



# Sheen Mount Primary School

## DRAFT Safeguarding and Child Protection

**Policy** (to be approved by FGB)

**(Including Safer Recruitment, Allegations Against Staff and Low-Level Concerns)**

<b>Governors' Committee Responsible</b>	Pastoral
<b>Status</b>	Statutory
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Kingston and Richmond  
Safeguarding Children Partnership

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# 1. Introduction and policy aims

Sheen Mount Primary School has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do at Sheen Mount. We are committed to providing an environment in which children feel welcomed, safe, valued and respected. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

We aim to make sure that

- The school has a clear process in place, which is shared with and followed by all members of the school community when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse, neglect and exploitation such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, pupils, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

# 2. Definitions

**Safeguarding** means the process for protecting children from harm, abuse and exploitation, whether that is within or outside the home, as well as online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop

**Child protection** means the processes carried out to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

**Child** means everyone under the age of 18.

**Parent** means birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Statutory** means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

**The local safeguarding partnership** has three safeguarding partners:

1. the chief of police for a police area in the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding partnership is called the Kingston and Richmond safeguarding children partnership (KRSCP) and considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Wherever local safeguarding arrangements are referred to in this policy, they mean the arrangements agreed and published by KRSCP or the [London Child Protection Procedures and Practice Guidance](#).

Sheen Mount Primary School will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.

### 3. Key personnel

#### Designated Safeguarding Lead (DSL)

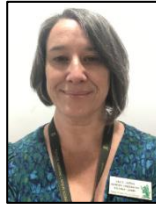


Maria O'Brien  
Deputy Headteacher

[mobrien@sheenmount.richmond.sch.uk](mailto:mobrien@sheenmount.richmond.sch.uk)

[safeguardinglead@sheenmount.richmond.sch.uk](mailto:safeguardinglead@sheenmount.richmond.sch.uk)

#### Deputy Designated Safeguarding Leads



Laura Jeffery  
Assistant Headteacher, Designated  
Teacher for Children Looked After,  
Young Carers and SENDCo

[ljeffery@sheenmount.richmond.sch.uk](mailto:ljeffery@sheenmount.richmond.sch.uk)



Tom Holmes  
Headteacher

[headteacher@sheenmount.richmond.sch.uk](mailto:headteacher@sheenmount.richmond.sch.uk)



Jane McCabe  
Teaching Assistant and Assistant to  
the Inclusion Leader

[jmccabe@sheenmount.richmond.sch.uk](mailto:jmccabe@sheenmount.richmond.sch.uk)

#### Chair of Governors



Susan Boughton

[sboughton@sheenmount.richmond.sch.uk](mailto:sboughton@sheenmount.richmond.sch.uk)

#### Designated Governors for Safeguarding



Jennifer Wright

**Designated Governor for Children Looked After**

[jwright@sheenmount.richmond.sch.uk](mailto:jwright@sheenmount.richmond.sch.uk)

Our Governor lead for Health and Safety is Maria Widdowson, who can be contacted on [mwiddowson@sheenmount.richmond.sch.uk](mailto:mwiddowson@sheenmount.richmond.sch.uk)

To speak with any of the safeguarding leads, please contact the school office on:

020 8876 8394.



Caroline Bones

[cbones@sheenmount.richmond.sch.uk](mailto:cbones@sheenmount.richmond.sch.uk)

## Children's services

Achieving for Children (AfC) single point of access (SPA)

Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the [Single Point of Access \(SPA\)](#) website.

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 020 8547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to on 020 8770 5000.

If a child needs support in the boroughs of Hounslow or Wandsworth please use these numbers: Hounslow **020 8973 3450** or Wandsworth: **020 3513 6631**.

This government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](#)

Go to **section 6** of this policy for in-school procedures.

### Local authority designated officer (LADO)

Every local authority has a legal responsibility to have a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the chair of governors, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)

Telephone: 07774 332675

Online: [Submit LADO referral form](#)

## 4. The law (legislation) and statutory guidance

In addition to KRSCP's arrangements (which can be accessed [here](#)) and the [London Child Protection Procedures and Practice Guidance](#), Sheen Mount Primary School also follows the laws and statutory guidance below:

Keeping Children Safe in Education (<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>), from now on referred to as KCSiE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

[Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) and the [Childcare Act 2006](#) set out who is disqualified from working with children.

[Working Together to Safeguard Children 2023](#) guidance produced by the government states how practitioners, such as teachers, social workers, the police and health professionals working with children and families should work together to make sure that children and young people remain safe from harm.

[Education Act 2002](#), section 175 places a duty on maintained schools and local authorities to keep children safe and promote the welfare of pupils.

[Governance Handbook](#) sets out the roles, responsibilities and legal duties for governing boards and boards of trustees.

The [Children Act 1989](#) is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The [2004](#) amendment is used alongside the Act.

The [Children Act 1989 Care Planning, Placement and Case Review](#) sets out what responsibilities education settings have for children looked after by the local authority.

[The Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

[The Equality Act 2010](#) states that schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our pupils with protected characteristics to make sure their needs are met. The [Equality Act 2010: advice for schools](#) advises us further.

[The Public Sector Equality Duty \(PSED\)](#) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure pupils have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.

Further, and more specific, legislation is covered throughout this policy in the relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we need to make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

## 5. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities.

### **The Governing Board**

The non-statutory [Maintained schools governance guide](#) sets out the roles, responsibilities and legal duties for governing boards.

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- Safeguarding is a standing item on the agenda for governor meetings.
- There is an appointed designated safeguarding lead (DSL) who has appropriate time, resources and funding to carry out their role.
- An experienced governor takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link governor).
- There is an appointed designated teacher for looked after children who is appropriately trained.
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect affecting pupils with special educational needs and disabilities (SEND).
- Child protection files are maintained as set out in Annex C of KCSiE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.



- All staff receive regular safeguarding information, updates and in-depth training.
- Staff sign to say they have read the appropriate part of KCSiE.
- Pupils are taught about keeping themselves and others safe, including when online.
- The board does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a governor to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- There is a procedure in place to identify and address children absent from education, particularly where this is happening repeatedly and there are also safeguarding concerns for the pupil.
- Procedures are in place to manage any safeguarding concerns about staff and how concerns should be reported. The chair of governors will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired/let.
- Alcohol is not consumed by staff on school trips or events on or off site.
- All members of the governing board receive safeguarding training at induction, which is regularly updated.
- All governors sign to say they have read and understood KCSiE and this policy.

#### **The safeguarding link governors – Jennifer Wright and Caroline Bones**

- They meet regularly with the DSL and visit the school asking questions, which allows them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL, DDSLs and headteacher, and make sure it is submitted to the KRSCP.
- They are the governing board's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

#### **The headteacher – Tom Holmes**

- This policy and other safeguarding-related policies and procedures (such as the staff code of conduct) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff receive regular safeguarding training, which is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL is given sufficient time, training, support and resources to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- They become the 'case manager' when an allegation is raised about a member of staff (see Appendix 2) and make the final decision regarding all low-level concerns.
- There are enough staff per child (staff ratios), where relevant and applicable.

## **The designated safeguarding lead (DSL) – Maria O'Brien**

Maria O'Brien has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's leadership team. Sheen Mount has deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to:

- reading and following KCSiE
- always being available during school hours for staff in school to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities
- working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise
- contributing to the assessment of children, including taking part and/or supporting other staff to take part in strategy discussions and meetings between multiple agencies
- working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of Sheen Mount's role in making referrals about suspected abuse, neglect and exploitation
- understanding the importance of sharing information, including referring cases to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) when appropriate, and supporting staff who make referrals directly
- understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements
- keeping the headteacher up to date with safeguarding issues
- having the lead responsibility for online safety, and oversight and checking the effectiveness of filtering and monitoring systems and their reports
- being aware of the requirement for children to have an Appropriate Adult, as described in [PACE Code C 2019](#)
- working with the 'case manager' and LADO for child protection concerns that involve a staff member
- making sure child protection files are up to date and kept as per [section 8](#)
- making sure all staff have access to this policy (and the wider safeguarding procedures) and that the policy is available publicly and reviewed annually
- making sure that all staff (including third-party staff and contractors) have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSiE
- working alongside the governing body and headteacher to update and review procedures and how they are being implemented, including jointly completing an annual safeguarding self-audit and submitting it to KRSCP
- promoting the educational outcomes of pupils who have or had a social worker, by sharing information about child protection issues with teacher and leadership staff

- encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them

**Deputy designated safeguarding leads – Laura Jeffery, Tom Holmes and Jane McCabe**

- are trained to the same standard as the designated safeguarding lead
- will take on the designated safeguarding lead’s responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead.

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL’s responsibilities, see Annex C of KCSiE.

**IT provider**

- maintains the filtering and monitoring systems
- provides filtering and monitoring reports
- completes actions following concerns or checks to the system

**All school staff**

- sign to say they have read the relevant part of KCSiE annually
- have a responsibility to provide a safe environment in which children can learn
- will follow the school’s procedures for identifying and reporting any concerns and issues about the school’s online filtering and monitoring systems
- will follow the school’s safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child’s safety and wellbeing, even when they are unsure
- will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children’s services and LADO
- will create a culture where children who identify as lesbian, gay, bisexual, or transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns
- attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct)

What staff need to know is covered in the training section of this policy.

## 6. What to do if you have concerns about a child's welfare

If staff have any concerns about a child's welfare, they must act on them immediately by following the procedures below. Our staff can use the [What to do if you're worried a child is being abused](#) government guidance alongside the school's procedures. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with, or aware of, safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident you have been involved in.** The names of the DSL and deputies are clearly advertised in the school. Visitors are given a visitor safeguarding leaflet upon signing in.

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

Make a referral to the police and/or children's services **immediately** if a child is in immediate danger, or is suffering or likely to suffer significant harm. **Anyone** can make a referral. Call the police on **999**. For children's services' contact details go to page 6. If you make the referral, you will update the DSL or a deputy as soon as is practically possible.

### Disclosures

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- children may not feel ready or know how to tell someone they are being harmed
- the child may not realise what is happening to them as harmful
- they may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for an individual or family, rather than take what is being said on face value or making assumptions. We encourage staff to ask the pupil if they are OK or if they can help in any way.

A child who makes a disclosure may have to tell their story more than once, such as to the police and/or social workers. At Sheen Mount, we know how important it is that a child's first experience of talking to a trusted adult about a worry they have is a positive one.

### Handling a disclosure

- listen to them carefully and believe in what they are saying. Do not be afraid of silence moments
- be careful not to express your own views or feelings and stay calm
- do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as: "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your evidence (and the child's) in any later court proceedings
- if there are injuries or marks on the child, do not examine the child intimately or take pictures

- reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner
- do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted
- tell the child it is not their fault and you are taking them seriously
- explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help

### **After a child has made a disclosure**

- write up the conversation as soon as possible
- make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible
- do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to
- get support for yourself if you need it

### **Recording a disclosure or safeguarding concern**

- use CPOMs to record the disclosure or safeguarding concern. Where the adult may be a temporary member of staff, they must report the incident to the class teacher and they will follow school procedures
- record the date, time, place and persons present
- use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it
- record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map
- keep any original notes you have made on file by scanning and adding them to the CPOMS entry
- do not ask children to make written statements themselves or sign records

### **Concerns about a child who is NOT in immediate danger, or is suffering or likely to suffer significant harm**

The [flowchart](#) on page 22 explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary.

The DSL and deputy are aware of the [London safeguarding children partnership's threshold document](#), which will be used to inform their response to any safeguarding concern. If you are dissatisfied with the response from the DSL or children's services, you should ask for the decision to be reconsidered, giving your reasons for this. If you remain dissatisfied, follow the local escalation procedure [Resolving professional differences - Kingston and Richmond Safeguarding Children Partnership](#).

## **Early help**

At Sheen Mount, we are keen to work with families to provide support as soon as a problem becomes visible at any point in a child's life. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family – discuss with the relevant Early Help Resilience Network to ensure all identified needs are supported effectively and they get multi-agency support.

Achieving for Children's early help assessment tools and plans can be found [here](#). The partnership's Early Help Strategy sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSiE.

## **Referral to children's services**

Concerns about a pupil or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral the pupil's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The [Resolving professional differences - Kingston and Richmond Safeguarding Children Partnership](#) procedure will be used, where necessary.

## **If a child is at risk of female genital mutilation or it has taken place**

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

## **Teachers**

While all staff should speak to the DSL (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher

must directly report this to the police. This is not the case if it is suspected but not known or if a pupil is at risk of FGM. Teachers will face disciplinary sanctions for failing to do so. The teacher should tell the DSL or a deputy who will support the teacher in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

### **Other members of staff**

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. staff will speak to the DSL or a deputy and follow local safeguarding procedures.

### **Concerns about nudes or semi-nudes**

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a pupil if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the government's [Searching, screening and confiscation: advice for schools](#) guidance.

The DSL will follow the government's [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance. Once they are aware of an incident, the DSL will hold 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.

The initial review meeting will consider the initial evidence and aim to establish

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children's social care
- if it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed
- what further information is required to decide on the best response

- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved that would influence risk assessment
- if there is a need to contact another education setting or individual
- whether to contact parents or carers of the children or young people involved – in most cases they should be involved

The DSL will make an immediate referral to the police and/or children’s services if

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person’s developmental stage, or are violent
- the images involves sexual acts and any pupil in the images or videos is under 13
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, if they are presenting as suicidal or self-harming
- they become aware of a computer-generated indecent image of a child, commonly called ‘deep fakes’ and ‘deep nudes’ i.e. a digitally manipulated or artificial intelligence generated nude or semi-nude

If none of the above applies, we can decide to respond to the incident without involving the police or children’s services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our school’s pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children’s services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children’s services’ involvement, they will make a referral in line with this policy and local safeguarding procedures.

### **Viewing the imagery**

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view imagery, the DSL will be satisfied that viewing

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved



- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child, parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network

### **Deletion of images**

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance.

There is further information in the [Sharing nudes and semi-nudes](#) section of this policy.

### **Child-on-child abuse, including sexual violence and sexual harassment**

Responding to allegations of child-on-child abuse

- You must record the allegation and inform the DSL or a deputy. Do not investigate the allegation.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children's services e.g. the Single Point of Access in Kingston and Richmond.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.
3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.
4. The police will still be informed of any criminal offences, even if the child is aged under the criminal age of responsibility. The police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, any discussions had and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. Depending on the nature of the incident we will offer support through school-based Emotional Literacy Support, seek advice from our Mental Health Support Team (MHST) or the Single Point of Access (SPA).

## Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident based on the Hackett tool (below). We will request the support of other agencies, such as children's services and the police, if necessary.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and social unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual and reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and or sexually arousing to the child carrying out the violent act
Shared decision making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

1. **Hackett Inappropriate:** Manage internally using the behaviour policy and pastoral support.
2. **Hackett Problematic:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. **Hackett Abusive:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. **Hackett Violent:** Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault. We will follow the [When to call the police](#) guidance.

The management of children and young people with sexually harmful behaviour is complex. Sheen Mount will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case by case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- whether there may have been other people impacted by the behaviour
- the person known to be impacted by the behaviour, especially their protection and support
- the alleged instigator of the behaviour
- all pupils (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or from future harm
- the time and location of the incident and any action that can make the school safer

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the pupil 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 services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

### **If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral**

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against the DSL's or a deputy's duty to protect them and other children on a case by case basis. If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. Although the age of criminal responsibility is ten, if the child accused is under ten, a referral to the police will still be made. The police will take a welfare, rather than a criminal justice approach, in these cases.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up which staff need to know and any support which will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the [CPS: Safeguarding Children as Victims and Witnesses](#) advice.

## Concerns about mental health

If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first.

Although you may be 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, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to the Child and Adolescent Mental Health Service's (CAMHS) single point of access for Kingston and Richmond.

## Concerns about extremism and radicalisation

Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. See [radicalisation and extremism](#) in Appendix 1 for more information.

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger**, contact the police on 999 or the anti-terrorist hotline on **0800 789 321**. If the child is not in immediate danger, speak with the DSL or a deputy as a first point of call.

**The DSL** may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and the Channel programme where necessary. The DSL will need to seek the individual's consent when referring to the Channel programme.

**Staff and governors** can also raise concerns relating to extremism directly via the Department for Education's dedicated telephone helpline on 020 7340 7264. You can also raise concerns by emailing [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk), but this is not to be used in emergency situations.

The Prevent leads in Kingston and Richmond are

Kingston:

Stephanie Royston-Mitchell, Community Safety and Resilience Principal [stephanie.royston-mitchell@kingston.gov.uk](mailto:stephanie.royston-mitchell@kingston.gov.uk)

Richmond and Wandsworth:

Naheem Bashir, Hate Crime and Prevent Coordinator [Naheem.Bashir@richmondandwandsworth.gov.uk](mailto:Naheem.Bashir@richmondandwandsworth.gov.uk)

## How pupils can report concerns

In our school, it is essential that pupils can tell us how they are feeling and know we will take seriously anything they share with us. We aim to create an environment full of 'reachable moments' which encourages pupils to feel safe enough to open up if they are concerned about something. Pupils can confidently report any worries they have about their lives, both in and out of school, by

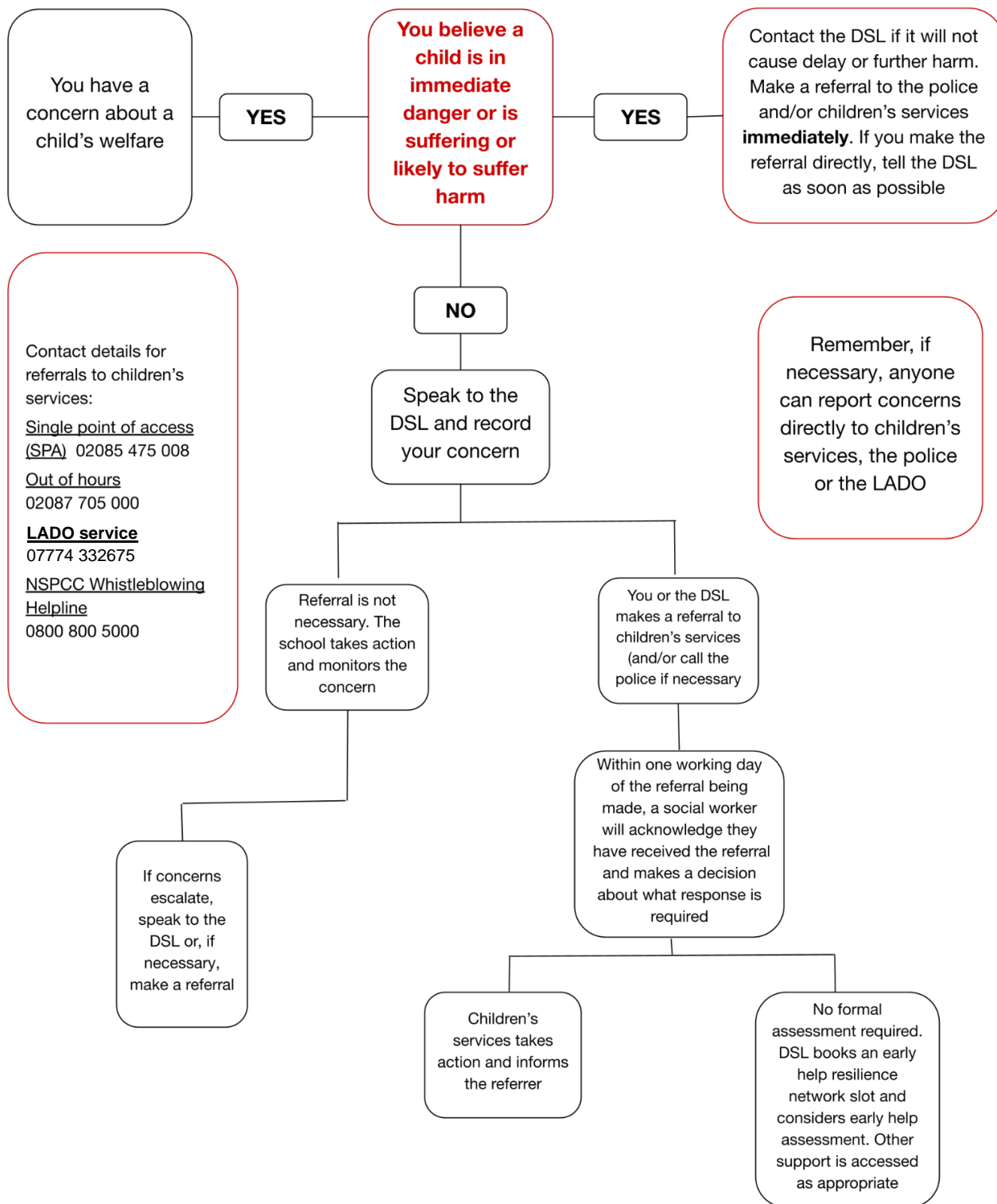
- speaking to an adult they trust
- putting a written or anonymous disclosure in the worry box in their classroom
- putting a written or anonymous disclosure in the worry box under the Safeguarding display board close to the library



Class teachers provide the worry boxes for their classrooms. SLT make reference to the worry box in assemblies and PSHE lessons provide an opportunity for these things to be discussed.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's [voice of the child briefing](#). When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

# Flowchart: what to do if you have concerns about a child



The child's circumstances will be continuously monitored. A re-referral will be made if the child's circumstances worsen or if no improvement is made. If there is a disagreement about the outcome of the referral, the local escalation procedures apply.

## 7. Confidentiality

We take our responsibility to protect and look after the data (information) we hold about pupils and our families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if ‘the safeguarding of children and individuals at risk’ is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government’s [information sharing advice for safeguarding practitioners](#) supports staff who have to make decisions about sharing information. Staff are aware they can look at the [data protection in schools toolkit](#) or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: “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.”

We will share information in a timely manner to keep children safe, which will include sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need to know basis.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child’s safety or wellbeing. Instead, staff should tell the pupil that they may need to pass information on to others who can help and protect them.

### **Notifying parents or carers**

At Sheen Mount, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child’s welfare, and/or we need to request support from other services to make sure the child’s situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children’s services about how and when parents or carers should be updated.

It is legitimate to share concerns without a parent’s or carer’s consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

## 8. Record Keeping

Each pupil has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for these decisions. Records reflect the reason why referrals are or are not made to another agency, such as children’s services or the Prevent programme. Safeguarding files will be stored

securely and access will only be given to those who need it. At Sheen Mount we use CPOMS to store our safeguarding files; staff are able to add entries but only the DSL and Deputy DSLs are able to access the files.

When pupils leave Sheen Mount, the school will make sure that their safeguarding file is transferred to the new education setting or college within 5 days of an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from their main pupil file and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the pupil transferring so support can be put in place ready for when the pupil starts. When a child starts our school, we will make sure key staff are aware of the safeguarding file as soon as possible.

## 9. Concerns or allegations about adults in our school

If you have a low-level concern, or an allegation is made, about a member of staff (see the definition for staff in section 1 of this policy) presenting a risk to children, speak to the headteacher as soon as practically possible. This includes any concerns in school, out of school, online and/or offline.

If the low-level concern or allegation is about the headteacher, contact the chair of governors, whose details are at the start of this policy.

If you are unable to report to the headteacher or chair of governors, either because they are not available or because you believe that there is a conflict of interest, share your concerns with the local authority designated officer (LADO), whose details are at the start of this policy.

Appendix 2 sets out what steps the headteacher or chair of governors will then follow if appropriate.

## 10. Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing and all staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. Sheen Mount has a separate whistleblowing policy, which lists the procedures for raising concerns, this can be found on the school's website.

Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call: 0800 028 0285 from 8am-8pm or email:

[help@nspcc.org.uk](mailto:help@nspcc.org.uk).



## 11. Online safety and the use of smart devices

This section summarises Sheen Mount's whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our Online Safety Policy, which can be found on our school's website. Sheen Mount understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is to

- have in place processes about online safety that protect our children and staff, including how we identify, intervene in and escalate any online concerns where appropriate
- make sure technology is used responsibly and safely through education
- set clear expectations for the use of mobile phones and smart technology

We fulfil our aims by

- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices
- educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging with parents and carers about what online safety looks like
- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to be online safely
- making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement, which covers how they should use the school's IT systems and their mobile and smart technology
- making parents, carers, pupils and staff aware that staff can search an electronic device they have confiscated, as explained in [Searching, Screening and Confiscation - GOV.UK](#)

In addition, see our filtering and monitoring section below.

Due to the constant changes to online technology and the related harms, we will carry out an annual review<sup>1</sup> and risk assessment of our online safety policies, procedures and systems.

### The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

**Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

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<sup>1</sup> Sheen Mount will use the online safety review section in KCSiE to access the appropriate resources to carry out this review.

**Contact:** being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If pupils or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

### **Mobile phones and smart technology (including smart watches)**

We know that, because many children have unlimited and unrestricted access to the internet via mobile phone networks, some children, while at school, can harm others or be harmed by others online. This includes sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is:

- children are **not** permitted to wear Smart Watches which are enabled to take photographs and/or connect to the internet
- children in Year 6 are permitted to bring mobile phones to school, but these **must not** be used whilst on the school site and **must** be handed to their class teacher on entry to the classroom. The phone is kept securely locked away until dismissal at the end of the day
- parents are asked not to video school performances, instead the school makes a recording and shares it securely with parents
- parents are permitted to take photographs at the end of school performances and are asked to **not** share the image using social media

### **Media recordings, audio, image and video (including digital files)**

When we make media recordings of pupils, such as taking videos or photos, we will get the parents'/carers' consent, make sure the pupil is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.

### **Filtering and monitoring**

To limit children's exposure to these categories of risk from Sheen Mount's IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will make sure that

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue
- our governing body review the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe

- the systems are effective for the age range of children and consider children potentially at greater risk of harm
- when we block online content, it does not impact on teaching and learning
- filtering works across all devices including mobile phones and smart technology

### **Remote education**

When our children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- what their child/ren are being asked to do online, including the sites they will be accessing and who from the school will interact with their child/ren
- the importance of children being safe online and offer advice on how to do so
- what systems our school uses to filter and monitor online use

### **Information security and access systems**

We have procedures in place to protect our IT systems, staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's [Cyber security standards guidance](#). Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

## **12. Children potentially at greater risk of harm**

At Sheen Mount, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of those groups of children this applies to; however there are several other groups not listed.

### **Children who have a social worker**

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse and/or neglect and/or complex family circumstances. Sheen Mount recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantage them educationally.

Children's services share with us which pupils have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to our pupils who have a social worker, such as Drawing and Talking or Emotional Literacy Support.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our school works with the Virtual School to support these children.

## **Children looked after and previously looked after**

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Sheen Mount will ensure that staff have the necessary skills and knowledge to keep children looked after, and previously looked after, safe. All staff will have the skills and knowledge to keep these children safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The designated teacher for children looked after is Laura Jeffery. The designated governor for children looked after is Jennifer Wright.

The statutory guidance [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the school has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

## **Children with special educational needs, disabilities and health issues**

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support pupils who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach pupils to keep themselves and others safe, is adapted to meet the needs of pupils with SEND. Learning materials are adapted to enable access for all learners, this may include the use of visuals.

Sheen Mount is aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

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

We offer additional pastoral support for these pupils, which includes

- in-school therapeutic approaches such as Drawing and Talking and Emotional Literacy Support
- liaising and seeking advice with outside professionals such as the school nurse, educational psychologist, speech and language therapist and the mental health support team

## 13. Identified areas of particular risk for our school

We do the following to address our school and local community specific areas of risk:

- monitor the location of behaviour incidents on our school site in order to identify potential areas where pupils may feel unsafe
- recognise that as we have a high number of children with Education, Health and Care Plans and that some of these children may have difficulty communicating when they do not feel safe
- make our neighbourhood police aware of any information of concern we receive about the local area via our school safety officer

## 14. Lettings and off-site arrangements

When services or activities are provided by the governing body, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are pupils at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's [Keeping children safe during community activities, after-school clubs and tuition](#) non-statutory guidance. This includes checking that they complete the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

### **Extended school and off-site arrangements**

Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply. When our pupils attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our pupils attend an alternative provision provider, we continue to be responsible for their safety and wellbeing and will satisfy ourselves that the placement can meet the child's needs. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform on our own staff. We follow the [statutory guidance for alternative provision](#) and [Achieving for Children's alternative provision policy](#).

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

## 15. Training

### Designated safeguarding lead

The designated safeguarding lead will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. Minimally, the designated safeguarding lead will

- attend the level 3 multi-agency local safeguarding partnership training within 12 weeks of starting this role and refresh this every two years
- stay up to date with safeguarding knowledge, resources and changes
- have a good understanding of, and form a good relationship with, the Kingston and Richmond safeguarding children partnership by attending the termly DSL forums, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer
- attend harmful sexual behaviour and Prevent awareness training
- receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff
- make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity
- gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at Sheen Mount Primary School.

### Governors

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be regularly updated. Further,

- The governing body will make sure the designated safeguarding lead has the time and resources to attend training.
- The chair of governors will receive training about managing allegations against the headteacher to assist them in the eventuality that an allegation is made.
- The governing body will make sure that online safety is a theme in all staff training.
- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The link safeguarding governor will make sure that staff and governors attend safeguarding training at induction and regularly after that. The link safeguarding governor will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.

The governing body will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. Sheen Mount has a separate safer recruitment policy, which explains what safeguarding checks are completed before employment to make sure those who work with children are suitable. This policy is available upon request.

## All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive safeguarding and child protection training (including online safety) at induction. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annually, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

Our training ensures that staff:

- can spot the signs of possible abuse, neglect and exploitation
- know the school's safeguarding procedures and their role in carrying them out
- have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral
- know what to do if a child tells them they are being harmed, including how to manage this information confidentially
- understand the reasons why children may not feel ready or know how to tell someone that they are being harmed
- receive Prevent training, which will prepare them for identifying children at risk of being drawn into terrorism and how to challenge extremist ideas
- understand what cyber security the school has in place to keep pupils and staff safe when online at school and how to report any issues
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues
- know that children who identify as or are perceived be LGBT can be targeted by other children

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

The headteacher will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

## The designated teacher for children who are looked after (CLA)

We follow the [Role and responsibilities of the designated teacher](#)'s statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with AfC's [Virtual School](#), accessing their training and forums to stay up to date.

## 16. Teaching and Learning

At Sheen Mount, we aim to prevent our pupils from coming to any harm. We recognise how important it is that we teach and role-model to pupils how to keep themselves and others safe. Our curriculum meets the needs of all pupils, such as pupils with SEND and pupils who have been abused. Safeguarding is included in all areas of teaching and learning, for example PSHE, computing, assemblies, circle time. Staff will follow school procedures if a disclosure is made during any lesson.

If specific safeguarding issues arise during the school year, the headteacher will make sure the curriculum is adapted to cover current issues.

## 17. Linked policies

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents can be found below:

- Positive Behaviour and Relationships
- Staff behaviour code of conduct
- Whistleblowing
- Recruitment and Selection
- Health & safety
- Acceptable IT Use
- Attendance
- Curriculum (such as PSHE and RSE)
- Supporting pupils with medical needs
- Online safety
- Intimate care



## Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSiE guidance.

**Abuse** is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing or experiencing the effects of domestic abuse. We are 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. Our staff will be aware that technology is a significant part of many safeguarding issues.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

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

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

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

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

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

We use the following guidance to help identify and address cases of neglect.

[Handling Cases of Affluent Neglect in Schools](#)

[Local partnership guidance](#)

Indicators of abuse

The following list, provided by the [NSPCC](#), covers some common indicators of abuse and neglect.

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- patterns of repeated lateness or absence

**It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

### **Specific safeguarding concerns**

This section is based on Annex B of Keeping Children Safe in Education 2023. Annex B includes further information about other safeguarding issues to be aware of. **All concerns under this section should be addressed in line with Section 6 of this document, unless stated otherwise.**

### **Children absent from education**

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called

'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at Sheen Mount to support us in identifying abuse and acting early. Our staff will be aware of our schools unauthorised absence procedures and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. We make sure we have more than one emergency contact number for each pupil, which supports the school's procedure for addressing children missing and absent from education. We work in partnership with Achieving for Children when patterns of absence give rise to concern, including notifying them when a pupil leaves our school without a new school being named.

Our attendance policy and procedures are set out in a separate document, which can be requested. The school follows the government's [Working together to improve school attendance](#) guidance.

Useful links:

[Local partnership guidance](#)

[Children Missing Education statutory government guidance](#)

### **Contextual safeguarding**

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Sheen Mount will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with AfC's [contextual safeguarding team](#).

If there is a specific concern about a child, we will consult with the relevant children's services.

Useful links:

[Local partnership guidance](#)

[Achieving for Children Risk Outside the Home](#)

[Tackling Child Exploitation multi-agency Practice Principles](#)

### **Child sexual exploitation (CSE) and child criminal exploitation (CCE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. 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, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

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

CSE is a form of child sexual abuse which can affect any child. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who

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

See the [Sharing nudes and semi-nudes](#) section below for details about 'sextortion'.

Sheen Mount follows the London Child Protection Procedures regarding [sexual exploitation](#). Further information on signs of a child's involvement in sexual exploitation is available in Home Office's [Child sexual exploitation: definition and guide for practitioners](#).

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

At Sheen Mount, we recognise children involved in CCE are victims, despite their engagement in crime. A child may still have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

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.

CCE can include children being forced and/or manipulated

- to work in cannabis factories
- into moving drugs or money across the country (county lines)
- to shoplift or pickpocket
- to threaten serious violence to others
- into committing vehicle crime

## **Serious violence**

Staff at Sheen Mount will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- 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 are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as

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

Useful links:

[Preventing youth violence and gang involvement government guidance](#)

[Criminal exploitation of children and vulnerable adults: county lines government guidance](#)

## **School-related weapons incidents**

Sheen Mount follows the AfC School Related Weapons or Potential Weapons Incidents Protocol. We will inform children's services and the police of any incident involving a weapon or potential weapon. Our teachers have the legal power to search pupils without consent for a number of 'prohibited items', including weapons covered in the government's [Searching, screening and confiscation](#) guidance.

Sheen Mount recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. Sheen Mount will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

## **Children who run away or go missing from home or care**

Sheen Mount recognises that children who run away, go missing or are absent from their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance [Children Who Run Away or go Missing from Home or Care](#) requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with Achieving for Children or other relevant local authority, Sheen Mount will facilitate RHIs, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place. We will follow the Kingston and Richmond Safeguarding Children Partnership's [Missing children](#) procedure when required.

## **Mental health**

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. Sheen Mount recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. Sheen Mount aims to promote positive mental health for all staff and pupils. To do so, we take into account the government's [Mental health and behaviour in schools guidance](#). Our mental health lead is: Paula Teeling

We provide the following mental health support at school:

- Drawing and Talking Therapy
- Emotional Literacy Support
- Drop-ins with our school nurse
- Mental Health Support Team (MHST) 1:1 direct work or groups

Referrals are made, with parental consent, through Paula Teeling

Useful links:

[Local partnership guidance](#)

[Mind](#)

[NSPCC: Child mental health](#)

## **Domestic abuse**

Domestic abuse can include a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The [Domestic Abuse Act 2021](#) states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

Sheen Mount has signed up to the police initiative [Operation Encompass](#), a system which ensures that when police are called to an incident of domestic abuse and a child/children in the household experienced the incident, the police will inform the DSL in school before the child or children arrive at school the following day. Once informed, the DSL or a deputy will provide silent support according to the child's needs and update records about their circumstances.

Useful link:

[Local partnership guidance](#)

## **Homelessness**

Sheen Mount recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

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

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to

- bullying (including online bullying, prejudice-based and discriminatory bullying)

- abuse between children in an intimate relationship
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online)
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online)
- sexual harassment, such as sexual comments, jokes and online sexual harassment#
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

Older pupils may use any of these types of child-on-child abuse to ‘recruit’ younger pupils into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to ‘recruit’ other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to be impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Sheen Mount does not tolerate child-on-child abuse. We know that even when there are no reported cases of child-on-child abuse, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. For pupils to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- our staff read this policy
- our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that ‘it could happen here’
- our staff challenge any inappropriate behaviour between children, including the use of derogatory language
- the Positive Behaviour and Relationships policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when pupils show unacceptable or abusive behaviour
- in all areas of school life, such as lessons, assemblies and in the playground, we teach pupils how to act and to treat other people, including when they are online
- we have effective systems in place for pupils to report child-on-child incidents

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

Our school is aware of Ofsted’s [Review of sexual abuse in schools and colleges](#). The review was carried out as a result of the large amount of testimonies shared on the [Everyone’s Invited](#) website, which highlighted the prevalence of sexual harassment and sexual violence.



We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exists on a continuum and may overlap. They are never acceptable and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening here at Sheen Mount.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND
- pupils who are LGBT+ or who are perceived to be LGBT+ by their peers

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of safeguarding.

Sheen Mount follows Part 5 of KCSiE when considering our response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of this policy.

### **Harmful sexual behaviours (HSB)**

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. Sheen Mount recognises that pupils displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputies will

- have a good understanding of HSB
- assist in planning the curriculum aimed at preventing HSB
- ensure staff spot and report inappropriate behaviour to prevent an escalation

- incorporate our approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding

Sheen Mount’s curriculum addresses these issues via the following topics according to the age and stage of development of our pupils:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:

[Local partnership guidance](#)

[NSPCC Harmful Sexual Behaviours](#)

[Stop it Now](#)

### **Upskirting**

Sheen Mount will ensure that all staff and pupils are aware that ‘upskirting’ is a criminal offence and will not be tolerated. The [Criminal Prosecution Service \(CPS\)](#) defines ‘upskirting’ as: “a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission”.

Sheen Mount will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police, as required.

### **Sharing nudes and semi-nudes**

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 ([UKCIS, 2024](#)). Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’. It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of them or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don’t do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the [alert guidance](#) and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

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

So-called 'honour'-based abuse (HBA) means 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. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

## **Female genital mutilation (FGM)**

Female genital mutilation (FGM) means 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. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

**Section 6 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.**

Signs that FGM might happen:

- a relative or someone known as a 'cutter' visiting from abroad
- a special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'
- a female relative, like a mother, sister or aunt has undergone FGM
- a family arranges a long holiday overseas or visits a family abroad during the summer holidays
- a girl has an unexpected or long absence from school
- a girl struggles to keep up in school.
- a girl runs away – or plans to run away - from home ([NSPCC](#)).

Signs FGM might have taken place:

- having difficulty walking, standing or sitting
- spending longer in the bathroom or toilet
- appearing quiet, anxious or depressed
- acting differently after an absence from school or college
- reluctance to go to the doctors or have routine medical examinations
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed ([NSPCC](#))

Useful information:

[Female Genital Mutilation Statutory Guidance](#)

[Local partnership guidance](#)

## **Forced marriage**

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:

[Freedom charity](#)

[Handling cases of forced marriage guidance](#)

[National FGM Centre](#)

## **Modern slavery**

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes:

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful information:

[Modern slavery: how to identify and support victims](#)

## **Private fostering**

A private fostering arrangement is when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as

step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

Sheen Mount is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

Useful links:

[Looking after someone else's child](#)

[Local partnership guidance](#)

### **Preventing radicalisation and extremism**

While some children are more susceptible, any child can be radicalised into terrorism. We take seriously our [statutory duty](#) to protect children from being drawn into terrorism and extremism.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

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

**Terrorism** is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system

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

To prevent children from being drawn into radicalisation, we make sure:

- our filtering and monitoring systems will prevent and protect children from accessing extremist material
- pupils are taught about British Values and staying safe online via the curriculum
- pupils are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views
- staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible
- the DSL attends Prevent awareness training and is aware of the latest guidance
- we perform a risk assessment assessing how our pupils or staff may be at risk of terrorism (including online) using the counter terrorism local profile and updates from the local partnership

The [Educate against hate](#) government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

Useful links:

[Local partnership guidance](#)

[Protecting children from radicalisation: the prevent duty](#)

### **Child abuse linked to faith or belief**

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non-emergency, 24/7 number: 101.

Useful links:

[Metropolitan Police advice](#)

[Short Youtube introduction video](#)

### **Fabricated or induced illnesses**

Staff at Sheen Mount are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting pupils with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:

[The Royal College of Paediatrics and Child Health \(RCPCH\) guidance](#)

## Appendix 2: Safer Recruitment, Allegations against staff and low-level concerns procedure

# Safer recruitment

### Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### Advertising

When advertising roles, we will make clear:

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

### Application forms

Our application forms will:

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

### Shortlisting

Our shortlisting process will involve at least 2 people and:

- will consider any inconsistencies and look for gaps in employment and reasons given for them
- will explore all potential concerns

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

- complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - if they have a criminal history
  - whether they are included on the barred list
  - whether they are prohibited from teaching



- information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- any relevant overseas information
- . Sign a declaration confirming the information they have provided is true

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

### **Seeking references and checking employment history**

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

When seeking references we will:

- . not accept open references
- . liaise directly with referees and verify any information contained within references with the referees
- . ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- . obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- . secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- . compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- . resolve any concerns before any appointment is confirmed.

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

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

### **New staff**

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

- . verify their identity

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

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

**Regulated activity** means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

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

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

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

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

## **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **Contractors**

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

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

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

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

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

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

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

## **Trainee/student teachers**

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a

record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

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

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

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

### **Staff working in alternative provision settings**

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

### **Adults who supervise pupils on work experience**

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

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Allegations against staff (including low-level concerns) procedures**

Sheen Mount has a whole school approach to safeguarding and we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Despite all efforts to recruit safely, there may be occasions when allegations of abuse against children are reported to have been committed by staff, supply staff, practitioners and/or volunteers, who work with pupils in our school.

An allegation is any information which indicates that a member of staff, supply staff or volunteer may have:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child that the member of staff, supply staff or volunteer has contact with in their personal, professional or community life, as if they had child protection concerns raised for their own children.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the 'Guidance for safer working practice for adults who work with children and young people in education settings'

[Guidance for safer working practice for those working with children and young people in education settings February 2022](#)

All school staff should take care not to place themselves in a vulnerable position with a pupil. It is always advisable for interviews or work with individual pupils or parents to be conducted in view of other adults.

We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or being aware of the information, will immediately inform the headteacher or the DSL.

On all such occasions, the headteacher or the DSL will discuss the content of the allegation with the local authority designated officer (LADO) within 24 hours and before taking any further action.

If the allegation made to a member of staff concerns the headteacher, the person receiving the allegation will immediately inform the chair of governors who will consult the LADO as above, without notifying the headteacher first. Contact details for the chair of governors can be found in section 2 of this policy.

Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to children in their own families. For example, a report of a child being smacked by a parent, with no injury caused, would be unlikely to require any response by police or Children's Social Care. However, a similar report of a child being smacked by a teacher should be responded to because of:

- the vulnerability of children away from home
- the higher standards of conduct demanded by law and regulation of those caring for other people's children
- the position of trust enjoyed by such people.

Sheen Mount will follow the London child protection procedures for managing allegations against staff [London child protection procedures: allegations](#) and procedures set out in [Keeping Children Safe in Education 2022](#)

If an allegation pertains to another adult not employed directly by the school, for example catering staff, cleaning staff, peripatetic teachers, sports coaches or a former member of staff, the school will work directly with the employing agency and the LADO as described above.

## **Section 1: allegations that may meet the harms threshold**

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

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

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

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

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

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

### **Suspension of the accused until the case is resolved**

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

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

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

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

#### **Definitions for outcomes of allegation investigations:**

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

#### **Procedure for dealing with allegations**

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

- conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **if immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **if it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **if it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

#### **Additional considerations for supply teachers and all contracted staff**

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

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

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

#### **Timescales**

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

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



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

## **Specific actions**

### **Action following a criminal investigation or prosecution**

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

### **Conclusion of a case where the allegation is substantiated**

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

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

### **Individuals returning to work after suspension**

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

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

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

- who needs to know about the allegation and what information can be shared

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

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

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

### **References**

When providing employer references, we will:

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

### **Learning lessons**

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

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

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

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

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

## **Section 2: concerns that do not meet the harm threshold**

This section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. It applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – 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 work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Concerns may arise through, for example:

- suspicion
- complaint
- safeguarding concern or allegation from another member of staff
- disclosure made by a child, parent or other adult within or outside the school
- pre-employment vetting checks.

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

### **Definition of low-level concerns**

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- being overly friendly with children
- having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils
- using inappropriate sexualised, intimidating or offensive language.

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. Staff can refer their concerns to the DSL or one of the deputy DSLs.

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns
- empowering staff to self-refer
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping to identify any weakness in the school's safeguarding system.

### **Responding to low-level concerns**

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record keeping**

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

Records will be:

- kept confidential, held securely and comply with the Data Protection Act 2018 and UK GDPR
- reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- retained at least until the individual leaves employment at the school.

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

### **References**

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

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

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

- being over friendly with children
- having favourites
- taking photographs of children on staff's personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

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.

The culture of our school is such that staff are encouraged to pass on low level concerns to the DSL or the headteacher. These concerns will be recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of the school from potential false allegations or misunderstandings.