 555 420
Multi Agency Safeguarding Hub (MASH)	0300 123 4043
CAMHS Hertfordshire Emergency (8am – 5pm)	01438 845 253 01438 843 322
<b>OFSTED</b> General Enquiries	0300 123 1231 <a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a>
Whistleblowing Helpline Safeguarding Children (Mon-Fri, 8am – 5pm)	0300 123 3155 0300 123 4666 <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>
<b>PREVENT</b> Police Anti-terrorism hotline	0800 789 321
Non-emergency advice for staff / Governors	<a href="mailto:counter-extremism@education.gov.uk">counter-extremism@education.gov.uk</a>
DfE dedicated telephone helpline	0207 340 7264
Local Authority Prevent Lead (support and advice about extremism)	

Enfield (via LA Community Safety Unit)	020 8379 4085/6137 <a href="mailto:sujeevan.ponnampalam@Enfield.gov.uk">sujeevan.ponnampalam@Enfield.gov.uk</a>
Barnet (via MASH)	020 8359 4066
Haringey (via MASH)	020 8489 4470 <a href="mailto:prevent@haringey.gov.uk">prevent@haringey.gov.uk</a>
Hertfordshire (via MASH)	0300 123 4043
Local Police Force	101
In an emergency	999
<b>FGM</b> Local Police Force	101
Helpline for advice	0900 028 3550 <a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a>
<b>FORCED MARRIAGE</b> Forced Marriage Unit	020 7008 0151 <a href="mailto:fm@fco.gov.uk">fm@fco.gov.uk</a>
<b>CONTACT DETAILS FOR NSPCC Whistleblowing advice line for professionals</b> Advice line for anyone concerned about how workplace Child Protection issues are being handled	
NSPCC Whistleblowing Helpline (8am-8pm Mon-Fri)	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
NSPCC 24 hour emergency service	0808 800 5000
<b>NSPCC ABUSE IN EDUCATION</b> Report abuse in education advice line	0800 136 663
<b>DISCLOSURE AND BARRING SERVICE (DBS)</b>	DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF 03000 200 190 <a href="mailto:customerservices@db.gov.uk">customerservices@db.gov.uk</a>
<b>TEACHER REGULATION AGENCY</b>	Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT 0207 593 5393 <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>INDEPENDENT SCHOOLS INSPECTORATE</b>	0207 600 0100 <a href="mailto:concerns@isi.net">concerns@isi.net</a>

## Appendix B - Signs and Types of Abuse

The following is a guide to recognising abuse. It is not exhaustive and staff must avoid falling into the trap of thinking that every child is abused because they happen to fit into one of the criteria outlined. An accumulation of factors may, as part of a comprehensive assessment, support a suspicion of abuse.

- the pupil says they have been abused or asks a question which gives rise to that inference;
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the pupil's behaviour stands out from the group as either being extreme or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour;
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- the pupil's development is delayed;
- the pupil loses or gains weight;
- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- the pupil is reluctant to go home, or has been openly rejected by their parents or carers.

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

## Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.

### Possible signs of Physical Abuse

Hitting, squeezing, biting or twisting a child's arms or legs can cause injuries like bruises, grazes, cuts or broken bones. Sometimes, someone burns a child, perhaps by holding a part of the body against something very hot or by scalding.

Poisoning a child, perhaps by giving them alcohol or drugs, is also physical abuse. Older children may seek to conceal such injuries by keeping their arms and legs covered or being reluctant to change for sport.

Responsible staff need to be especially concerned about:

- Injuries which do not match the explanation given for them
- Bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on the bony prominence
- Bruises which have a distinctive shape or pattern, like hand prints, grasp or finger marks or belt marks
- Burns or scalds with clear outlines
- Bite marks and bruises like love-bites
- Bruising in or around the mouth.

## 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.

### Possible signs of Emotional Abuse

This form of abuse may result in a child becoming withdrawn, nervous, unhappy or lacking in confidence. It may result in a child being unable to make friends, perhaps because they behave aggressively or inappropriately towards other children.

Emotional abuse may happen when a carer behaves in a persistently indifferent or hostile way towards a child, perhaps through bullying, rejecting, frightening, criticising or scapegoating the child. It may happen when a carer's behaviour is



inconsistent so that the child never knows what reaction to expect. It may happen when carers are very possessive or over-protective. In severe cases, children may be subjected to cruel treatment and punishment, like being locked in cold, dark surroundings or being made to do endless, inappropriate household tasks. A child living with domestic violence is also suffering emotional harm.

Responsible staff should be especially concerned about a child who:

- Is continually depressed and withdrawn
- Runs away or who is frightened to go home
- Is persistently blamed for things that go wrong
- Is made to carry out tasks inappropriate to their age
- Is not allowed to do normal childhood activities
- Displays excessive fear of their parents or carers
- Is excessively clingy and tearful

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below for more information) which can occur between two children of any sex (also known as peer on peer abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

### **Possible signs of sexual abuse**

Sexual abuse occurs when someone engages a child in sexual activity, to fulfil their own sexual desires, which the child may not really understand and to which the child is not able to give informed consent. The abuser may use different ways to persuade the child to cooperate such as bribery, threats or physical force.

Sexual abuse can take different forms, from touching to intercourse, and often does not cause any outward signs of physical injury. It can happen to boys as well as girls and to children of any age, from birth to 18 years old. Sexual abuse can have long lasting effects. Some children who have been abused go on to abuse other children. Some find as they grow up that they are unable to have close relationships

with other people. Others deliberately injure themselves because they feel so awful about themselves.

Be especially concerned about a child who:

- Exhibits sexually explicit behaviour
- Has inappropriate sexual knowledge for their age
- Attempts suicide or self-inflicts injuries
- Repeatedly runs away from home

### **Sexual harassment**

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment 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. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the *SVSH* advice.

### **Child-on-child sexual violence and/or harassment**

Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can, however, occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the *SVSH* advice.

### **Sharing of nudes and/or semi-nudes**

The sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media,

gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.

## Upskirting

Upskirting is a criminal offence and typically involves taking 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. Anyone of any sex can be a victim.

## 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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate

supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Possible signs of neglect**

Neglect can result when adults are unable to, or fail to, meet the physical or emotional needs of the children they are responsible for. All children need adequate food, clothing, warmth, love and attention to grow and develop properly. If they do not receive enough of any of these, their growth and development may suffer and they may even become disabled. Children may also be neglected when carers do not ensure that they receive proper medical care.

Responsible staff should be especially concerned about a child who:

- Is constantly hungry, greedy or stealing food
- Has lingering illnesses, which have not been treated
- Is continually smelly, scruffy and dirty
- Is often dressed in inadequate or unsuitable clothing for the weather conditions
- Suffers repeated accidents, suggesting a lack of proper supervision
- Is constantly tired
- Does not respond when given attention or, on the other hand, one who craves attention and affection from any adult.

### **Serious Violence**

Indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from School or permanently excluded from School, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these

### **Specific safeguarding issues**

Behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via peer on peer abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate;

mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

### **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below Child Criminal Exploitation (CCE) indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "Child sexual exploitation: guide for practitioners".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

### **Child criminal exploitation (CCE)**

CCE 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 (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. 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.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children 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.

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

## **County Lines**

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 forms of “deal line”. This activity can happen locally as well as across the UK.

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 be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

## **Modern Slavery**

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

Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (June 2021)"

## Cybercrime

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

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to Call the Police' and National Cyber Security Centre - NCSC.gov.uk

## Mental health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.



If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL (or a deputy).

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

### **So-called 'Honour Based' Violence (including FGM and Forced Marriage)**

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

### **Female Genital Mutilation (FGM)**

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

Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

**If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding**

## **procedures, using existing national and local protocols for multi-agency liaison with police and Children’s Social Care.**

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School’s local safeguarding procedures.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13.] A summary of the FGM mandatory reporting duty can be found here: [FGM Fact Sheet](#).

### **Forced Marriage**

Forcing a person into 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 and any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Some communities use religion and culture as a way to coerce a person into marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if, for example, they have learning disabilities).

There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **Radicalisation and Extremism (‘Prevent’ Duty)**

Radicalisation is defined in the Prevent Strategy as ‘the process by which a person comes to support terrorism and forms of extremism leading to terrorism.’

Extremism is defined in the Prevent Strategy as ‘vocal or active opposition to Fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.’ It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Children are vulnerable to extremist ideology and radicalisation. The School will have due regard to the need to prevent people from being drawn into terrorism. Further guidance can be found in the 'Revised Prevent duty guidance: for England and Wales', 2015. The Government has launched the 'educate against hate' website to provide information, tools and resources to enable people to recognise and address extremism and radicalisation in young people.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. If a member of staff has a concern that a pupil may be at risk, they should follow the School's normal safeguarding procedures, including discussing their concerns with the DSL. The DSL will take advice from the Enfield Prevent Team on **020 8379 6137**.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The Channel police practitioner will make an initial assessment from the information provided. If the young person's needs do not meet the thresholds for support from Channel, they may be directed to safeguarding and support services.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and Governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). The helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm, or a security incident, in which case normal emergency procedures should be followed.

The DSL exercises due diligence in relation to external speakers using the School premises. Each speaker is researched on the internet to establish whether they have demonstrated extreme views/actions. Permission for people or organisations to use the School premises if they have links to extreme groups or movements will be denied.

The School will seek to promote pupil awareness about radicalisation through discussions in PSHEE/RE and other lessons across the curriculum. The aim is to equip pupils with the appropriate capabilities to build personal resilience and develop a positive sense of identity.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL (or Deputy DSL), who should be aware of the local procedures in place, before making a Prevent referral.

## **Possible signs of vulnerability to radicalisation include:**

### **Identity**

- the pupil is distanced from their cultural/religious heritage and experiences;
- discomfort about their place in society;
- personal crisis – the pupil may be experiencing family tensions;
- a sense of isolation;
- low self-esteem;
- a pupil may have dissociated from their existing friendship group and become involved with a new and different group of friends;
- a pupil may be searching for answers to questions about identity, faith and belonging.

### **Personal Circumstances**

- migration;
- local community tensions; and
- events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

### **Unmet Aspirations**

- the pupil may have perceptions of injustice;
- a feeling of failure;
- a rejection of civic life.

### **Experiences of Criminality**

- involvement with criminal groups;
- imprisonment; and
- poor resettlement/reintegration on release.

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

## **Lesbian, gay, bi or trans ("LGBT")**

Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

## **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear,

or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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 gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

### **Homelessness**

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a

referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

### **Children missing education (CME)**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which in turn may include sexual abuse or exploitation and child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

All PGHS pupils are placed on the School's Admission and Attendance registers. School staff should follow the School's procedures for dealing with pupils who are absent, or missing from education, particularly on repeat occasions.

The School has a duty to report certain attendance issues to the local authority: pupils who are regularly absent from School or have missed 10 or more consecutive school days without permission.

The School must notify the local authority when a pupil's name is going to be deleted from the Admission Register at a non-standard transition point, the grounds of which are set out in Regulation 8 of the Education (Pupil Registration) (England) Regulations 2006. These include, but are not limited to; when the pupil has been taken out of School to be home educated; when the family has apparently moved away; when the pupil has been certified as medically unfit to attend; when the pupil is in custody for more than four months or when the pupil has been permanently excluded. The duty arises as soon as the grounds for deletion are met and in any event before deleting the pupil's name.

Where a pupil has not returned to School within 10 school days after authorised absence, or after 20 school days unauthorised absence (in both cases, in the absence of illness or other unavoidable cause) the pupil can be deleted from the Admissions Register when the School and the local authority have jointly made reasonable enquiries as to the pupil's whereabouts and failed.

The School must inform the local authority within five days when a pupil's name is added to the Admission Register at a non-standard transition point.

School staff will also follow the School's EYFS Missing Pupil Policy.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed

by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

### **Children and the court system**

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

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

### **Children with family members in prison**

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

## Appendix C - Incident Reporting Form

<b>Pupil's Name:</b>	<b>Date of Birth:</b>
<b>Date:</b>	<b>Time (of writing this record):</b>
<b>Name (print):</b>	
<b>Signature:</b>	
<b>Job Title:</b>	
<b>Note the reason(s) for recording the incident.</b>	
<b>Record the following factually: Who? What (If recording a verbal disclosure by a child use their words)? Where? When (date &amp; time of incident)? Any witnesses?</b>	
<b>Professional opinion where relevant (how and why might this have happened?)</b>	
<b>Note actions, including names of anyone to whom your information was passed.</b>	
<b>Any other relevant information (Factual)</b>	

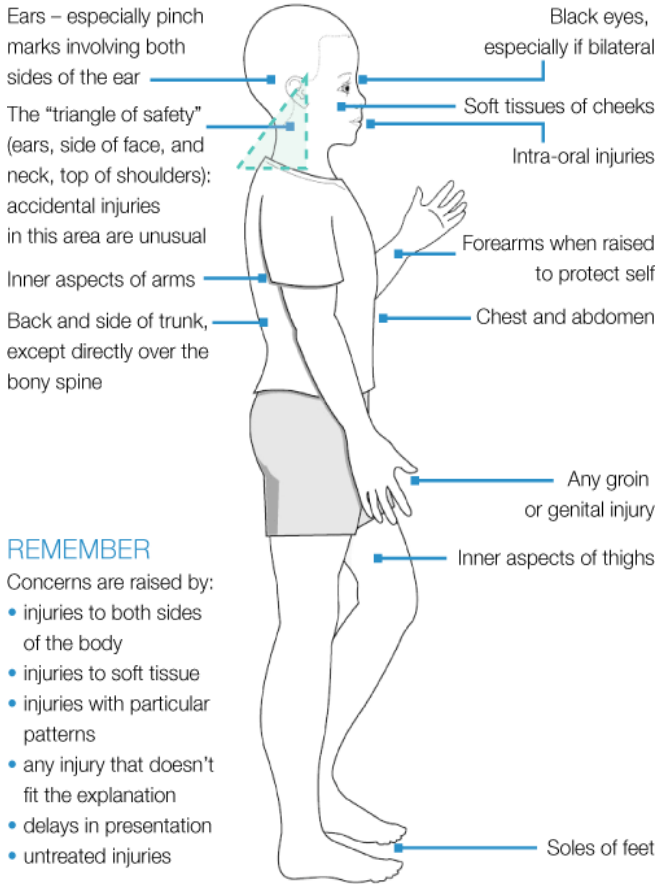
**Check now to make sure your report is clear – and will be clear to someone else reading it next year.**



**NEVER UNDERTAKE A PHYSICAL EXAMINATION OF A CHILD.**

**PLEASE PASS THIS FORM TO YOUR DESIGNATED PON FOR CHILD PROTECTION**

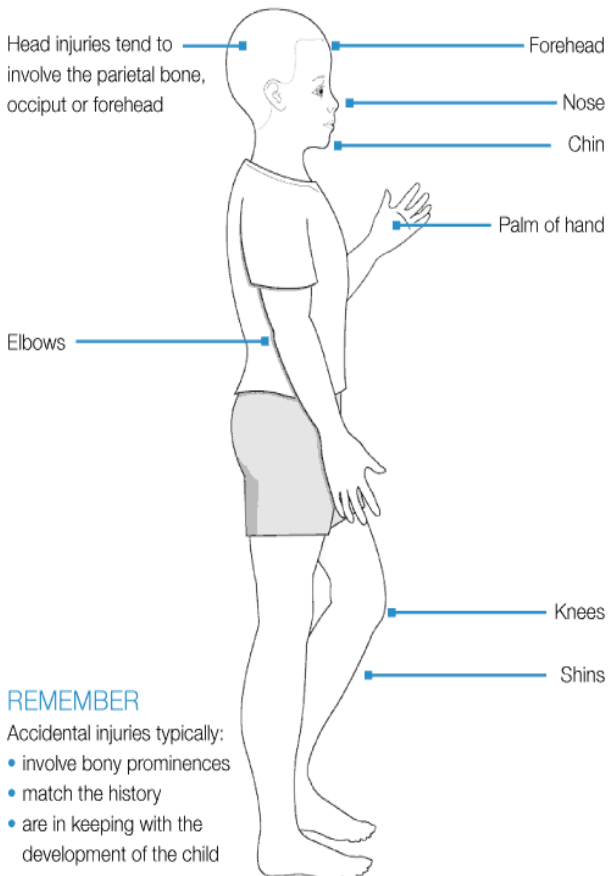
**Typical features of non-accidental injuries (injuries that should raise concerns)**



**REMEMBER**

- Concerns are raised by:
- injuries to both sides of the body
  - injuries to soft tissue
  - injuries with particular patterns
  - any injury that doesn't fit the explanation
  - delays in presentation
  - untreated injuries

**Typical features of accidental injuries**



**REMEMBER**

- Accidental injuries typically:
- involve bony prominences
  - match the history
  - are in keeping with the development of the child

Non-accidental Injuries
<p><b>Bruises likely to be:</b></p> <ul style="list-style-type: none"> <li>• Frequent</li> <li>• Patterned e.g. finger and thumb marks</li> <li>• Old and new in the same place (note colour)</li> <li>• In unusual position (see chart)</li> </ul> <p>Consider:</p> <ul style="list-style-type: none"> <li>• Developmental level of child and their activities</li> <li>• May be more difficult to see on darker skins</li> </ul> <p><b>Burns and scalds likely to be:</b></p> <ul style="list-style-type: none"> <li>• Clear outline</li> <li>• Splash marks around the bum area</li> <li>• Unusual position e.g. back of hand</li> <li>• Indicative shapes e.g. cigarette burns, bar of electric fire</li> </ul> <p><b>Injuries suspicious if:</b></p> <ul style="list-style-type: none"> <li>• Bite marks</li> <li>• Fingernail marks</li> <li>• Large and deep scratches</li> <li>• Incisions e.g. from blade</li> </ul> <p><b>Fractures likely to be:</b></p> <ul style="list-style-type: none"> <li>• Multiple – healed at different time consider:</li> <li>• <u>Age of child always suspicious in babies under two years old</u></li> <li>• Delay in seeking treatment</li> </ul> <p><b>Sexual abuse may result in:</b></p> <ul style="list-style-type: none"> <li>• Unexplained soreness, bleeding or injury to genital or anal area</li> <li>• Sexually transmitted diseases e.g. warts, gonorrhoea</li> </ul>

Accidental Injuries
<p><b>Bruises likely to be:</b></p> <ul style="list-style-type: none"> <li>• Few but scattered</li> <li>• No pattern</li> <li>• Same colour and age</li> </ul> <p>Consider</p> <ul style="list-style-type: none"> <li>• Age and activity of child e.g. learning to walk</li> <li>• May be confused with birthmarks or other skin conditions (e.g. Mongolian blue spot)</li> </ul> <p><b>Burns and scalds likely to be:</b></p> <ul style="list-style-type: none"> <li>• Treated</li> <li>• Easily explained</li> <li>• May be confused with other conditions e.g. impetigo, nappy rash</li> </ul> <p><b>Injuries likely to be:</b></p> <ul style="list-style-type: none"> <li>• Minor and superficial</li> <li>• Treated</li> <li>• Easily explained</li> </ul> <p><b>Fractures likely to be:</b></p> <ul style="list-style-type: none"> <li>• Of arms and legs</li> <li>• Seldom of ribs except for road traffic accidents</li> <li>• Rare in very young children</li> <li>• May rarely be due to 'brittle bone syndrome'.</li> </ul> <p><b>Genital area:</b></p> <ul style="list-style-type: none"> <li>• Injury may be accidental (seek expert opinion)</li> <li>• Soreness may be nappy rash or irritation e.g. from bubble bath</li> </ul> <p>Anal soreness may be due to constipation or threadworm infestation.</p> <p>Parental attitude is important in assessing all of the above – when a child is suffering severe and painful injury most would seek medical help</p>

## **Appendix D - Handling False, Unfounded or Unsubstantiated Allegations**

### **The Child**

A child who has been the centre of false, unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. The School will liaise closely with the LSCP to set up a professional programme that best meets their needs, which may involve the Child and Adolescent Mental Health Services and an educational psychologist. The School will be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that is actually occurring within the child's own family and/or community.

However much support the child may need in such circumstances; the School needs to be sensitive to the possibility that the aftermath of a false or unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the member of staff concerned. In such circumstances, the School may conclude that it is in the pupil's best interests to move to another school. The School would do its best to help them to achieve as smooth a transition as possible, working closely with the parents or guardians.

### **The Member of Staff**

A member of staff could be left at the end of a false, unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun them on the grounds of "no smoke without fire". If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised, the School recognises that they are likely to need professional and/or emotional help. The School will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the School community. A short sabbatical or period of re-training may be appropriate.

## **Appendix E - Guidelines for Staff Conduct**

In addition to the PGHS Staff Code of Conduct this section gives additional advice and clarification regarding interaction with pupils in a variety of circumstances. The Staff Code of Conduct is available in the policy folder in the Staff Shared area.

There has been widespread concern about the increase in false or malicious accusations of child abuse brought against teachers by children and/or their parents. Once an accusation has been made, it must be investigated by the School and the police and child services may be involved, depending on the nature and severity of the alleged offence. The staff (or volunteer) concerned may be suspended from duty or involvement, and people in this situation inevitably feel isolated and powerless.

### **Physical contact with pupils**

A member of staff should never stand in the shoes of the parent to provide physical comfort. Staff should be very wary of any demonstration of affection in the light of the complaints that can be made against school staff. There are situations where physical contact is inevitable and unavoidable with children. The following are some examples of when a member of staff has to respond to a child's own needs:

### **Musical and sporting activities**

In instrumental lessons and during sport, teachers may have to come into close physical contact with a pupil. Wherever possible however, contact should be avoided.

### **Disciplining of pupils**

Corporal punishment had been abolished in all maintained schools by the Education (No 2) Act 1986. The School Standards & Framework Act of 1998 extended this ban to Independent Schools. Staff at Palmers Green High School should never use physical force in the disciplining of pupils, including those in the EYFS.

### **Detention**

After school detentions are held by, or must be approved by, the Headmistress so that appropriate notice can be given to parents and all detentions must be logged. Any transport difficulties and changes to arrangements for the child to be collected, must be taken into account.

Whilst it is unlikely that staff would consider a blanket whole class detention, staff should be aware that such blanket detention of a whole class could result in the member of staff and the School being accused of false imprisonment.

When running a departmental detention, members of staff must liaise with the Head of Department and then seek to:

- Ensure that they are not alone with a pupil in an isolated part of the building

- Hold detentions close to where other adults are nearby
- Never put themselves in a small confined space alone with a pupil.

### **Use of Reasonable Force to avert an immediate danger**

There are circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

When an emergency arises, action must be taken immediately. An example of this is where children are fighting or where a child is acting in a manner that would put others at risk. It is obviously necessary to act quickly in order to avert any risk of danger to other pupils and, if necessary, to prevent any escalation of the violence that may be taking place. Where physical intervention is necessary, it should involve the minimum force/action required to prevent injury to persons and/or damage to property. Where violence is taking place or is about to take place, staff should:

- a) wherever possible, first try to speak with the pupils in an effort to calm the situation;
- b) where violence has begun, a sole member of staff is advised not to intervene unless absolutely necessary but, where possible, to raise the alarm and try to get the assistance of others;
- c) once another member of staff is in the vicinity, then they can attempt to separate the pupils and to calm the situation;
- d) the importance of the presence of another member of staff is twofold: firstly, the two members of staff are a witness to each other's actions if any allegations of assault were subsequently made by pupil or parent, and secondly, another member of staff may reduce a risk of bodily harm.

Where physical intervention has been necessary a record should be made on an Incident Reporting Form. SMT and parents should be informed of the action that took place.

Further advice can be found in the PGHS Use of Reasonable Force policy and at [Use of reasonable force](#)

### **First Aid**

Naturally where immediate First Aid is required it is necessary to act quickly.

Wherever possible when administering First Aid:

- have other pupils/colleagues in the vicinity

- say aloud why you are touching a particular part of the anatomy.

Always record very accurately any First Aid used on the Accident Forms available stating which parts of the body were touched. If at all possible have this witnessed and signed by another adult.

### **School Visits - Self Protection**

Also refer to the Educational Visits Policy. If it is an overnight trip, staff should always try to:

- check rooms in pairs
- avoid taking a child or children into a staff bedroom
- avoid going into the toilet alone with children, but inform another staff member if it is necessary to do so.

When taking children on an outing, be aware of how you appear to the public when dealing with the children. In one county a special needs teacher was reported for 'abusing' a child by a member of the public who misunderstood her actions. This could apply to anyone taking out a group of children. All members of staff should carry identification when on journeys with children.

### **General Guidance on Self Protection**

If a child touches you or talks to you in a sexually inappropriate way or place, record what happened and ensure that the DSL (or a Deputy) is made aware immediately. As it could be a totally innocent touch, do not make the child feel guilty. Be aware that the behaviour might be an imitation of abuse that the child has suffered.

However, remember that ignoring this or allowing it to go on may place you in an untenable situation. Neither is it a good idea for the child to go on doing this as the next person might take advantage and then say the child instigated it.

Do not place yourself in a situation where you are spending excessive amounts of time alone with one child away from other people. If you tutor a pupil, ensure that the door to the room is open. Tell another staff member if you are going to see a child on your own.

Be aware of inappropriate electronic communication with a child. If you have any concerns, refer to the School's ICT Acceptable Use Policy.

Never do something of a personal nature for children that they can do themselves. Be mindful of how and where you touch children (only if absolutely necessary). Be careful of extended hugs (and kisses on the mouth) from children. (This might be particularly relevant to those working with children with special needs.) This guideline is important not only for your protection but for the children as well. If you must physically restrain a child for any reason, be aware that it could be misinterpreted as assault.

Never keep suspicions of inappropriate behaviour or abuse by a colleague to yourself. If there is an attempted cover-up, you could be implicated by your silence.

All incidents of concern must be reported to the DSL (or a Deputy) and an Incident Reporting Form completed.

## **Appendix F - Roles and Responsibilities of the Designated Safeguarding Lead (DSL) and in their absence the Deputy DSL**

**The DSL takes the lead responsibility** for safeguarding and child protection and is the first point of contact for liaison with and the provision of information to the Local Authority. The DSL (or a deputy) will always be available during School hours during term time for staff in the School to discuss any safeguarding concerns. Out of hours, staff can contact the DSL via the staff mobile number used for staff absence reporting. The Headmistress should ensure that policies and procedures adopted are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding; however, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

The role of the Designated Safeguarding Lead and all Deputies includes:

### **Managing referrals to:**

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the police as required.

### **Working with others to:**

- act as a point of contact with the three safeguarding partners;
- liaise with the Headmistress to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four of *KCSIE 2021*) and the LADO(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for all staff; and
- work with the Governors to review and update the School's safeguarding policy.

## **Training**

The DSL (and all deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DSL undertakes additional training in Prevent and Harmful Sexual Behaviours. Training provides DSLs with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the School's Child Protection and Safeguarding policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and



- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measure the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually.

### **Raising Awareness**

- ensure the School's Child Protection and Safeguarding policies are known, understood and used appropriately;
- ensure the School's Child Protection and Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing body regarding this;
- ensure the Child Protection and Safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the School, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

### **Child Protection File**

Where children leave the School (including for in-year transfers) the DSL should ensure their child protection file is transferred to the new school or college within 5 days. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child joining. For example, information that would allow the new school or college

to continue supporting victims of abuse and have that support in place for when the new child arrives.

## Appendix G - Information for Parents

PGHS understands the importance of having good systems for protecting children and safeguarding their welfare during all the activities which the School undertakes. This means that staff and volunteers must be alert to possible concerns about every pupil, and to report these in a proper fashion. The School has a Child Protection and Safeguarding policy.

It is important for parents to be aware that:

- Staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of abuse.
- There are four categories of abuse: physical, sexual, emotional and neglect.
- In some cases, the School is obliged to refer children to the LSCP, for children to be assessed for their needs or if an investigation into possible child abuse is required. In many cases there will already have been discussions between School staff and the parents of the child, and the situation and concerns will not be a surprise to the parents. However, parents may not be told that the School has referred their child to the LSCP if it is thought that this might put the child at risk.
- The LSCP tries to carry out its enquiries in a sensitive fashion. It has to gather information and generally it can be open with parents about the steps being taken.
- If you think your child may have been abused, you can contact the LSCP. If you think the abuse may have happened in School, contact the Headmistress. If you think your child has been hurt, arrange to visit your doctor. Comfort and reassure your child.
- If PGHS staff need to express concerns about a child or refer a child to the LSCP, it is understood that this can cause distress or anger for the child's parents. It is important that all parties – parents and PGHS staff – try to discuss these matters as calmly and sensibly as possible.
- Anyone who has a concern about a child's wellbeing can make a referral at any time.

## Appendix H - Role of the LADO

The role of the LADO is set out in *Working Together to Safeguard Children (2018)* and is governed by the Authorities duties under section 11 of the Children Act 2004 and LSCP Inter-Agency Policy and Procedures. This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self-employed.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist the School in deciding whether there is a need to make a referral and/or take any immediate management action to protect a child.

## Appendix I - Statutory and other National and Local Guidance

A range of documents, circulars and guidance for safeguarding children underpins practice at PGHS. Most importantly, this policy is enacted in accordance with locally agreed inter-agency procedures (London Borough of Enfield). Our local safeguarding partnership, and the one to which the School makes primary contacts for advice and guidance, is Enfield, but because of our wide catchment area we also have established contacts with Barnet, Haringey and Hertfordshire. (see [Appendix A](#) for contact numbers).

Key documents, which inform this policy, include:

- [Keeping Children Safe in Education September 2021](#)
- [The Children Act 1989](#)
- [Working Together to Safeguard Children 2018](#)
- [Disqualification under the Childcare Act 2006 \(September 2018\)](#)
- [What to do if you're worried a child is being abused advice for practitioners \(March 2015\)](#)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(September 2021\)](#)
- [The Prevent Duty \(2015\)](#)
- [Revised Prevent Duty Guidance: for England and Wales \(April 2021\)](#)
- [Counter-terrorism and Security Act 2015 \(and guidance\)](#)
- [Statutory Framework for the Early Years Foundation Stage](#)
- [London Safeguarding Children Board Child Protection procedures](#)
- [Education Act 2002 – Section 157](#)
- [Education \(Independent School Standards\) Regulations](#)
- [Preventing and Tackling Bullying 2017](#)
- [Cyber-bullying: advice for head teachers and school staff \(2014\)](#)
- [Statutory guidance on children who run away or go missing from home or care \(January 2014\)](#)
- [PGHS Staff Guidelines – see Appendix G - Guidelines for staff conduct.](#)
- [Information Sharing 2018](#)
- [Teaching Online Safety in School](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2020\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(December 2020\)](#)
- [Safeguarding and protecting people for charities and trustees \(2019\)](#)