



# **CHILD PROTECTION POLICY AND PROCEDURES (SAFEGUARDING)**

<b>GB Committee Responsible:</b>	<b>Board of Director</b>
<b>Reviewed by:</b>	<b>Debbie Ferrer</b>
<b>Review Date:</b>	<b>October 2025</b>
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<b>Next Review Date:</b>	<b>January 2026</b>



## Safeguarding Team Contacts at *Bentley Wood High School*

Role:	Name and contact details:
Designated Safeguarding Lead (DSL)	Debbie Ferrer
Deputies DSL(s)	Jahnvi Manzi, Naseema Akbar
Named safeguarding governor	Matt Dukes
Chair of Governors	Raakhi Patel
School online safety Lead	Hary Ilanko
Designated teacher for Children in Care and children previously in care (CiC)	Debbie Ferrer
Senior Mental Health Lead	Francis O Sullivan
Prevent Lead	Debbie Ferrer
Protective Security and Preparedness Lead	Paola Boyadjian

### **This Policy is informed by the following:**

- DfE: [Keeping Children Safe in Education 2025](#)
- DfE: [Working Together to Safeguarding Children](#) 2023
- [Serious Crime Act 2015](#)
- [The Prevent Duty](#),
- [Glossary of Terms](#)
- DfE: [Use of reasonable force in schools](#),
- DfE: [Mental Health and Behaviour in Schools](#), November 2018
- DfE: [Teaching Online Safety in Schools](#), updated 12<sup>th</sup> January 2023
- [Working together to improve school attendance](#) (August 2024)
- DfE: [Searching, screening and confiscation at school](#), July 2022
- [Relationships Education, Relationships and Sex Education \(RSE\)](#)
- [Generative Artificial Intelligence \(AI\) in Education](#)
- DfE: [Meeting digital and technology and standards in Schools and Colleges](#), March 2023
- [What to Do If You're Worried About a Child being abused](#)
- UK Safer Internet Centre: [A Guide for Education Settings and Filtering Providers](#), June 2022
- [Domestic Abuse Act](#), 2021
- [Special Educational Needs and Disability code of Practice: 0-25 Years](#)
- OFSTED – [Review of sexual abuse in schools and colleges](#) (June 2021)
- [Marriage and Civil Partnership \(Minimum Age\) Act 2022](#)
- [Multi-agency statutory guidance for dealing with forced marriage](#) (July 2022)
- [Sharing Nudes and semi-nudes: advice for education settings working with children and young](#)

- [people](#) (UKCIS December 2020)
- [The Equality Act 2010](#)
- [Human Rights Act 1988](#)
- [Online Harms Bill](#),
- [PACE C code 2019](#) (Appropriate Adult Guidance)
- [Education Against Hate](#)
- [Multi-agency statutory guidance for dealing with forced marriage July \(2022\)](#)
- [County Lines: Toolkit for Professionals](#)
- [Marie Collins Foundation: Sexual Abuse Online](#)
- [Multi-Agency Statutory Guidance on Female Genital Mutilation](#)
- [Supporting Young People who have Suffered from Sexual Abuse](#)
- [Lucy Fathfull Foundation Shore Space](#)
- Summary of responsibilities where a mental health issue is affecting attendance and examples of effective practice

**And should be read in conjunction with the following Policies:**

- Allegations of Abuse Against Staff
- Supporting Students with Medical Conditions
- IT
- Anti-Bullying
- Behaviour for Learning, Exclusion and Suspension
- Bentley Wood High School Suite of HR Policies
- Attendance and Punctuality
- Health and Safety Policy
- Preventing Extremism and Radicalisation
- Relationships and Sex policy
- Young Carers
- Whistleblowing (from the Suite of HR Policies)
- British Values Statement
- Equality information and objectives
- Inclusion Policy

***The following policy and procedure apply to all governors, staff and volunteers working in our school. We also ensure contractors are aware of the child protection policy and the school take the same responsibilities as they do for staff, volunteers and agency staff.***

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# Bentley Wood High School: Child Protection and Safeguarding Policy

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Keeping Children Safe in Education 2025.

## 1. Ethos statement

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children. We aim to provide a safe and welcoming environment in which children can learn, underpinned by a culture of openness where both children and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe.

## 2. Introduction

The governing body/proprietor<sup>1</sup> recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Harrow Safeguarding Children's Board.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

Safeguarding and promoting the welfare of children is defined as:

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

This policy is for all staff, parents, governors, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school (*school to include appendix detailing school specific linked policies and procedures*). In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, Online Safety Policy, Behaviour and , Preventing Extremism, Anti-

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<sup>1</sup> In maintained schools the governing body is responsible for ensuring their functions are exercised with a view to safeguarding and promoting the welfare of children in accordance with section 175 of the Education Act 2002, for pupil referral units it is the management committee, in independent schools, including academies and free schools, and 16-19 academies, this duty sits with the proprietor (in the case of academies the proprietor will be the academy trust). References to the governing body throughout this policy framework includes management committees.

Bullying Policy, school's guidance on low-level concerns<sup>2</sup>, Child-on-Child Abuse Policy and procedures, and Part Five of KCSiE, copies of which will be provided to all staff on induction.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people, and ensure that all staff understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The governing body/proprietor expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working directly with children **must**, as a minimum, have read and understand [Part One of KCSiE](#) and [Annex B](#). Governors/the proprietor will ensure that they and senior leaders have read and understand [Parts One and Two of KCSiE](#). The governing body/proprietor will ensure that those staff who do not work directly with children have read either Part One or Annex A of KCSiE<sup>3</sup> together with Annex B. There may some staff whom the governing body/proprietor require they read additional sections<sup>4</sup>.

The governing body/proprietor will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated. The governing body/proprietor will ensure that all governors and trustees receive appropriate safeguarding and child protection training (including online) at induction which is regularly updated.

Compliance with the policy will be monitored by the Headteacher, designated safeguarding lead (DSL) and named safeguarding governor/proprietor.

### 3. Statutory framework

Section 175 of the Education Act 2002 (as amended) in the case of maintained schools and pupil referral units<sup>5</sup>, Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools (including academies and free schools), the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) for post 16 education providers, place a statutory duty on governing bodies and proprietors to have policies and procedures in place that safeguard and promote the welfare of children and young people who are pupils of the school which must have regard to any guidance given by the Secretary of State.

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<sup>2</sup> Guidance on Low-Level Concerns may be a stand alone policy or included within another policy e.g. Staff Code of Conduct

<sup>3</sup> Annex A of KCSiE is a condensed version of Part One of KCSiE. Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular direct contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read Annex A which is the condensed version of Part One of KCSiE.

<sup>4</sup> The governing body/proprietor may decide that for some roles should read additional parts of the guidance e.g. colleagues involved in safer recruitment administration including the maintenance of the single central record should also read Part Three of KCSE.

<sup>5</sup> Section 175, Education Act 2002 – for management committees of pupil referral units, this is by virtue of regulation 3 and paragraph 19A of Schedule 1 to the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007

In accordance with statutory guidance, Working Together to Safeguard Children 2023, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint duty for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Harrow, all schools have been named by the Harrow Safeguarding Children's Board (HSCB) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the HSCB which can be found on their website at: [HSCB](#)

#### **4. Key roles and responsibilities**

##### **Bentley Wood High School's Safeguarding Team 2025-2026**

The following members of staff are part of the Safeguarding Team:

- Debbie Ferrer: Assistant Head teacher/Designated Safeguarding Lead
- Naseema Akbar: Head teacher
- Sarah Newman: Assistant Headteacher/SENCO
- Hary Ilanko: Assistant Headteacher/Online Safeguarding
- Ben Matchett: Head of Year /Counselling
- Jahnvi Manzi: Associate Assistant Headteacher/Sexual Harassment/PSHE/RSE
- Aliysha Myers: Parental Liaison/mentor
- Iain Rankin: Deputy SENCO
- Keely Kilkenny: Safeguarding Assistant and Inclusion Support

##### **Additional Key Colleagues/Organisations:**

- Bijal Ahmed: Bentley Wood's Attendance Officer
- Mellania Williamson-Taylor: Harrow Virtual School Headteacher
- Gavin Baker: Education Lead – MASH Team (Harrow)
- Matt Jukes: Bentley Wood High School's Safeguarding Governor
- Jubilee Academy/The Helix /Thrive at Whitefriars School (AP Provision)
- Francis O Sullivan (Bentley Wood's Senior Mental Health Lead)#

If any member of staff has a safeguarding concern, they are instructed to email the Safeguarding Team: [safeguardingteam@bentleywood.harrow.sch.uk](mailto:safeguardingteam@bentleywood.harrow.sch.uk) **without delay** (see systems laid out below).

**FOR ALL STAFF: Bentley Wood High School Safeguarding and Child Protection Flowchart**

**Designated Safeguarding Lead: Debbie Ferrer (extension 8603)**



If you have any concerns about the wellbeing of a student, email the Safeguarding team/DSL: [safeguardingteam@bentleywood.harrow.sch.uk](mailto:safeguardingteam@bentleywood.harrow.sch.uk)

Concerns about a child's welfare: email the safeguarding team: [safeguardingteam@bentleywood.harrow.sch.uk](mailto:safeguardingteam@bentleywood.harrow.sch.uk) or speak directly to Debbie Ferrer (DSL) or if Debbie is not available, contact a member of the Safeguarding Team. **When emailing, please just state the initials and the form group of the student you are referring and give as much factual information as you can.**

The DSL (Debbie Ferrer) will communicate to the referrer (either via email or in person) that they will be investigating further and will consider appropriate actions.

If the child makes an allegation about a member of staff

Go directly to the Headteacher: **Naseema Akbar**

- The DSL will:**
- Speak to the pupil
  - Take a statement
  - Speak to/inform the relevant HOY
  - Seek advice or refer onto to external agencies
  - Contact parents (if appropriate)
  - If SEND student, liaise with Sarah Newman (SENCO)
  - Offer counselling (liaise with Ben Matchett)
  - Online safety support (liaise with Hary Ilanko)
  - Sexual Harassment concerns (liaise with Jahnvi Manzi)
  - Concerns around Mental Health and Wellbeing (liaise with Francis O'Sullivan)
  - Medical Concerns (liaise with Shona Beltcher)

- Key People:**
- Headteacher:** Naseema Akbar Ext: 8757
  - DSL/Assistant Headteacher:** Debbie Ferrer: Ext: 8603
  - Medical:** Ext: 8769/8743
  - Mental Health Lead:** Francis O Sullivan Ext: 8604
  - Safer Schools officer:** Steven Rae [steven.rea@met.police.uk](mailto:steven.rea@met.police.uk)
  - Safeguarding Governor:** Alison Moore
  - Any concerns email:** [safeguardingteam@bentleywood.harrow.sch.uk](mailto:safeguardingteam@bentleywood.harrow.sch.uk)

All members of the **Safeguarding Team/DSL** and the **SENCO** have undertaken Safeguarding Training at level 3 or above and supports the DSL with the gathering information, ensuring record keeping is up to date, working with families and making referrals to external agencies.

In addition, our **Attendance Officer** works closely with external organisations in regard to liaising with families with regard to poor attendance at school or for children who are deemed to be missing in education.

Governors receive training on KCSIE 2025 and Prevent, with any necessary follow up amendments/updates, with a focus on online safety, AP oversights and attendance links with safeguarding.

All **Heads of Year** are also trained to at least level three and support the safeguarding team when gathering information, working with families and making referrals. All members of the **Senior Leadership Team** are also Level 3 trained, with the Head teacher, the DSL and the Deputies also trained in safer recruitment (Level Four).

## **Governing Body/Proprietor**

The governing body/proprietor has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The governing body/proprietor has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare. The governing body/proprietor will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The governing body/proprietor will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The governing body/proprietor will ensure that where there is a safeguarding concern school leaders will make sure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The governing body/proprietor will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The governing body/proprietor will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of children and young people as appropriate:

- child-on-child abuse
- online safety,
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- special educational needs and disability
- supporting pupils in school with medical conditions
- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to children who go missing from education, particularly on repeat occasions.
- safer recruitment

It is the responsibility of the governing body/proprietor to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the pupils who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff (including the headteacher, supply teachers, contractors, and volunteer helpers).

The governing body/proprietor will ensure that there is a named governor for safeguarding, a Designated Safeguarding Lead (Debbie Ferrer) who is a senior member of the leadership team and has lead responsibility for safeguarding and child protection, and a designated teacher (Debbie Ferrer) to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The governing body/proprietor will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).<sup>6</sup>

The governing body/proprietor will inform London Borough of Harrow Council and the HSCB annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

### **Designated Safeguarding Lead (DSL)**

The DSL (Debbie Ferrer) will take lead responsibility for safeguarding and child protection (including online safety including and understanding the filtering and monitoring systems in place). This will be made explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex C of KCSiE).

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

The DSL and any alternate DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

During term time, the DSL and/or an alternate should always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role and is expected to update their knowledge and skills at regular intervals to allow them to keep up with developments relevant to their role.

The DSL will liaise with the headteacher to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.<sup>7</sup>

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<sup>6</sup> Set out in paragraphs 83-93 of KCSiE

<sup>7</sup> See LA explanatory note on the requirements around children having an appropriate adult [Schools-StopSearch-v2.3.pdf \(squarespace.com\)](#)

## **Headteacher**

The headteacher (Naseema Akbar) will ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

## **All staff**

All staff have a responsibility to provide a safe environment in which children can learn.

All staff working directly with children must read and ensure they understand at least Part One of KCSiE. Those staff that do not work directly with children must read and ensure they understand either at least Part One/Annex A of KCSiE

All staff must ensure they are familiar with the systems within school which support safeguarding, including the child protection and safeguarding policy, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

All staff should be aware of indicators of abuse, neglect and exploitation and so that they are able to identify cases of children who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should know what to do if a child tells them he/she is being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity, such as knife crime, or involved in county lines drug dealing.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with the role they might be expected to play in such assessments.

All staff should be aware of, and understand their role within the [early help process](#) for all services, at both a Local Authority and school or college level. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early

identification and assessment, focussing on providing interventions to avoid escalation of worries and needs (see Section 12: Information Sharing). In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (SEN) (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or forced marriage.
- is a privately fostered child

Knowing what to look out for is vital to the early identification of abuse, neglect and exploitation and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Details of the school's safeguarding team are on the front this policy.

## **5. Induction & Training**

The governing body/proprietor will ensure that all staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with advice from the HSCB. In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-levels concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's

policies, procedures and Part One of KCSiE (or Annex A for those staff who do not work directly with children)<sup>8</sup> will be provided to new staff at induction.

The governing body/proprietor will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the governing body/proprietor will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all pupils.

## **6. Recognising concerns - signs and indicators of abuse.**

All staff should be aware of indicators of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

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

All staff should consider whether children might be at risk of abuse or exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

In all cases, if staff are unsure, they should always speak to the DSL (Debbie Ferrer) and the safeguarding team

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<sup>8</sup> Dependent on school stance on the condensed version of KCSiE. Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

## Indicators of abuse and neglect

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

The following indicators listed under the categories of abuse are not an exhaustive list:

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of the school's policy and procedures for dealing with it. (See section 7: Specific safeguarding issues) *[schools should cross-reference their school policy/procedures for dealing with child-on-child abuse within the school's Child Protection and Safeguarding Policy]*

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

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

(Source Keeping Children Safe in Education)

## 7. Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as of drug taking and/or alcohol abuse, unexplainable and or/persistent absences from education, serious violence (including that linked to county lines) and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they email the safeguarding team: [safeguardingteam@bentleywood.harrow.sch.uk](mailto:safeguardingteam@bentleywood.harrow.sch.uk)

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos<sup>9</sup> (also known as sexting or youth produced sexual imagery)

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<sup>9</sup> UKCIS guidance: Sharing nudes and semi-nudes advice for education settings.

\*<sup>1</sup> [Shore Space](#)

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

All staff should be clear about the school’s policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. *[cross reference or link to school policy] \*1*

## 8. Early help

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

The DSL will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. *Any Early Support referral to Harrow goes to: [Duty.Assess@harrow.gov.uk](mailto:Duty.Assess@harrow.gov.uk)*

*Early Support Hubs are made available to parents via the school website and communicated via email:*

Harrow Early Support Hubs	<a href="https://www.harrow.gov.uk/childrens-social-care/early-support-hubs">https://www.harrow.gov.uk/childrens-social-care/early-support-hubs</a> Tel: 0208 901 2690
Brent Early Help Service	<a href="https://www.brent.gov.uk/children-young-people-and-families/support-for-parents-and-families/early-help-service#whatistheearlyhelpservice">https://www.brent.gov.uk/children-young-people-and-families/support-for-parents-and-families/early-help-service#whatistheearlyhelpservice</a> Tel: 0208 937 3019
Families First (Hertfordshire)	<a href="https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx">https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx</a> Tel: 01438 737575
Barnet Early Help	<a href="https://www.barnet.gov.uk/children-and-families/early-help-children-young-people-and-families">https://www.barnet.gov.uk/children-and-families/early-help-children-young-people-and-families</a> Tel: 0208 359 2000

## 9. Concerns about Extremism:

Staff must Inform the DSL/a member of the Safeguarding team as soon as possible a Where there is a concern, t DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government’s programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children’s social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situation.

***In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:***

- ***Think someone is in immediate danger***
- ***Think someone may be planning to travel to join an extremist group***
- ***See or hear something that may be terrorist-related***

If in exceptional circumstances the DSL/safeguarding Team/SLG is not available, this should not delay appropriate action being taken. Staff must a referral to local authority children's social care directly, if appropriate (see 'Referral' section). Then inform the DSL as soon as possible,

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

### **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. \*<sub>2</sub>

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative 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 e.g. through others sharing videos or images of them on social media.

\*2 <https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation>

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 e.g. they believe they are in a genuine romantic relationship.\*3 **Female Genital Mutilation (FGM)** Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers<sup>10</sup>. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

## **Mental Health**

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

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

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's policy, contacting the mental health team:

[MH@bentleywood.harrow.sch.uk](mailto:MH@bentleywood.harrow.sch.uk)

We have an extensive team in school, including a Senior Mental Health Lead (Francis O Sullivan), GROW school counsellors, an EMHP (Education Mental Health Practitioner), WISH, Healing Hearts Team, a school Nurse (who visits the school) and two Welfare Assistant's. The Team works collaboratively to ensure the best provision for all students whilst ensuring the most effective liaison with home as well as external agencies for those students deemed to be most in need, and diagnosed with clinical mental health disorders. Safety plans are also in place for students who may pose a risk to themselves; these are developed collaboratively between school, home and external providers. More information regarding a national response may be found in [Mental Health and Behaviour in Schools Guidance](#).

## **Serious violence**

All staff should be aware of the indicators which may signal that children are at risk from, or involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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<sup>10</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

\*3 [helping-education-settings-identify-and-respond-to-concerns/](#)

## **11. Attendance: a Safeguarding Matter**

Regular attendance is essential to safeguarding and promoting the welfare of children. In line with statutory guidance *Working Together to Improve School Attendance*, where absence raises safeguarding concerns, schools **must** work with children's social care and other relevant agencies without delay.

Attendance monitoring is explicitly linked to safeguarding. When absence raises concerns, staff must escalate to Debbie Ferrer (DSL), Hary Ilanko (Assistant Head) and Bijal Ahmed (Attendance Officer) and, where appropriate, work with children's social care and the relevant local authority. Attendance data is reviewed regularly by SLG and the governing board for safeguarding patterns.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That's abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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). All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn.

## **12. Alternative Provisions**

The governing body/proprietor recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them.

### **Alternative Provision**

Where we place a pupil with an alternative provision provider (such as Jubilee Academy /The Helix), The School will:

- Obtain written confirmation from the provider that they have carried out the appropriate safeguarding safer recruitment checks on individuals working there that we would otherwise perform
- Keep an up-to-date record of AP addresses (including satellite sites).
- Conduct half-termly reviews of placements, including pupil welfare checks.
- Visit the student weekly and review the placement with key staff
- Any safeguarding concern at The AP will trigger an immediate review of the placement.
- Accurate records of pupil locations and attendance will be maintained.

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate

safeguarding checks have been carried out on new staff.

The management committee/proprietor will have regard to the following statutory guidance: [Alternative provision – DfE Statutory Guidance](#), and [Education for children with health needs who cannot attend school – DfE Statutory Guidance](#)

## **15. Children who need a social worker (Child in Need and Child Protection Plans)**

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

The governing body/proprietor expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and school to safeguard and promote the welfare of children.

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

## **14. Children absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a school
- › Come from new migrant families

It is important that the school's procedures for unauthorised absence and for dealing with children who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to LA

children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's unauthorised absence procedures and children missing education procedures [*cross-reference or include link to school procedures*]. This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

Further information and support includes:

- schools' duties regarding children who are absent from education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: [Children Missing Education](#).
- General information and advice for schools can be found in the Government's [Missing Children and Adults Strategy](#).
- further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#)
- Statutory guidance for schools concerning children who are absent from education
- <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

### **Elective Home Education -**

[https://assets.publishing.service.gov.uk/media/66bf6d2bdcb0757928e5bd47/Elective\\_home\\_education\\_departmental\\_guidance\\_for\\_local\\_authorities.pdf](https://assets.publishing.service.gov.uk/media/66bf6d2bdcb0757928e5bd47/Elective_home_education_departmental_guidance_for_local_authorities.pdf)

Many home education children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will work together with the LA and other key professionals to coordinate a meeting with parents/carers where possible.

Ideally this would be before a final decision has been made to, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child has an Education, Health and Care plan in place the LA will need to review the plan, working closely with parents and carers.

## **15. Children requiring mental health support**

**Francis O Sullivan is the school's senior mental health lead and is a member of the senior leadership team.**

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

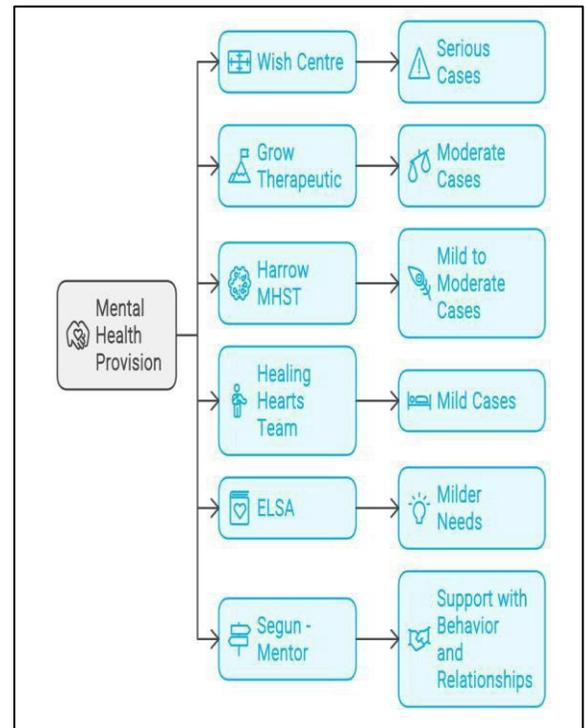
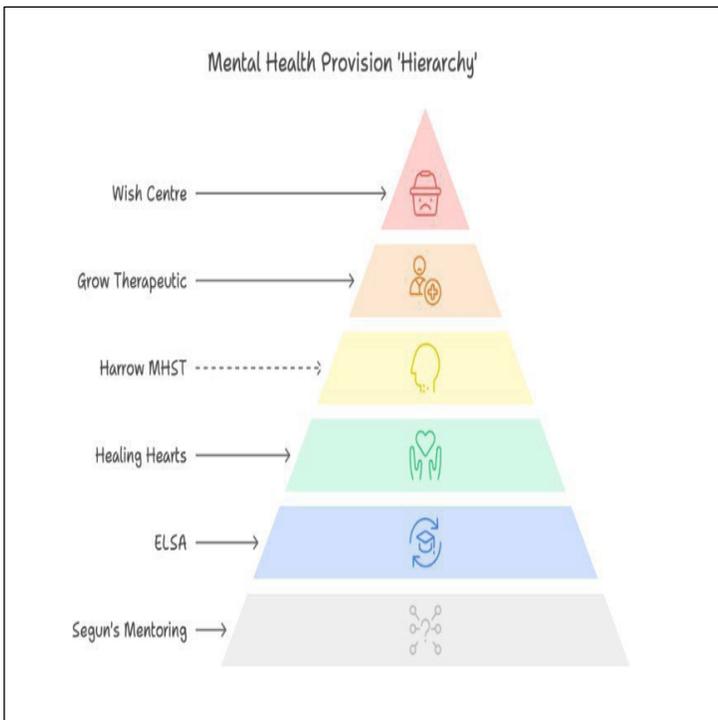
The governing body/proprietor will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system. *[school systems and processes for identification and routes to escalation should be included in the Procedures section of your CP policy].*

Staff can access further advice in a DfE guidance documents [Preventing and tackling bullying](#) and [mental health and behaviour in schools](#) which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of pupils.

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

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

Staff who have a mental health concern about a child that is also a safeguarding concern will act in line with this policy and speak to Francis O Sullivan, Ben Matchett, Debbie Ferrer or a member of the Safeguarding Team. The school will access a range of advice to help them identify children in need of additional mental health support, including working with external agencies. and has a comprehensive counselling support network, working with GROW, Harrow Horizons, The Wish Centre and CAMHs to support our students and their families. If you have a mental health concern, the school has a number of in school support pathways available



## **16. Looked after children and previously looked after children.**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The governing body/proprietor will ensure staff have the skills, knowledge and understanding to keep looked after children safe.

The governing body/proprietor will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The governing body/proprietor recognise that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

For children who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

## **17. Children with SEN and disabilities, or health issues**

Children with SEN and disabilities, or health issues can face additional safeguarding challenges, both online and offline.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Staff should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Staff also need to be mindful of children's cognitive understanding, for example, whether they are able to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in school.

As such, any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- And from specialist organisations such as:
  - The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service ([councilfordisabledchildren.org.uk](http://councilfordisabledchildren.org.uk))
  - Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
  - NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

### **18. Children who are lesbian, gay, bisexual, or gender questioning**

The governing body/proprietor acknowledge A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

### **19. Safeguarding in the Curriculum**

The governing body/proprietor will ensure that children and young people are taught about how to keep themselves and others safe, including online.

The governing body/proprietor recognise that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

Relevant topics will be included within Relationships Education (*primary schools*) and Relationships and Sex Education (also known as Sex and Relationship Education) (*secondary schools*) and through Health Education (*all pupils in state funded schools*), having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. \*4

The governing body/proprietor expect that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

## **20. Online safety and filtering and monitoring**

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm

Bentley Wood High School ensures that it is a safe place to learn and work online. Filtering and monitoring are both important parts of safeguarding students and staff from potentially harmful and inappropriate online materials. Students and staff are subject to monitoring and filtering to ensure that work devices are used safely and appropriately. This includes the use of Bentley Wood High School's IT devices at home as well as at school. Use of all IT devices used in school on the school network and at home are subject to monitoring and filtering – the school uses Smoothwall. Websites deemed as unsafe or inappropriate will be blocked by our filtering system.

Activity will be monitored and analysed, with designated individuals within the safeguarding team alerted to potential instances of concern. All level 5 concerns are flagged immediately to specified members of the Safeguarding Team, who will refer as relevant to the DSL and pastoral teams

The governing body/proprietor has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety, and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

The school recognises online risks now include misinformation, disinformation and conspiracy theories, in addition to harmful content, contact and conduct. Filtering and monitoring systems are reviewed regularly using the DfE's self-assessment tool "*Plan Technology for Your School*". Staff and pupils receive training on recognising and managing online misinformation, deepfakes and AI-generated content. The school follows DfE guidance on the safe use of generative AI (*Generative AI: Product Safety Expectations*).

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate pupils and staff in their use

of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

Online safety issues can be categorised into 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, or radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: being exposed 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;

\*4 [Relationships Education, Relationships and Sex Education and Health Education guidance](#)

- 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); and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

The governing body/proprietor will ensure that an annual review is undertaken of the school's approach to online safety including the school's filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks pupils face online. Schools can use the department's [plan technology for your school service](#) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

The review should include a member of the senior leadership team, the DSL, the IT service provider and a governor. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at [Cyber security training for school staff - NCSC.GOV.UK](#). In addition, schools and colleges should consider taking appropriate action to meet the Cyber security standards for schools and colleges which were developed to help them improve their resilience against cyber-attacks.

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>

School staff can access resources, information and support as set out in Annex B of KCSiE.

Mobile phones are not allowed in the inner circle of Bentley Wood High school. Students are expected to ensure that their phones are clearly put away during school hours. If a phone is seen or detected, it will be taken by a member of staff and put in the school safe – to be either collected by the student or parent,

\*5 [artificial-intelligence-in-education](#)

## 21. Procedures

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns on the school's safeguarding management system or on a school recording form for safeguarding concerns and pass it to the DSL without delay. [A suggested recording form is included at Appendix B]

### What to do if you are concerned.

If a child makes an allegation or disclosure of abuse against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth;
- Only ask questions when necessary to clarify, do not investigate or ask leading questions;
- Reassure the child, but don't make promises which it might not be possible to keep;
- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record, which should be signed and include the time, date and your position in school;
- Do not include your opinion without stating it is your opinion;
- Pass the information to the DSL or alternate without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a child in need. If the DSL is unsure whether the threshold has been met, they will contact the MASH Golden Number for advice (0208 901 2690). Where appropriate, the DSL will complete and submit the MASH referral form ([MASH-referral form](#))<sup>11</sup>.

Where the DSL believes that a child or young person may be at imminent and significant risk of harm they should call The Golden Number immediately and then complete the MASH Referral.

Where a safeguarding concern does not meet the threshold for completion of a MASH Referral, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help including the school or college's local early help offer.

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<sup>11</sup> N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police, although the DSL should also be made aware.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with HSCB procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each pupil.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education.

- If a student is absent from school it will be alerted to the pastoral team, who closely monitor attendance/patterns.
- Working closely with our attendance officer (Bijal Ahmed) a range of support and interventions will be explored such as: parental meetings, home visits, a referral to the Local Authorities Attendance Team, referral to Children Services, meeting with professionals such as CAMHS, Harrow Horizons

## **22. Substance Misuse**

We recognise the clear role our school has to play in preventing substance misuse as part of our pastoral responsibilities. We will provide age appropriate information on drugs and alcohol and tackle problem behaviour, working with local partners to prevent drug or alcohol misuse. For further guidance refer to DfE and ACPO Drug Advice for schools. (ACPO has changed to the National Police Chiefs' Council). Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) and County Lines CSE involves exploitative situations, contexts and relationships where a young person receives something, for example food, drugs or money, in return for performing and/or others performing on them, sexual acts.

CCE tends to involve similar contexts and relationships, but without any sexual acts. Both have become increasingly prevalent in recent years and the school will ensure that all students and staff are made aware of the risks of CSE and CCE and how to protect themselves/students from it. Attendance, in particular afternoon attendance will be carefully monitored to identify any patterns in absence which may indicate susceptibility to CSE or CCE. The issue of CSE and CCE will be addressed through, PSHE, and assemblies.

County Lines is a geographically widespread form of criminal activity involving drug networks or gangs that groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural or seaside areas. Missing episodes can be an important identifying factor, where the victim may have been trafficked for these purposes. In close working relationship with our local MASH, a referral to the National Referral Mechanism will be considered for any such concerns. Further advice can be obtained from Home Office guidance Criminal exploitation of children and vulnerable adults: county lines

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

Bentley Wood High School, we recognise that sexual violence and sexual harassment can occur between children of any age and sex, although we are aware of higher prevalence levels for students who identify as girls. We recognise that even if we are unaware of any cases, we would not dismiss the possibility of it

taking place and simply not being reported. It may occur online and offline and can be complex. Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

### **23. Management of sexual violence/ harassment cases**

Where appropriate, the management of such cases will be agreed in consultation with children's social care and/ or the police or other specialist service. There are four possible routes – **all** underpinned by the principle that such behaviour is **never acceptable and will not be tolerated**:

- **Manage internally** - In some case of sexual harassment, e.g. one-off incidents, it might be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support.
- **Early Help** – Providing early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
- **Referrals to children's social care** – Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to children's social care, who will determine whether any of the children involved are in need of protection or other services. Referring to children's social care should not delay our school from taking immediate action to protect the victim and other children. However, we will ensure that any such actions do not jeopardise a statutory investigation.
- **Reporting to the Police** – Any report to the police will generally be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the matter should be passed on to the police. If the alleged perpetrator is under ten (below the age of criminal responsibility), the principle of reporting to the police remains. The police will take a welfare approach, rather than a criminal justice approach.

*The school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents/ carers. They should also discuss the best way to protect the victim and their anonymity.*

With all routes outlined above, it is vital that all concerns, decisions and reasons for decisions are recorded (written or electronically on CPOMS).

**Bail conditions** –The term 'Released Under Investigation' (RUI) will apply where circumstances do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process. In all cases, our school will work with children's social care and the police to manage any implications and to safeguard children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

Throughout any criminal process taking place, the police will help and support the school as much as they can – within the constraints of any legal restrictions.

**The end of the criminal process** – if a child is convicted or cautioned for a sexual offence and remains in school/ college, expectations regarding their future behaviour and any restrictions must be made clear.

**Safeguarding and supporting the victim** – victims may not disclose the whole picture immediately. They should be asked if they would find it helpful to have a designated trusted adult to talk to about

their needs and have choice about who this is. In response to any stress they may experience, flexible or alternative arrangements for their education may need to be considered. We will do everything we reasonably can to protect the victim from bullying and harassment to ensure that they continue to receive a suitable education.

**Safeguarding and supporting the alleged perpetrator** – Any child will likely experience stress as a result of being subject of allegations and any associated negative reactions by their peers. We will respond proportionately, recognising that the alleged perpetrator may have unmet needs as well as potentially posing a risk of harm to other children. These behaviours may be a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice as appropriate from children’s social care, specialist sexual violence services and the police.

If the alleged perpetrator moves to another educational provision, our DSL will ensure that relevant staff at the new provision are made aware of any ongoing support needs and any potential risks to other children and the staff. Sanctions may also be put in place if and when appropriate:

*‘Taking disciplinary action and still providing appropriate support are not mutually exclusive. They can, and should, occur at the same time if necessary’ 5)*

The school has an effective programme of personal, social, health and economic education PCSHE and Sex and Relationships Education (SRE) to help our students to understand safeguarding issues, how to raise a concern they may have about themselves, or a friend or peer; and learn to recognise and develop healthy and respectful relationships, avoiding stereotypes and promoting equality.

Groups at particular risk include girls, students who identify as LGBT+, or are *perceived* by peers to be LGBT+, and pupils with SEND.

Students are aware of the NSPCC dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance.

## **24. Information sharing, record keeping and confidentiality**

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children’s welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child’s needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or

vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff will have regard to the Government guidance: [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and UK Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Well-kept records are essential to good child protection practice.

- “be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent program etc.”  
KCSIE 2025
- If in doubt about recording requirements, staff should discuss with the DSL.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or alternate DSL with other relevant members of staff. This will be on a ‘need to know’ basis and where it is in the child’s best interests to do so.

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils), or promise a child to keep a secret which might compromise the child’s safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the UK GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetuated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm tests is met.

Ordinarily, the school will always undertake to share its intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

The General Data Protection Regulation and the Data Protection Act 2018 states that, the school has the authority to share information with the Local Authority “in the exercise of our official duties without seeking consent”.

The “**public task basis**” as described in the legislation allows authorities to use data when they can demonstrate that the processing is to perform tasks that are set by national law. This means parental consent is not necessary for the obtaining and sharing of information

"Between agencies when that information is for child protection or safeguarding purposes or for an assessment of a child or children’s needs.

“**Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.” GDPR Article 6

The school will have regard to the HSCB Guidance on the Transfer of a Child Protection /or Safeguarding File to another Education Setting. Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer

or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

## **25. Managing allegations made against teachers, including supply teachers, other staff, volunteers and contractors**

The school will follow the HSCB [Managing allegations against staff and volunteers](#) if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /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; or
- behaved towards a child or children in a way that indicates he/she 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 applies to any child the member of staff, supply teacher, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

If any member of staff has concerns that a colleague, supply teacher, volunteer or contractor might pose a risk to children, it is their duty to report these to the headteacher. Where the concerns or allegations are about the headteacher, these should be referred to the Chair of Governors.

The headteacher/Chair of Governors should report the concern to the Local Authority Designated Officer (LADO) within one working day. The referral should be made via MASH using the MASH referral form.

## **26. Use of school premises for non-school activities**

The governing body/proprietor will ensure that where school facilities/premises are hired or rented out to organisations or individuals, sports associations or service providers to run community or extra-curricular activities appropriate arrangements are in place to keep children safe.

The governing body/proprietor will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the school facilities or premises to liaise with the school on these matters where appropriate.

These arrangements will apply regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Where a lease or hire agreement is entered into the governing body/proprietor will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement. The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

## **27. Whistleblowing**

The governing body/proprietor recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example, pupils in the school or members of the public.

The governing body/proprietor would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within school, including the whistleblowing procedure adopted by governors/proprietor where necessary [[whistleblowing-policy](#) ([harrow.gov.uk](http://harrow.gov.uk))] However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 28. Useful Contacts:

Harrow Children's Social Care & Multi-agency Safeguarding Hub (MASH)	<b>'Golden Number': 020 8901 2690</b> Emergency Duty Team: weekends, bank holidays and between 5pm-9am during the week: <b>020 8424 0999</b>
Police	<b>101 or for emergency: 999</b>
FGM - Mandatory reporting	<b>Police on 101</b>
Local Authority Designated Officer for Allegations against staff (LADO)	Initial referrals via MASH/Golden Number LADO: <a href="mailto:Lado@harrow.gov.uk">Lado@harrow.gov.uk</a>
Children and Young People with Disabilities 0-25 years	<b>020 8966 6481</b>
Local multi-agency procedures, guidance and Training: Harrow Strategic Safeguarding Partnership	<a href="http://www.harrowscb.co.uk/">www.harrowscb.co.uk/</a>
NSPCC	<b>0800 800 5000</b>
Report Abuse in Education NSPCC Helpline	<b>0800 136 663</b>
Childline	<b>0800 1111</b>
Government's Whistle-blowing Service via NSPCC Report Line	<b>0800 028 0285</b>
Forced Marriage Unit	<b>Tel: 020 7008 0151</b>  From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm)  Out of hours: 020 7008 1500 (ask for Global Response Centre)  Email: <a href="mailto:fmufco.gov.uk">fmufco.gov.uk</a>
Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)	<b>Tel: 020 7340 7264</b>  Email: <a href="mailto:counterextremism@education.gsi.gov.uk">counterextremism@education.gsi.gov.uk</a>
Disclosure and Barring Service	<b>Tel: 03000 200 190</b>  Email: <a href="mailto:customerservices@db.gov.uk">customerservices@db.gov.uk</a>
Teaching Regulation Authority	<b>Tel: 020 7593 5392</b>  Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>

## Harrow Attendance Team and Other Key Contacts:

<b>Name</b>	<b>Role</b>	<b>Contact details</b>
Raj Parmar	Head of Service	020 8416 8286 <a href="mailto:Raj.Parmar@harrow.gov.uk">Raj.Parmar@harrow.gov.uk</a>
Sherifa Clarke	Attendance & Alternative Provision Manager	07521000470 <a href="mailto:Sherifa.Clarke@harrow.gov.uk">Sherifa.Clarke@harrow.gov.uk</a>
Collette McDonagh	Court Attendance Officer	07762000505 <a href="mailto:Collette.Mcdonagh@harrow.gov.uk">Collette.Mcdonagh@harrow.gov.uk</a>
Pragna Bhatt	Lead Officer for Children Missing Education & Child Employment	07875197508 <a href="mailto:Pragna.bhatt@harrow.gov.uk">Pragna.bhatt@harrow.gov.uk</a>
Heather Richardson	Attendance Officer	07707153172 <a href="mailto:Heather.Richardson@harrow.gov.uk">Heather.Richardson@harrow.gov.uk</a>
Nalayini Gajan	Attendance Officer	07707153280 <a href="mailto:Nalayini.Gajan@harrow.gov.uk">Nalayini.Gajan@harrow.gov.uk</a>
Shereen Maitland	School Attendance Liaison and EHE Officer	07762000506 <a href="mailto:Shereen.Maitland@harrow.gov.uk">Shereen.Maitland@harrow.gov.uk</a>
Solomon Mwangi	Attendance Support Officer	07756295569 <a href="mailto:Solomon.Mwangi@harrow.gov.uk">Solomon.Mwangi@harrow.gov.uk</a>

29.

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

**Contents:**

- Appendix 1: types of abuse
- Appendix 2: safer recruitment and DBS checks
- Appendix 3: allegations of abuse made against staff
- Appendix 4: specific safeguarding issues
- Appendix 5: actions where there are concerns about a child
- Appendix 6: low level concerns
- Appendix 7: reporting incidences of alleged sexual violence and harassment
- Appendix 8: filtering and monitoring

## Appendix 1: types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

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

**Sexual abuse** involves forcing 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.

## **Appendix 2: safer recruitment and DBS checks – policy and procedures**

### **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
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to

work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we 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 consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

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

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

When seeking references we will:

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

### **Interview and selection**

When interviewing candidates, we will:

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

**Pre-appointment vetting checks**

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

### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

*\* Management positions are most likely to include, but are not limited to, headteachers, principals and Assistant Headteachers*

**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.

## **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.

## **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

## **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. The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside

the UK All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

## **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.

### **Pupils staying with host families**

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

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

## **Appendix 3: allegations of abuse made against staff**

Section 1: allegations that may meet the harm threshold

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

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

*If we're in any doubt as to whether a concern meets the harm threshold, we will consult 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 Bentley Wood High Trust.

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 local authority 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 local authority 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 local authority children's social care services, where necessary). Where the police and/or local authority 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 local authority 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 local authority 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 local authority 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 local authority 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 board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

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

Concerns may arise through, for example:

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

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

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

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

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

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

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

## **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to

confidentially share low-level concerns so that they can be addressed

appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

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

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

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

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

### **Record keeping**

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm 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

#### **Appendix 4: specific safeguarding issues**

All staff should be aware of indicators of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

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

All staff should consider whether children might be at risk of abuse of exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

In all cases, if staff are unsure, they should always contact the safeguarding team: [safeguardingteam@bentleywood.harrow.sch.uk](mailto:safeguardingteam@bentleywood.harrow.sch.uk) or speak to a member of the team/Debbie Ferrer (DSL)

#### **Assessing adult-involved nude and semi-nude sharing incidents**

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

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

### **Sexually motivated incidents**

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

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

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

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

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

### **Financially motivated incidents**

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

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

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

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

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering. Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person.

They may be contacted by a hacked account of a child or young person

- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### **Children who are absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an

immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

## **Child criminal exploitation**

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They

often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur

without the victim's immediate knowledge, for example through others copying videos or images. In addition to the CCE indicators above, indicators of CSE can include a child:

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

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

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

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail

about our school's approach to this type of abuse.

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

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

### **Homelessness**

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

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

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

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

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

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

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

## **FGM**

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

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

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

- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or

- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including Preventing Extremism and Radicalisation Policy, IT Policy, Equality Information and Objectives and Behaviour for Learning Policy.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour

to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- 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 (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- 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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Non-collection of children**

If a child is not collected at the end of the session/day, at least one or more of the following will be actioned:

- Parents/carers are contacted at home or at work
- If this is unsuccessful, the adults who are authorised by the parents to collect their child from the setting and whose telephone numbers are recorded on the data collection form are contacted
- All reasonable attempts are made to contact the parents or nominated carers
- The Headteacher, Head of Year or DSL (Designated Safeguarding Lead) are informed
- The child does not leave the premises with anyone other than those named on the data collection form
- If no-one collects the child **after one hour** and there is no-one who can be contacted to collect the child, we apply the procedures for uncollected children
- If the child has attended a trip, residential or other out of school activity, the same procedures are applied after **30 minutes**
- We contact our local authority children's social services care team/MASH and the child stays at the setting in the care of **two** members of staff until the child is safely collected either by the parents or by a social care worker
- Social Care will aim to find the parent or relative if they are unable to do so, the child will become looked after by the local authority
- If the child already has an allocated social worker, the school will contact them
- Under no circumstances do staff go to look for the parent, nor do they take the child home with them
- A full written report of the incident is recorded on CPOMS (our online reporting system for safeguarding)

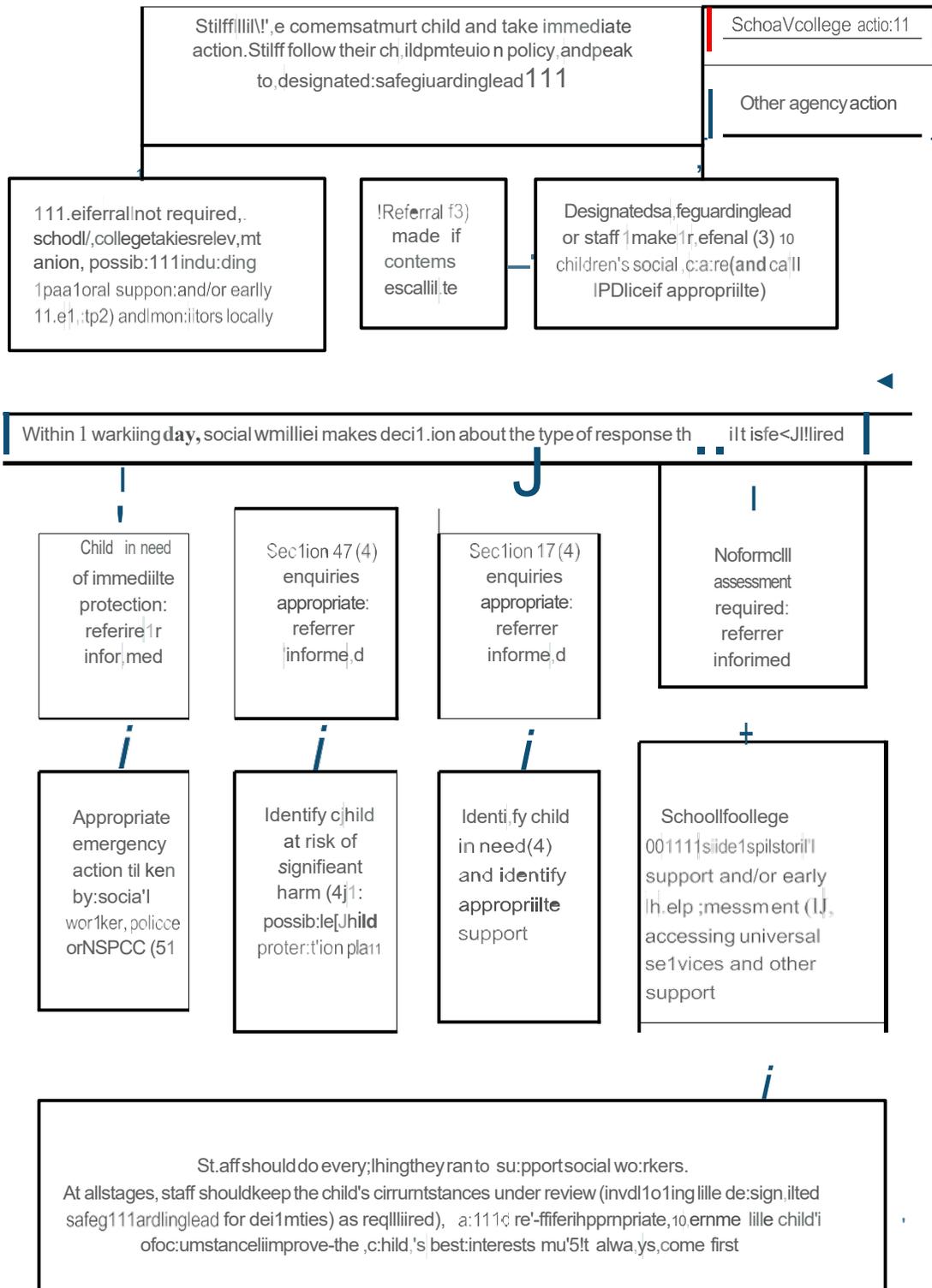
### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing whilst on school premises, we will:

- Senior staff will do a thorough check of the school site.
- Senior staff will contact parent/carer to inform them and request they contact their child via their mobile phone
- If the Child cannot be found either on school site, at the child's home or contactable via mobile phone, the school or parent will contact the police via 101/999.
- The school will also update the Harrow Safer School's Team and make them aware.

# Appendix 5:

# Actions where there are concerns about a child:



## **Appendix 6: Low-level concerns**

The School strives to embed a culture of openness and transparency in which the School's values and expected behaviour, as set out in the Code of Conduct for Staff, are constantly reinforced by all staff.

All staff should feel enabled to share any concerns about their own or another member of staff's behaviour, with the appropriate member of staff as set out below.

### The distinction between an allegation and a low-level concern

The term 'allegation' (in this context) means that it is alleged that an adult who works with children 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 he or she 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 that may have happened outside of School that might make an individual unsuitable to work with children)

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- is not consistent with the Code of Conduct for Staff, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such behaviour could include, but are not limited to, being over friendly with children, having favourites, taking photographs of children on their personal devices, 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 etc.

Staff are not expected to determine whether their concern is a low-level concern, serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination will be made by the Headteacher.

### How to share low-level concerns

It is important that low-level concerns are shared with the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern and relevant incident(s).

Concerns can be shared verbally in the first instance, or in writing. The context in which the low-level concern arose and details which are chronological, precise and accurate as possible of the concern and relevant incident(s) must be provided.

Where details of the low-level concern is provided verbally, the Headteacher will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. The Headteacher will check the accuracy of the record with the member of staff who raised the concern.

Low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

### Self-reporting

Staff who find themselves in a situation which could be misinterpreted, might appear compromising to others, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for Staff are encouraged to self-report. Self-reporting can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness

of the expected behavioural standards and self-awareness of the individual's own actions or how they could be perceived; and is an important means of maintaining a culture where all staff

aspire to the highest standards of conduct and behaviour. Recording and reviewing low-level concerns

All low-level concerns will be recorded in writing by the Headteacher. The record will include details of the context in which the concern arose and the action taken. The name of the member of staff sharing the concern will be noted however, where the member of staff wishes to remain anonymous this will be respected as far as possible.

Records will be reviewed at regular intervals to identify potential patterns of concerning, problematic or inappropriate behaviour.

### Retention of records

Records will be kept confidential, held securely and in compliance with the Data Protection Act 2018 and UK GDPR.

When the member of staff leaves and/or takes up new employment the records will be reviewed to ensure it still has value either as a safeguarding measure or because of its possible relevance to future claims and is therefore necessary to retain, or whether it can be securely destroyed.

### References

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor

performance. Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. Where a low-level concern has met the threshold for referral to the LADO and found to be substantiated will be included in a reference.

## Appendix 7: Reports of Incidences of Sexual Harassment

### Reporting incidents of alleged sexual violence and sexual harassment

#### Context:

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) **and are never acceptable.**

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools should be aware of, and respond appropriately to all reports and concerns, including those outside the school, and or online.

#### **We need to be clear that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated.**

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school are supported and protected as appropriate.

#### **What is sexual violence?**

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is sexual harassment?**

This list is not exhaustive but could include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools) taking and sharing nude photographs of U18s is a criminal offence;
- sharing of unwanted explicit content;
- upskirting (is a criminal offence);
- Sexualised online bullying;
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats.

### **Legal responsibilities and equality policies**

Schools and colleges are required to comply with relevant requirements as set out in the Equality Act 2010.

Schools also need to be aware of our obligations under the Human Rights Act 1998.

Compliance with the Public Sector Equality Duty (PSED) is a legal requirement.

Under the PSED, schools

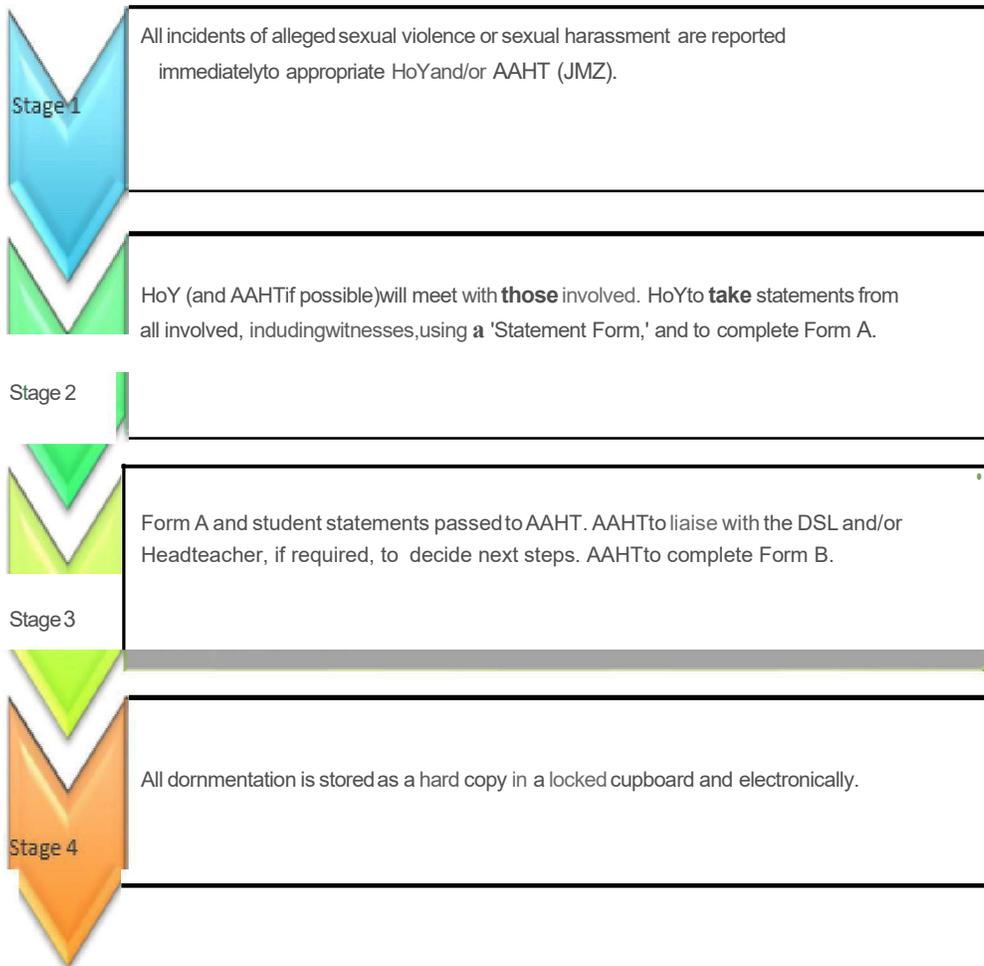
and colleges that are public bodies have a general duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between different groups and to foster good relations between different groups. The duty applies to all protected characteristics.

### **Action following a report of sexual violence and/or sexual harassment**

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment:

1. Manage internally
2. Early help
3. Referrals to children’s social care
4. Reporting to the police

Reporting process for sexual violence or sexual harassment



- Documentation to be deleted:
1. Student/ staff statements
  2. **form A**
  3. form B

**Incident of sexual harassment: Form A**

*To be completed by HoY following discussion with AAHT (JMZ)*

Incident reportedby		Role in school	
Incident reportedto		Role in school	
Date of incident		Date of report	
Nature of incident	Sexual violence	Sexual harassment	

**Section 1: Details of those involved in the incident** (continue on a separate sheet if necessary)

<b><u>Victim:</u></b>	<b><u>Alleged Perpetrator:</u></b>	<b><u>Alleged Perpetrator:</u></b>
If student at school please complete the following:	If student at school please complete the following:	If person outside school please provide details:
Yeargroup: Form group:	Yeargroup: Form group:	

**Section 2: Summary of the incident**

**Incident of sexual violence or sexual harassment: Form B**

*To be completed by AAHT following meetings with those involved*

**Section 1:**

Location of incident:

What type of incident occurred? Please highlight.

Sexual violence	Sexual harassment
Rape	Sexual comments
Assault by penetration	Sexual jokes or taunting
Sexual assault	Physical behaviour
Causing someone to engage in sexual activity without consent	Online sexual harassment

**Section 2:**

Action taken and support offered

*To be completed following consultation with the DSL and Head Teacher.*

What action(s) was / were taken to deal with the incident? Please highlight.

Warning to the perpetrator
Discussion with the victim's parent(s) / guardian / carer
Discussion with the perpetrator
Discussion with the perpetrator's parent(s) / guardian / carer
Sanction in accordance with the school's behaviour policy
Mediation
Mentoring or Counselling
Early help
Curriculum change or addition
Referral to children's social care
Reporting to the police
Exclusion (internal) and duration
Exclusion (external) and duration
Managed move
Permanent exclusion
Referral to another body
Other (please specify)

## Appendix 8: Filtering and monitoring

### Aim:

Bentley Wood High School ensures it is a safe place to learn and work online. Filtering and monitoring are both important parts of safeguarding students and staff from potentially harmful and inappropriate online materials. Students and staff are subject to monitoring and filtering to ensure that work devices are used safely and appropriately. This includes the use of Bentley Wood High School's IT devices at home as well as at school. Use of all IT devices used in school on the school network are subject to monitoring and filtering. This will also be active when individuals use Bentley Wood High School's IT devices at home. Ensuring safe and appropriate use at all times. Websites deemed not safe or appropriate will be blocked by our filtering system. This website list will be reviewed and updated regularly. Activity will be monitored and analysed with designated individuals within the safeguarding team alerted to potential instances of concern.

### Roles and responsibilities

#### Governing body

Key contact – Alison Moore

Bentley Wood High School's governing body has overall strategic responsibility for filtering and monitoring.

Our Governing Body will:

- Support the senior leadership team to procure and set up systems which meet required standards of filtering and monitoring.
- Conduct an annual review of the filtering and monitoring systems with the DSL and to ensure the school maintains records of this review for 5 years so that it can inform practice and be made available to those entitled to inspect that information.
- Work closely with the DSL so that incidents are urgently picked up, acted on and outcomes are recorded.

#### Designated safeguarding lead (DSL)

Key contacts – **Debbie Ferrer** (DSL & AHT) **Hary Ilanko** (AHT/Online Safeguarding Lead)

The DSL/Online Safeguarding Lead will:

- Ensure an effective system of filtering and monitoring is in place.

Overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns that emerge from said reports
- checks to filtering and monitoring systems

**The senior leadership team including Operations Manager** Key contacts – **Kieran Robinson** (DHT) and **Paola Boyadjian** (OM) The senior leadership team will:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why

- reviewing the effectiveness of your provision
- overseeing reports

The senior leadership team are also responsible for making sure that all staff

- are appropriately trained
- follow policies, processes and procedures
- act on reports and concerns

### **The IT service provider**

Provider: Advanced IT

(AIT) The IT service

provider will:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

The IT service provider should work with the senior leadership team and DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

### **Annual review of filtering and monitoring provision**

For filtering and monitoring to be effective it should meet the needs of your students and staff, and reflect your specific use of technology while minimising potential harm. To understand and evaluate the changing needs and potential risks, Bentley Wood High School will annually review our filtering and monitoring provision. This review will be carried out by the nominated member of the senior leadership team and DSL. The results of the online safety review will be recorded for reference, kept for 5 years and made available to those entitled to inspect that information.

### **Technical requirements of annual review**

The annual review will include:

- the risk profile of students, including their age range, students with special educational needs and disability (SEND), students with English as an additional language (EAL)
- what Bentley Wood High School's filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of students
- teaching requirements, for example, your RSE and PSHE curriculum
- the specific use of your chosen technologies such as 1:1 device
- what related safeguarding or technology policies Bentley Wood High School has in place
- what checks are currently taking place and how resulting actions are handled

To make your filtering and monitoring provision effective, Bentley Wood High School's review will inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked

- monitoring strategies

The review will be done as a minimum annually, or when:

- a significant safeguarding risk is identified
- there is a change in working practice, like 1:1 devices
- new technology is introduced

### **Other related fields and criteria included in the annual review**

The checks should include a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, students and guests

Bentley Wood High School will keep a log of checks so they can be reviewed.

These will include:

- when the checks took place
- who did the check
- what they tested or checked
- resulting actions

Bentley Wood High School will make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and students
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks

### **Useful resources to support annual review of filtering and monitoring**

South West Grid for Learning's (SWGfL) [testing tool](#) can be used to check that Bentley Wood High School's filtering system is blocking access to:

- illegal child sexual abuse material
- unlawful terrorist content
- adult content

