

# **The St Michael Steiner School**

## **Safeguarding: Child Protection Policy and Procedures**

### **Safeguarding**

Safeguarding is an umbrella term for measures and procedures designed to promote and prioritise the welfare of children and young people and protect them from harm. Our Health & Safety policies aim to minimise the risk of accidents; Safeguarding is more specifically related to harm that may be posed by other people with whom the children come into contact, either in real life or online.

A large part of safeguarding is the development of respectful, empathetic relationships between people, and while the dangers outlined in these policies are very real and must be taken seriously, we must also bear in mind that we should not engender fear in the children or make them suspicious or untrusting of other people; strong, trusting relationships are vital for their wellbeing and for the health of the school. We strive to create an environment where learning, truth, justice, respect, spirituality and community are promoted. This ethos is embedded in everything we do. The educational practices in our school are designed to support and promote the establishment of this environment. Small class sizes and the Class Teacher system mean that we become aware of changes in children's behaviour and wellbeing very quickly. Child Studies focus our attention collectively on any child about whom we have any concerns. Even so, children and young people are sometimes subject to abuse and neglect.

### **Child Protection**

The aim of our Child Protection policies is to raise awareness in staff of ways in which children may be suffering, how to recognise the signs, what to do if they have a concern and how to respond when someone discloses something. Everyone who comes into contact with the children in our school has a duty to protect them. This includes staff, trustees, parents and volunteers.

This policy is guided by the following principles as outlined in [Working Together to Safeguard Children \(2023\)](#) and [Guidance](#):

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

The school has a number of specific Safeguarding policies and procedures, including:

- Safeguarding/Child Protection policy (this policy)
- Child Study
- Code of Conduct & Behaviour Policy (pupils)
- Staff Code of Conduct
- Anti-bullying policy
- E-safety Curriculum Policy

- Equality & Diversity Policy
- EY Behaviour Management Policy
- EY Personal Care Policy & Procedure
- EY Sexual Behaviour Policy
- Use of Electronic Media Policy
- COVID-19: Remote Learning and Online Safety
- Pupils leaving the school Policy
- Relationships and Sex Education Policy
- Safer Staff Recruitment Policy & Procedure
- Whistle Blowing Policy and Guidance for Employees
- Out-of-hours babysitting policy
- Safeguarding Policy for Contractors working on site
- Human Values Statement

All of these policies are available on [our website](#).

## **Responsibilities of all staff**

Knowing what to look for is vital for the early identification of abuse and neglect. In order to facilitate this:

### **All staff must:**

- undertake the Child Protection training provided by Educare and refresh their training annually and as refresher courses become available and sign to confirm that they have done so. Contact Marta Pietrzyk for an access code.
- read the school's Safeguarding: Child Protection policy (this policy) in full before school starts every September and sign to confirm that they have done so.
- read Part 1 and Annex B of [Keeping Children Safe in Education \(2025\)](#) (at least) before term starts in September and sign to confirm that they have done so. Educare offer a helpful questionnaire on part 1 of KCSIE.
- read the school's Staff Code of Conduct and sign to confirm that they have done so.
- sign to confirm that they have not been disqualified or barred from working with children.
- attend training specific to the school's safeguarding procedures as provided by the Designated Safeguarding Leads and deputies at INSET days.
- ensure that the children for whom they are responsible know who they can go to if they are worried or anxious, or need someone to talk to.

**Mentors are responsible for inducting new members of staff and for ensuring that their mentees have done these things before term starts each September.**

Through their training and reading, all staff should then:

- be aware of indicators of abuse and neglect so that they are able to identify children who may be in need of help or protection

- be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. ([Contextual Safeguarding](#))
- be aware of the need for children to have guidance in how to keep themselves safe and be able to provide for it in their teaching in an age-appropriate way
- know what to do if they have concerns about a child's wellbeing
- undertake any additional training as required by the Designated Safeguarding Lead, for example if a particular aspect of safeguarding becomes an issue in the school
- undertake additional training through Educare that relates to the particular pupils they teach, and the context of this particular school, for example:
  - Safeguarding Young People
  - Child Protection in Education (Music)
  - Cyber Security
  - Understanding Self-harm
  - Adverse Childhood Experiences (ACES)
  - Contextual Safeguarding
  - Reflective Safeguarding for Schools
  - Understanding Anxiety
  - Understanding Low Mood and Depression
  - Raising Awareness of LGBT
  - Raising Awareness of Child-on-child Abuse
  - Harmful Sexual Behaviours
  - Mental Wellbeing in Children and Young People
  - Online Safety
  - Preventing Bullying
  - Substance Misuse Risks
  - Child-on-Child Sexual Violence and Harassment
  - The Prevent Duty
  - Safer Recruitment in Education
  - Young Carers
  - Female Genital Mutilation Awareness

**If you have any concerns about the welfare of a child, always speak to the Designated Safeguarding Lead or one of the deputies.** This should be your first resort<sup>1</sup>, especially if you are a new member of staff and don't know the children very well yet.

---

<sup>1</sup> Except in an emergency (i.e. when a child is in immediate danger) when you should contact the police yourself, or if you suspect a case of FGM, when you have a statutory duty to report it to the police.

## Responsibilities of Designated Safeguarding Lead, Deputies and Trustee

Certain College members have taken responsibility for Safeguarding in the school. We have a Designated Safeguarding Lead (DSL), a deputy (DDSL) and a Child Protection designated trustee with appropriate training. They are:

**DSL: Amanda Bell** [amandabell@stmichaelsteiner.com](mailto:amandabell@stmichaelsteiner.com) 07525 242883

**DDSL: Maria Da Costa** [mariacosta@stmichaelsteiner.com](mailto:mariacosta@stmichaelsteiner.com)

**Safeguarding Trustee: Coen Beugelink** [coenbeugelink@stmichaelsteiner.com](mailto:coenbeugelink@stmichaelsteiner.com)

**Please use phone numbers only for urgent communications outside school hours.**

[See Appendix 17](#) for a full description of their roles and responsibilities.

**Staff responsible for Safeguarding must undertake the Advanced Child Protection training** available through Educare, or another approved training for Designated Safeguarding Leads. **This must be renewed every two years and refreshed as new legislation comes into force.**

They should undertake regular **contextual Safeguarding** training in order to understand and connect the school's procedures with those of Hounslow Safeguarding and Child Protection services.

They should undertake additional training through Educare that will enhance their understanding of their safeguarding role **in the context of this school**, for example:

- Understanding the Role of the Safeguarding lead
- Managing Allegations of Abuse against Staff
- Reflective Safeguarding Practice for Schools
- Safeguarding Young People
- Supporting Staff Wellbeing in Schools

The specific issues that are likely to arise in this school are identified and discussed at in-service training provided by the staff members responsible for safeguarding in the school. Staff should then undertake additional Educare training as appropriate (see list above)

## Responsibilities of Trustees

The school is a registered charity. Charity Commission guidance on general charity and trustee duties to safeguard children is available [here](#).

One of the trustees (see above) is designated with responsibility for Safeguarding and is inducted according to the school's Trustee Induction Policy and Procedure. [See Appendix 17](#) for a full description of their role and responsibilities.

## This policy is supported by the following appendices:

1 - 14. **Significant Safeguarding issues:** all staff should be aware, from their Child Protection training, of these issues. Details about each one are in the Appendices for

reference - click on the title below - and in Annex B of [Keeping Children Safe in Education \(2025\)](#)

1. [Vulnerable children](#)
2. [Radicalisation and the Prevent Duty](#)
3. [Children Missing Education](#)
4. [Child Criminal Exploitation \(CCE\)](#)
5. [Child Sexual Exploitation \(CSE\)](#)
6. [County Lines](#)
7. [Children and the court system](#)
8. [Domestic abuse](#)
9. [Honour Based Abuse \(HBA\)](#)
10. [Serious Violence/ Gang Violence](#)
11. [Bullying](#)
12. [Female Genital Mutilation](#)
13. [Forced Marriage](#)
14. [Child on Child Abuse and sharing of indecent images](#)
15. [Mental Health](#)
16. [Essential contacts for information and advice if you suspect child abuse](#)
17. [Roles and responsibilities of designated persons](#)
18. [Working with parents](#)
19. [Working with diversity, including abuse of disabled children](#)
20. [Record keeping: disclosure form](#)
21. [Allegations of abuse against staff](#)
22. [Child Abuse – an overview](#)
23. [Flow chart: Actions where there are concerns about a child](#)
24. [Regulated Activities](#)
25. [Use of premises for non-school activities](#)
26. [Contractors working on site](#)
27. [Adultification of children](#)
28. [Filtering and Monitoring of internet use at school](#)
29. [Affluent Neglect](#)

**This policy has regard to the following laws, policies and guidance:**

- [Keeping Children Safe in Education \(2025\)](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Guidance on Working Together to Safeguard Children \(2023\)](#)
- [Early Years Foundation Stage statutory framework \(2023\)](#)
- [London Safeguarding Children Procedures \(2024\)](#)
- [Hounslow Council's Protocols, Guidance and Procedures](#)
- [What to do if you are worried a child is being abused \(March 2015\)](#)

- <https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>
- [Revised Prevent Duty Guidance \(December 2023\)](#)
- [Information Sharing: His Majesty's Government advice for safeguarding practitioners \(2018\)](#)

## How our school supports Safeguarding:

- By modelling, in our own behaviour, what it means to be a responsible adult. (*See: Staff Code of Conduct*);
- By setting expectations of behaviour for the children and young people in the school. (*See: Code of Conduct and Behaviour Policy (pupils); Anti-Bullying Policy*);
- By modelling, in the way we treat and behave towards each other, healthy, respectful human relationships.
- By working through the curriculum, in an age-appropriate way, to help children develop a realistic picture of the freedoms and responsibilities of adult life. (*See: Curriculum Policy; Lower & Middle School Curriculum Directory; High School Course Directory; PSHEE and Careers Policy; Relationships and Sex Education Policy*);
- By working through the curriculum, and within the school's overall ethos, to equip children, in an age-appropriate way, with the skills they need to stay safe from abuse. (*See: Relationships and Sex Education Policy; E-safety Curriculum Policy; Policy for the Use of Electronic Media; PSHEE and Careers Policy*);
- By ensuring that the adults around our children are trustworthy and responsible, by using safer recruiting policies and procedures in the appointment of all staff, trustees and volunteers (*See Safer Staff Recruitment Policy and Procedure*) and the engagement of contractors.
- By developing good relationships with parents and carers ([see appendix 18](#))

## How our school supports Child Protection:

- Through the long-term relationships we develop with the children in our care through the Class Teacher system, we are well placed to notice when something is wrong.
- Through Child Study: awareness of need mainly comes from teachers' own observations and from discussions with colleagues; in Child Studies at weekly College and departmental Pedagogical meetings, separate observations that, in themselves, may not seem too worrying can combine to bring a real issue to light. (*See Child Study Facilitation*)
- By continuing to develop awareness in all staff of the need for Child Protection, and everyone's responsibilities in identifying abuse and neglect, mental, emotional and physical, through:
  - Induction (*see the Staff Induction Procedure*);
  - In-house Safeguarding and Child Protection training (via Inset days);
  - Online Child Protection and other Safeguarding training via Educare;
  - Advanced training for Designated Safeguarding Lead and deputies;

- By identifying and monitoring children who may be ‘at risk’;
- By ensuring that children and young people in the school know who to contact if they need help, or if they know that someone else does.
- By ensuring staff understand the particular vulnerability of certain children, for example, those with SEN or disabilities; ([See Appendix 1](#))
- By ensuring all staff are aware of the Safeguarding procedures within the school.
- By ensuring outside agencies are involved where appropriate. (*See: Multi-Agency Working below*)
- By sharing information as needed, for example, with outside agencies and with the new school when a child leaves. (*See: Procedure for pupils leaving the school*). **NB The DSLs are responsible for ensuring that information about pupils is passed on.**

## Multi-agency working

Schools have a pivotal role to play in multi-agency safeguarding arrangements.

The school must contribute to multi-agency working in line with statutory [Guidance on Working Together to Safeguard Children \(2023\)](#)

The three safeguarding partners for our school are:

- Hounslow borough council;
- Hounslow clinical commissioning group;
- The chief officer of police Hounslow.

These three make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. Contact information is in [Appendix 16](#).

It is expected that the three safeguarding partners will name schools as ‘relevant agencies’. If named as a relevant agency, schools are under a statutory duty to co-operate with the published arrangements.

## School Procedures

### What to do if you suspect abuse or neglect

Any member of staff with an issue or concern relating to Safeguarding should immediately discuss it with Amanda, Maria or Julian.

Allegations of abuse must be given the highest priority and referred immediately.

1. Consider what you know, what you have seen or heard, and anything about the child that causes concern.
2. If a child discloses something to you, listen, take them seriously, reassure them that they did the right thing to tell you and that you want to help them.
3. Don’t probe or interrogate; ask questions only for clarification.
4. Write down what the child told you using their own words.

5. Never promise to keep something a secret. Let the child know you will tell (one of) Amanda, Maria or Julian, because they will know the best thing to do.
6. Report your concerns urgently to Amanda, Maria or Julian who will then:
  - i. discuss and review the concerns and advise on what actions to take next
  - ii. decide whether a referral to Hounslow Children's Specialist Services (or the child's home local authority if living outside Hounslow) is necessary.
7. Unless consultation with parents/carers is likely to place the child at risk of significant harm through delay or the parents' actions, you should arrange to see the child's parents/carers:
  - i. **Meet parents together with a Designated Safeguarding person.**
  - ii. Be open and honest, tell parents the reasons for your concerns and seek explanations.
  - iii. Be aware that the content may be highly emotive for you and for the parents.
  - iv. Explain your duty to report your concerns and try to get parental agreement for a referral to Hounslow Children's Specialist Services (or the local authority where the child lives, if not in Hounslow).
  - v. If the parents refuse to give permission for the referral, further advice should be sought from Hounslow and a referral made without consent if this is necessary to secure the child's safety.
8. Keep a written, dated record of all concerns, any discussions with the child and parents, discussions with ISI, social services and anyone else, and record and date any decisions made.
9. Always act in the best interests of the child
10. It is always better to work with the designated safeguarding team, but if the DSLs decide a referral is not necessary and you disagree, you can make the referral yourself. **Anyone can make a referral.** Information about when and how to make referrals is in [Appendix 23](#) and on page 57 of [Guidance on Working Together to Safeguard Children \(2023\)](#)
11. If you have any questions or concerns about Safeguarding or Child Protection, you can ask Amanda, Maria or Julian at any time.

## **12. IN AN EMERGENCY DIAL 999**

For the disclosure form to be filled in when a child or adult discloses something relating to Child Protection, [see Appendix 20](#)

## **Reporting concerns about children**

When one of the Designated Safeguarding team has received a report of a concern, they will decide on an appropriate course of action.

Advice in the first instance will be taken from Hounslow Safeguarding Children Partnership (HSCP). Contact information is in [Appendix 16](#). :

In any case, we will always act in the child's best interests. Although we will not always be able to act as the child wishes (e.g. keeping a disclosure secret), their wishes will always be taken into account in any decisions made.

## **If you feel the designated person has not acted on your concerns**

If you feel your concerns have not been acted upon, ask why; it may be for several reasons including:

- The designated person may have reasonably decided that the concerns are not yet significant and taken an alternative action.
- Information and/or actions may not have been communicated to you.
- Child Protection agencies (e.g. social workers, the police) may be in the process of investigating the concern and have yet to decide on actions to safeguard the child.
- There may be confidentiality reasons.
- There may be legal reasons.

If there are no reasonable reasons/circumstances why your concerns have not been acted upon, you should seek further advice from:

### **Hounslow Children's Social Care (CSC) contacts:**

- Head of Safeguarding: 020 8583 3061
- Child Protection Advisor: 020 8583 3064/5 or 020 8583 2785

### **Independent Schools Inspectorate:**

- email [concerns@isi.net](mailto:concerns@isi.net) or
- call 020 7600 0100

## **Listening to children**

Children communicate in many ways, not just verbally, but also through their behaviour, actions, reactions, drawings etc. We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult helps prevention. Research also shows that children often feel that safeguarding is 'done to' them, and want to be consulted about the best course of action in their particular case. The school will therefore:

- Provide a secure environment in which children can feel safe and able to speak about any concerns they may have.
- Ensure children know that, as well as their Class Teachers and Guardians, there are adults in the school whom they can approach if they are worried or in difficulty or need to talk.
- Taking into account their age and ability to understand their situation, ask them what they think would help them.

## **Working with parents**

We work closely with parents in our school to ensure that they are aware of our role and responsibilities in relation to Child Protection. The following arrangements are in place:

1. This policy is on our website
2. We have a Child Protection statement in our Parents Handbook. The handbook is updated annually and sent to all parents; this refers to our full policy which is on the school website
3. School notice board - designated persons are identified within the school as well as contact details for Hounslow Children's Services and ISI.
4. Our parents' complaints procedure is available on our website.

## **Safeguarding and cultural diversity**

Our school is a culturally diverse community. Parenting and child rearing styles can vary according to class, age, race, ethnicity, culture and/or religion. All parents have the right to raise their children according to their own beliefs, traditions or cultures and we need to be aware of passing judgement on or discriminating on the basis of difference.

However, all children have the right to protection and no parent has the right to abuse their children regardless of their background or circumstance.

We have regard to Hounslow Policy and Practice Guidance on Domestic Violence, Child Prostitution and Female Genital Mutilation and we will refer to the Hounslow Children's Specialist Services for guidance and action.

## **Information Sharing**

Information sharing is essential for effective Safeguarding and promoting the welfare of children and young people. It has been identified as a key factor in many serious case reviews (SCRs); poor information sharing has resulted in missed opportunities to take action that would have kept children and young people safe.

Our school takes advice from the government's [Information Sharing Guidance \(July 2018\)](#) which reflects the General Data Protection Regulation (GDPR) and Data Protection Act 2018.<sup>2</sup>

**The Data Protection Act 2018 and GDPR, including post-Brexit changes, do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must never be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

Further details on information sharing can be found here:

- [On Hounslow Council's website](#)
- On page 14 of [Guidance on Working Together to Safeguard Children](#)(2023)
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) The seven golden rules for sharing information will be especially useful

---

<sup>2</sup> [Guidance on data protection post-Brexit](#)

- at [The Information Commissioner's Office \(ICO\)](#) which includes ICO GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools](#) Guidance to support schools with data protection activity, including compliance with the GDPR.

## Confidentiality

It is essential that accurate records be kept where there are concerns about the welfare of a child. These records should be given to one of the designated safeguarding team. They are kept in secure, confidential files which are separate from the child's school records.

We are not required to disclose to parents any written information relating to Child Protection. We endeavour, however, to work in partnership with parents and for parents to be informed of and agree to any referral being made unless to do so would create an additional risk to the child.

In situations where there are no concerns around the child's safety but it is felt that sharing information would benefit the child and/or the parents, for example: to access additional help/support with learning; specialist health services; prevention services; parenting support and skill development; undertaking a common assessment (Early Help Hounslow or CAF); referring to Children's Services for children in need of extra support, we will recommend it but informed parental consent is required if necessary before information can be shared with these people and organisations.

It is very important that staff understand when they can and cannot share information; staff who breach confidentiality, or who fail to share information, could face action under staff disciplinary/code of conduct policies. Clear guidance about when to share information can be found on page 14 of [Guidance on Working Together to Safeguard Children](#).

## Recording and Record Keeping

Records include:

- a clear and comprehensive summary of the concern including:
  - Notes from discussions with child
  - Notes from discussions with parents
  - Notes from discussions with other Designated Safeguarding Lead persons
- details of how the concern was followed up and resolved including:
  - Decisions taken with time and date clearly signed
  - Information provided to Children's Specialist Services
  - Copies of any written referral confirming the verbal and telephone referral.
  - Any action taken and the outcome

### Good Recording practice

Written records may be needed by social workers, other professionals, the police or court at some future date. Parents may also have the right to access your written records. Be concise, objective and factual.

- What did you observe/hear? When and where?
- Exactly what caused your concern and why?

- What did the child say (in their words) or do (if anything)?
- What did the parents say, (in their words) or do (if anything)?
- How did you reply/respond?
- Describe events/actions/discussions as they happened.
- Avoid judgements and interpretations.

## Safer Recruitment and Selection

We practice safer recruitment, selection and monitoring and check that the teachers we employ are not prohibited from teaching.

Our selection and vetting procedures include checks into the eligibility and the suitability of all trustees, staff and volunteers who have direct or indirect contact with children through the Disclosure and Barring Service (DBS), with particular checks for those who have lived or worked outside the U.K. (*See our Safer Staff Recruitment policy.*)

## Allegations Against Staff (including supply staff and volunteers) or contractors

Staff in this context includes paid employees, volunteers, trainees and contractors.

Anyone who believes or suspects that a member of staff pose a risk of harm to children, or who hears such an allegation against a member of staff, including the accused person themselves, should bring this to the attention of the DSL or DDSL. **It is of the utmost importance that this is done immediately.**

If the allegation is about one of the Designated Safeguarding team, speak to another member of the safeguarding team. The person to whom the allegation is reported<sup>3</sup> will become the Case Manager.

The Case Manager will contact the LADO at Hounslow for advice and then follow the statutory guidance for dealing with allegations against professionals provided in Part 4 of [Keeping Children Safe in Education \(2025\)](#)

In an emergency, the Case Manager will call the police.

Detailed guidance is in [appendix 21](#)

## Information and Support for Education in Safeguarding

### General

[Keeping Children Safe in Education \(2025\)](#) provides a list of websites that can offer guidance and support to teachers in educating themselves, their children and parents about Safeguarding.

### Local

---

<sup>3</sup> In most schools, the Case Manager would be the Principal, but since the school's leadership team is the College, and the DSL and DDSLs are always members of College, it is appropriate that they become the Case Manager.

Hounslow's advice regarding [Domestic and sexual violence: identification and referral protocol](#)

Hounslow's free weekly [drop-in service for anyone suffering domestic abuse, sexual abuse or gender-based violence](#)

12 short films, building on our resources, to give professionals the confidence to identify and respond to concerns of child sexual abuse: <https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/>

Advice and support is also available 24/7 via the NSPCC's helpline on 0808 800 5000

September 2025

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke.

Approved by the Trustee with Responsibility for Safeguarding

## **Appendix 1**

### **Vulnerable children**

Staff should be aware that there are certain factors that may make some children more vulnerable to abuse than others:

#### **Being a looked after child or young person**

There are over 75,000 looked after children (children in public care) in the UK at any time. These include children in foster or residential homes or those still living with their parents, but subject to a 'Care Order'. They also include children who are temporarily looked after for respite on a planned basis.

The needs of a looked after child are often extremely complex. Developing a positive, loving relationship with a parent or caregiver (often called secure attachments) can sometimes be difficult which will affect how they react emotionally to situations.

Amanda Bell is the designated teacher for looked after and previously looked after children.

#### **Unaccompanied asylum seeking and refugee children**

They are alone, in an unfamiliar country and at the end of what could have been a long, perilous and traumatic journey. Some of these children may have experienced exploitation or persecution in their home country or on their journey. Some may have been trafficked and/or exploited in other ways.

These children and young people are more at risk than other children of: getting into trouble with the law; dropping out of school with poor educational attainment; sexually transmitted infection; unwanted pregnancy; homelessness; developing mental ill-health; other lifestyle behaviours such as smoking and alcohol and/or substance misuse.

#### **Disabled children**

Disabled children may be vulnerable to abuse because their impairment means recognising concerns may be more difficult. They may also be more dependent on their carers, receive intimate personal care, possibly from a range of different carers and have an impaired capacity to resist or avoid abuse. They may have fewer outside contacts and be especially vulnerable to bullying and intimidation.

#### **Very young children**

Younger children, especially babies are much more at risk of experiencing physical abuse and neglect.

Children with special educational needs (whether or not they have a statutory Education, Health and Care plan). These children are especially vulnerable to bullying and intimidation.

#### **Black, dual heritage or other minority ethnic children**

Professionals may have misconceptions or hold racist views about their culture or heritage. As in the case of Victoria Climbié, they may fear challenging parents or carers for

fear of being viewed as racist and therefore children may not receive the help and support they need.

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

Approximately 200,000 children in England and Wales have a parent sent to prison each year. 10,000 children visit public prisons every week. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

### **Homelessness**

According to the 'Vulnerable Young People: COVID-19 Response' report, more than 83,000 young people are estimated to be living in temporary accommodation or are sofa surfing. 380,000 more are either homeless or at risk of becoming homeless. This can be due to family conflict, homes being overcrowded or a change in a family's financial circumstances. These young people are at greater risk of experiencing mental health problems and exploitation.

For all the children mentioned above, public care can be a lifeline.

When considering the needs of these children, those taking care of them should be aware of their additional needs – for support with their education and all aspects of their physical, mental and emotional health and wellbeing.

## Appendix 2

### Radicalisation and the Prevent Duty

#### Introduction

Whilst there is no one definition of radicalisation, extremism is defined in the government's Prevent strategy as "vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs".

Radicalisation can lead young people become involved in acts of terrorism. The current UK definition of 'terrorism' is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Specified areas of work with children and young people; for example, health, social care, educational settings must have "due regard to the need to prevent people from being drawn into terrorism" and there is a mandatory reporting duty. This duty is known as the Prevent duty and to fulfil it, it is essential that organisations conduct a risk assessment.

The designated safeguarding lead and deputies should be aware of local procedures for making a Prevent referral and should undertake a risk assessment annually using the Prevent Duty Risk Assessment Form.

The school's Educare package includes online training about the Prevent Duty. The DSL has specific additional training in The Prevent Duty.

#### The Prevent Duty

The Prevent Duty is legislation designed to protect children from the risk of radicalisation. Children and students of all ages are potentially vulnerable; while young children are more susceptible to the direct influence of the people around them, older students who have access to the internet are at a greater risk of exposure to exploitative propaganda aimed at them. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

#### Identifying vulnerability

The designated safeguarding team is responsible for implementing the Prevent Duty in the school, but all staff should be able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Those classed as vulnerable may be targeted by extremists who tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family. Protecting children from the risk of radicalisation should be seen as part of your wider safeguarding duties.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Adolescents are particularly susceptible to radicalisation because their stage of development, anyway, means that they experience their individuality more strongly and this can lead to feelings of isolation and a wish to belong. They naturally question conventional views and look for others; their extreme feelings are mirrored in extreme views, so they find them attractive.

As children get older, they are increasingly likely to have unsupervised access to the internet. Here they can be exposed to hateful and discriminatory views in isolation and in secret, with no-one there to bring balance. The short-form nature of social media platforms and discussion forums means that users are encouraged to simplify and intensify the way they express their views, in order to make an impact. This in turn can lead to a culture of extreme, snapshot worldviews that are accepted and internalised by users.

Staff and parents should be aware that the 'dark web' is attractive to young people because it is subversive and exclusive. Here, radicalising content is unregulated. In order to access it, you have to install an anonymising browser like Tor, and this adds to the mystique. Information about Tor can be found [here](#).

Indicators of extremism/radicalisation include:

- spending an increasing amount of time on the internet (may be secretive or have more than one online identity)
- refusing to listen to different points of view
- becoming increasingly argumentative and abusive to others
- sympathetic to extremist ideologies and groups
- unwilling to engage with other young people who have different ideologies
- feeling persecuted
- changing friends
- changing appearance
- no longer doing things they used to enjoy

## **Protection**

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to children's family circumstances and changes in their behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act

proportionately which may include alerting the designated safeguarding lead who may make a Prevent referral.

But it is not simply a matter of preventing our students from coming into contact with extremist ideologies, even if that were possible; although these ideas will not be raised by teachers with very young children, we endeavour to make the school a safe space in which the children and young people can discuss, in an age-appropriate way, things they may hear on the news, or from adults.

Sensitive issues, including, terrorism and the extremist ideas that are part of terrorist ideology, are topics for discussion in Religion and, with older children, Global Issues lessons, where they can bring their thoughts and attitudes into the open among their peers, to be questioned and challenged at a level that is appropriate for their age.

The Prevent duty is not intended to limit discussion of these issues, but to underline schools' existing duties to forbid political indoctrination and secure a balanced presentation of political issues. As an Independent school, we set our own curriculum, but we must comply with the Independent School Standards, which include an explicit requirement to promote fundamental British values as part of broader requirements relating to the quality of education and to promoting the spiritual, moral, social and cultural development of pupils. Our Human Values Statement is clear about the values that underpin our curriculum and approach to teaching in the school.

The Early Years Foundation Stage (EYFS) places a clear duty on us to keep our children safe and promote their welfare. This means being alert to any safeguarding and child protection issues in the children's lives at home or elsewhere (paragraph 3.4 EYFS). Early years staff should be alert to harmful behaviour by other adults in the child's life and must take action to protect children from harm.

The close, long-term relationships we have with our children mean that staff are well placed to understand children's circumstances and to notice changes in behaviour which could indicate that they may be in need of help or protection in this regard.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

The designated safeguarding team will conduct an individual risk assessment if vulnerability to radicalisation is suspected, in order to determine whether to make a referral to Channel.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend to help with this assessment. An individual's engagement with the programme is entirely voluntary.

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

Statutory guidance on Channel is available [here](#)

## Partners

The Prevent Education Officer at Hounslow is [karmjit.rekhi@hounslow.gov.uk](mailto:karmjit.rekhi@hounslow.gov.uk) The Prevent Education Team has produced advice about policy and support with teaching and raising awareness of the Prevent Duty.

Hounslow's Prevent Toolkit for schools can be downloaded [here](#).

Further guidance is available on Hounslow's Prevent page [here](#).

## Resources and Guidance

[Revised Prevent Duty Guidance \(April 2021\)](#)

[Prevent Duty Guidance for those with Safeguarding responsibilities \(October 2022\)](#)

[Working Together to Safeguard Children \(2023\)](#) and [Guidance](#)

[Keeping Children Safe in Education \(2025\)](#)

[Information Sharing: Her Majesty's Government advice for safeguarding practitioners \(2018\)](#)

[Support for students who may be seen as vulnerable to being drawn into terrorism](#)

[Educate Against Hate website](#)

<https://parentzone.org.uk/home>

The school's Educare package includes online training about the Prevent Duty.

## Appendix 3

### Children Absent or Missing in Education

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

#### School procedures

Our [Attendance, Punctuality and Registration Policy](#), [Admissions Procedure](#) and [Procedure for Pupils Leaving the School](#) aim to ensure that frequent absences don't go unnoticed and that children are monitored when being admitted to and leaving the school. The [DfE's guidance on improving attendance](#) is now statutory and the school's policies have regard for it.

#### Attendance

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Schools and local authorities are expected to work together to put additional targeted support in place to remove any barriers to attendance. However, staff should sensitively consider some of the reasons for absence and understand the importance of school as a place of safety and support for children who might be facing difficulties, rather than reaching immediately for punitive approaches.

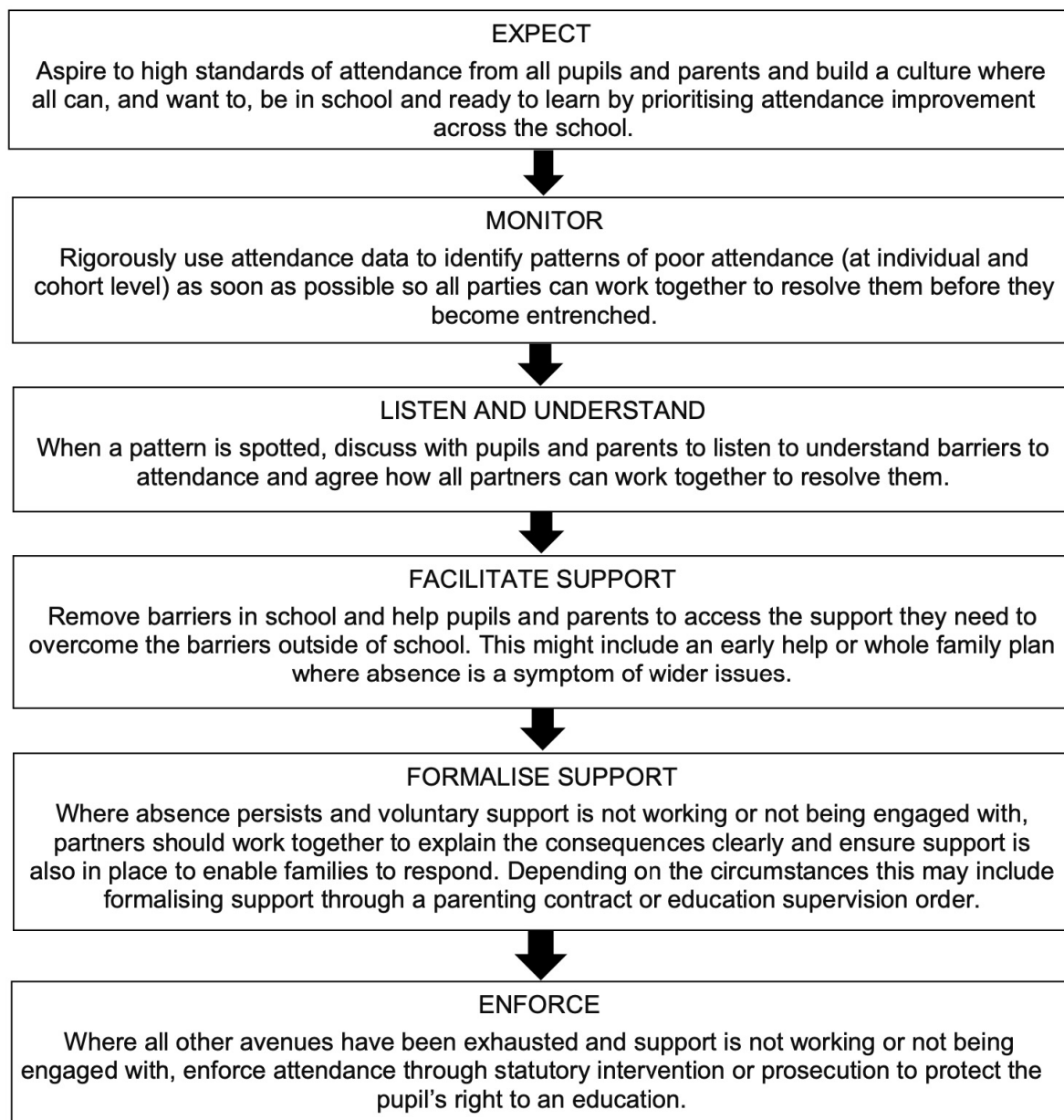
#### School procedures

Pupils' attendance is monitored through *Engage* and the admissions officer alerts the relevant teacher(s) when a pupil's attendance becomes a concern. This may be, for example, because no reason has been given for an absence or of a pattern is emerging, e.g. the child is regularly absent on Mondays.

Steps taken will usually begin with an email from the Class Teacher, Kindergarten Teacher or Class Guardian to the pupil's parents, informing them of the number of absences, or the pattern, expressing concern and inviting them to meet to discuss the matter.

Teachers should explain the particular importance of continuity in Waldorf education, as well as our legal duty, do their best to support parents to get their children to school regularly, and resolve the matter amicably.

The government provides [guidance for parents on school attendance](#), which may also be useful for teachers when speaking to parents. The flow chart below gives helpful guidance:



If attendance doesn't improve, and absence is 10% or more, (equivalent to 1 day or more a fortnight across a full school year), this will be considered persistent. In this case, or if there are concerns about the reasons given for absence, or any concerns about the child's welfare, the DSL should be informed.

As absence is so often a symptom of wider issues a family is facing, the Safeguarding team will work together with other local partners to understand the barriers to attendance and provide support. (Contact details in [appendix 16](#))

Where that is not successful, or is not engaged with, the law protects pupils' right to an education and provides a range of legal interventions to formalise attendance

improvement efforts, and where all other avenues have been exhausted, enforce it through prosecuting parents. Attendance legal intervention can only be used for pupils of compulsory school age and decisions should be made on an individual case by case basis.

### **Further information and support:**

- Guidance on school attendance '[Working together to improve school attendance](#)' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- General information and advice can be found in the Government's [Missing Children and Adults Strategy](#).
- [International Centre for Missing and Exploited Children](#)

## Appendix 4

### Child Criminal Exploitation (CCE)

**Child Criminal Exploitation (CCE)** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

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.

The victim may have been criminally exploited even if the activity appears consensual. 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.

CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

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 professionals 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.

**Resource:** [International Centre for Missing and Exploited Children](#)

## **Appendix 5**

### **Child Sexual Exploitation**

The government's definition of child sexual exploitation is:

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

Child sexual exploitation can include seemingly consensual relationships or sexual activity in exchange for attention, a place to stay, gifts, money, cigarettes or illegal substances. It can also include serious organised crime.

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

Children often trust their abuser; they may believe they are in a loving, caring relationship. Sexual exploitation is experienced by some children who are trafficked into a country.

Child sexual exploitation 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.

Child sexual exploitation 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.

Child sexual exploitation 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.

#### **Indicators of child sexual exploitation**

In addition to the general signs of sexual abuse, behavioural signs of child sexual exploitation include:

- being absent from school
- possessing unexplained gifts
- having an older boyfriend or girlfriend
- alcohol and drug misuse
- mood swings
- inappropriate sexualised behaviour.

[The DfE provides guidance](#)

Resource: [International Centre for Missing and Exploited Children](#)

## **Local**

[Hounslow's advice about CSE](#)

[Hounslow policy on CSE](#)

[Leaflet for young women and girls re CSE](#)

## **Appendix 6**

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed in appendices 4 and 5 may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

Further information on the signs of a child’s involvement in county lines is available [here](#)

School staff should follow the school’s procedures for unauthorised absence and for dealing with children who go missing from education, particularly repeatedly.

The school holds more than one emergency contact number for each pupil to help to identify any risk of abuse and neglect and help to prevent them going missing in future.

#### **Resources:**

<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

## **Appendix 7**

### **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children:

[5-11-year olds](#)

[12-17 year olds](#)

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

The Ministry of Justice offers an online child arrangements information tool [here](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## Appendix 8

### Domestic Abuse

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

**Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

**Coercive behaviour** is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

In December 2015, a coercive and controlling behaviour offence came into force. If found guilty a perpetrator can be imprisoned for a maximum of five years, fined or both.

Where physical violence is present there is an additional danger to children. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

#### Indicators of domestic abuse

All children living with abuse are under stress. That stress may lead to any of the following:

- being withdrawn
- being angry
- being anxious or depressed
- fear of being abandoned
- problems in school
- truancy and low attendance to school
- speech problems, difficulties with learning
- nightmares or poor sleep patterns
- bed-wetting
- drug or alcohol abuse
- self-harm, for example, eating disorders, cutting
- general poor health.

## Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually a designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass website](#).

## National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge: what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

## Local support

- [Hounslow's advice about violence and domestic abuse against women and girls](#)
- [Hounslow's advice regarding Domestic and sexual violence: identification and referral protocol](#)
- [Hounslow's free weekly drop-in service for anyone suffering domestic abuse, sexual abuse or gender-based violence](#)
- [Leaflet about domestic abuse](#)

## **Appendix 9**

### **Honour Based Abuse (HBA)**

So-called 'honour-based' violence/abuse (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators not only from the UK but also from abroad.

Honour-based violence can be physical, emotional and sexual abuse.

Victims can be of any age, gender or sexual orientation.

Crimes committed in the name of so-called honour may include:

- female genital mutilation (FGM)
- forced marriage
- breast ironing – the use of heated objects to flatten a girl's breasts and stop them from developing
- domestic abuse
- being held against their will.

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

#### **Resources section**

Karma Nirvana is a recognised charity that provides advice and support to those at risk of honour-based abuse. Website: [karmanirvana.org.uk](http://karmanirvana.org.uk).

Telephone: UK Helpline: 0800 5999 247 Monday - Friday: 9am - 5pm.

#### **Local support**

- Hounslow's free weekly [drop-in service for anyone suffering domestic abuse, sexual abuse or gender-based violence](#)

## **Appendix 10**

### **Serious Violence/Gang Violence**

Children and young people can become involved in many different forms of serious violence. They may feel peer pressure, a sense of belonging, that they are protected from harm, or fear retribution if they don't become involved. Not every child or young person is affected by serious violence, but for those who are, the impact on them, their families and communities is significant.

Those involved in this type of activity can be at risk of criminal or sexual exploitation; both are forms of abuse. Recognising changes in a young person's behaviour will help to identify a child that is being exploited and at risk of serious violence.

**Indicators which may signal children are at risk from, or are involved with serious violent crime may include:**

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

All young people are 'vulnerable' to forms of exploitation, but there are certain vulnerabilities and risk factors that can lead to a child or young person being particularly at risk. This includes children already experiencing trauma and abuse, those with connections to gangs or those in care. These children are 'desired targets' for perpetrators to exploit into criminal activity for their own benefit.

**Additional risk factors which increase the likelihood of involvement in serious violence are:**

- 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.

Extra information link: [NSPCC website](#)  
[Government guidance](#)

## **Appendix 11**

### **Bullying**

We recognise that bullying can impact on a child's functioning and self-esteem. Our [Bullying Policy](#) is available separately.

## **Appendix 12**

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

FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. It is also known as “female circumcision” or cutting.

The practice is medically unnecessary, extremely painful and has serious consequences, at the time the mutilation is carried out and in later life, both physically and mentally.

The procedure may be carried out when a girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy.

However, the majority of cases are thought to take place between the ages of five and eight, and therefore girls within that age bracket are at a higher risk.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

#### **Key points**

FGM has been illegal in the United Kingdom since 1985. The law was strengthened in the 2003 Female Genital Mutilation Act to prevent girls travelling from the UK to undergo FGM abroad.

FGM is practiced by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman and to be marriageable.

The practice is not required by any religion.

FGM is prevalent in 30 countries, mainly in Africa, as well as in parts of the Middle East and Asia. There were 3,870 newly recorded cases of FGM reported in England during April 2019 to March 2020.

#### **Indicators of FGM include**

Girls who are threatened with or have undergone FGM may:

- be withdrawn from education, restricting their educational and personal development
- feel unable to disobey their parents and, as a result, may suffer emotionally
- not turn up for health appointments
- have extended absence from school
- go to school but absent themselves from lessons, possibly spending prolonged periods in the toilets
- be anxious leading up to holidays
- talk of a ‘special ceremony’
- be generally anxious, depressed or emotionally withdrawn
- have a sudden decline in performance, aspiration or motivation.

## **Mandatory reporting**

The mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police. This responsibility cannot be transferred.

Whilst **all** staff should speak to a designated safeguarding lead or deputy with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work 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](#).

## **Appendix 13**

### **Forced Marriage**

A forced marriage is where one or both people do not or cannot consent to marriage and applies to non-binding, unofficial 'marriages' as well as legal marriages. It is recognised in the UK as a form of violence against both men and women.

It is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

Forced marriage is different from arranged marriage, where the families of both prospective spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement rests with both people involved.

#### **Indicators of forced marriage:**

- anxiety, depression, being emotionally withdrawn
- low self-esteem
- absence from school or permission sought for extended leave
- less commonly, cut or shaved hair as a punishment for disobeying, or a girl may say she has been to a doctor to see if she is a virgin
- showing fear about forthcoming school holidays.

#### **Extra information**

The Forced Marriage Unit operates a public helpline to provide advice and support to victims of forced marriage as well as to professionals dealing with cases. The assistance provided ranges from simple safety advice, through to aiding a victim to prevent their unwanted spouse moving to the UK ('reluctant sponsor' cases), and, in extreme circumstances, to rescues of victims held against their will overseas.

Telephone: +44 (0) 20 7008 0151

Out of hours: 020 7008 1500 (ask for the Global Response Centre)

Email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

If you are concerned that someone is in immediate danger you should call 999.

#### **Resource**

The government has published guidelines on [how to handle cases of forced marriage](#). Pages 75-80 focus on the role of schools and colleges

## **Appendix 14**

### **Child-on-Child Abuse**

Child-on-child abuse is experienced by an increasing number of children and young people and there are growing concerns raised by professionals. Child-on-child abuse can be physical, sexual, emotional and financial abuse. It can also be coercive control exercised between children and young people within their relationships.

#### **Children and young people can be at risk of:**

- harmful sexual behaviour
- serious youth violence
- domestic abuse
- child sexual exploitation.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers;
- 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);
- gender-based violence
- 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 nudes and semi nudes images and or videos<sup>13</sup> (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;
- coercive control
- initiation ceremonies, also known as hazing: 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).

#### **Possible indicators of Child-on-Child Abuse**

Child-on-child abuse can impact on children and young people in many ways. The child or young person may think that it is part of normal friendships or relationships.

## **A child or young person may:**

- miss school
- truant from lessons
- be withdrawn
- experience break down of family relationships
- be anxious
- be aggressive or argumentative
- self-harm
- become involved in alcohol or substance misuse.

## **Sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and harassment can occur face-to-face, online, physically or verbally. It should not be seen as 'banter', 'part of growing up' or 'just having a laugh'.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

## **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and have the freedom and capacity to make that choice.

Further information about consent can be found [here](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

The PSHE association provides [advice and lesson plans](#) to teach consent

The ISA also provides [training in PSHEE](#)

## **Power imbalance in sexual relationships**

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding leads or one of the deputies should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

## Non-consensual sharing of indecent images

Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal. Non-consensual sharing of indecent images is illegal *and* abusive, and is therefore a Child Protection issue.

[Detailed advice about sharing of nudes and semi-nude images and videos.](#)

[A website that features a video and song that schools can use to teach young children about the risk of being tricked into getting undressed online.](#)

## Responding to disclosures

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or be made to feel ashamed for making a report, or their experience minimised.

## Advice

Part five of [Keeping Children Safe in Education \(2025\)](#) goes into detail on how to manage reports of child sexual violence and harassment and contains further detailed information on:

- what constitutes sexual violence and sexual harassment
- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves
- related legal responsibilities for schools and colleges
- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s)

## Resources

- [Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities

- [Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- [Childnet - Step Up!, Speak Up!](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- [Preventing Harmful Sexual Behaviour toolkit](#) by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network](#) – Beyond Referrals - Schools leavers for addressing HSB in schools, from Durham University
- [A charity that provides support regarding abuse and technology](#)
- [A harmful-sexual-behaviour support service.](#)
- Local advice (Hounslow) for boys: [https://www.hounslow.gov.uk/download/downloads/id/668/child\\_sexual\\_exploitation\\_leaflet\\_for\\_young\\_males.pdf](https://www.hounslow.gov.uk/download/downloads/id/668/child_sexual_exploitation_leaflet_for_young_males.pdf)
- Local advice (Hounslow) for girls: [https://www.hounslow.gov.uk/download/downloads/id/667/child\\_sexual\\_exploitation\\_leaflet\\_for\\_young\\_females.pdf](https://www.hounslow.gov.uk/download/downloads/id/667/child_sexual_exploitation_leaflet_for_young_females.pdf)

## Appendix 15

### Mental Health

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

If you have concerns about a child's mental health, this should be raised first with your mentor. You should assess the risks and decide together what action needs to be taken. This could include: speaking with the child; their parents; other teachers; suggesting counselling or a CAMHS assessment; or just monitoring the child for a while and then reviewing. The department Faculty should be informed that there are concerns, in order that they can be supportive. However, discretion should be used: it may not be necessary to disclose details.

Mental health problems can sometimes be indicators of abuse, neglect or exploitation. If you have a concern about a child's mental health that may also be a Safeguarding concern, you should speak to a Designated Safeguarding Lead (DSL) or Deputy (DDSL) who will follow Safeguarding procedures.

Educare offers training in Mental Health issues in the course 'Mental Wellbeing in Children and Young People'. This is recommended for all staff, but especially for those who teach in the Middle and High School.

The DSL role includes the duties of the Mental Health Lead. The DSL and several other members of staff undertook a course in managing trauma between January and March 2023 as part of the school's PSHEE and safeguarding development.

### Resources

The following publications are helpful:

- [Mental Health and Behaviour in Schools](#) (DfE)
- [Promoting children and young people's emotional health and wellbeing](#) (UK Health Security Agency and the Office for Health Improvement and Disparities (OHID)):
- *Rise Above* (UK Health Security Agency and the Office for Health Improvement and Disparities (OHID)): <https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview> gives guidance and resources for addressing mental health issues in the classroom
- [Preventing and Tackling Bullying](#) (DfE)
- [Support for students who may be seen as vulnerable to being drawn into terrorism](#).
- [Every Interaction Matters](#) (UK Health Security Agency and the Office for Health Improvement and Disparities (OHID)/MindEd), a pre-recorded webinar that provides a simple framework for promoting wellbeing, resilience, and mental health
- [Wellbeing for Education Return](#) (UK Health Security Agency and the Office for Health Improvement and Disparities (OHID)/NHS/MindEd) published following the 2020 lockdown and covers issues such as bereavement, loss, anxiety, stress and trauma.

- [Local support](#)

## Concerns about children should be reported to the borough/local authority where the child lives.

This online tool will direct you to the appropriate person in a child's local borough: <https://www.gov.uk/report-child-abuse-to-local-council>

### RICHMOND

|                                                    |               |
|----------------------------------------------------|---------------|
| MASH Multi-Agency Safeguarding Hub 8am-6pm Mon-Fri | 020 8547 5008 |
|----------------------------------------------------|---------------|

|              |               |
|--------------|---------------|
| Out of hours | 020 8770 5000 |
|--------------|---------------|

### WANDSWORTH

|                                                    |               |
|----------------------------------------------------|---------------|
| MASH Multi-Agency Safeguarding Hub 8am-5pm Mon-Fri | 020 8871 7899 |
|----------------------------------------------------|---------------|

|              |               |
|--------------|---------------|
| Out of hours | 020 8871 6000 |
|--------------|---------------|

[Multi-Agency Referral form](#)

### HAMMERSMITH AND FULHAM

|                                                                                      |                                                                                             |
|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| Initial Consultation and Advice Team (ICAT) and Multi Agency Safeguarding Hub (MASH) | 020 8753 6600<br><a href="mailto:familyservices@lbhf.gov.uk">familyservices@lbhf.gov.uk</a> |
|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|

|              |               |
|--------------|---------------|
| Out of hours | 020 8748 8588 |
|--------------|---------------|

### SURREY

01483 517898  
[edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk).

### BERKSHIRE

[Report child abuse or a concern about a child](#)

The **Interagency Referral Form** can also be used to share information with your local office. More information on how to make a referral can be found [here](#).

### KINGSTON

You can: call us between 8:00am - 5:15pm, Monday - Thursday, and Friday between 8:00am - 5:00pm **0208 547 5008**. or call the out of hours duty team (evenings and weekends)

### EALING

If you are concerned that a child or young person is being harmed through abuse or neglect you should contact children and families on 020 8825 8000

### BARNET

<https://thebarnetscp.org.uk/bscp/children-young-people/welcome-to-the-children-and-young-people-pages>

### MERTON

|                                                    |               |
|----------------------------------------------------|---------------|
| MASH Multi-Agency Safeguarding Hub 9am-5pm Mon-Fri | 020 8545 3060 |
|----------------------------------------------------|---------------|

The CAHMS helpline is a service for children and young people under 18 and who live in Hammersmith and Fulham, Ealing or Hounslow and are in need help and support. The aim is to offer telephone support via a helpline number, which includes basic counselling and problem-solving to young people and their families. The helpline is run by healthcare professionals who are familiar with local services and have a range of specialist knowledge, to help support and advise young people and their families.

[Find out more about Speak CAHMS helpline](#) 0800 328 4444

[Hounslow Neglect Strategy toolkit](#) The DSL or DDSL can provide the school's own Quality of Care Assessment form to use in conjunction with this guidance.

## Suicide help

If you or anyone you know is struggling with thoughts of suicide or needs to debrief after a conversation around suicide, please contact HOPELINEUK for free and confidential support and guidance. Call 0800 068 4141 Text 07860 039961 Email [pat@papryrus-uk.org](mailto:pat@papryrus-uk.org)

Also see resources to support with conversations you may have with young people. Download the Communicating with young people [guide](#) and watch the Sinking Feeling [video](#)

## For children and young people

Childline offers free, confidential advice and support whatever your worry, whenever you need help.

[Childline](#) or **0800 1111**.

## For parents and professionals

|                                                   |                                                                                        |
|---------------------------------------------------|----------------------------------------------------------------------------------------|
| Police Contact for Child Abuse Investigation Team | 020 8246 0862                                                                          |
| Hounslow Clinical Commissioning group             | <a href="mailto:houcgcg.contacts@nhs.net">houccg.contacts@nhs.net</a><br>020 8538 2400 |

If you are worried about a child, even if you are unsure, you can call the NSPCC helpline on 0808 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Information on the Local Authority Designated Officer (LADO) for Hounslow



**London Borough  
of Hounslow**

### **Managing allegations against staff and volunteers who work with children.**

#### Introduction

Hounslow has two Local Authority Designated Officers (LADO) - Grace Murphy and Sarah Paltenghi.



Grace Murphy

Tel: 0208 583 4933

Email: [grace.murphy@hounslow.gov.uk](mailto:grace.murphy@hounslow.gov.uk)

Working days: Tuesday- Friday (9:00am-5:00pm)



Sarah Paltenghi

Tel: 0208 583 3423/ 07970198380

Email: [sarah.paltenghi@hounslow.gov.uk](mailto:sarah.paltenghi@hounslow.gov.uk)

Working days: Monday- Wednesday (9:00am-5:00pm).

#### **When to Contact us:**

A referral should always be made to the LADO if there is an allegation or concern that a person who works with children has:

- 1) Behaved in a way that has harmed a child, or may have harmed a child;
- 2) Possibly committed a criminal offence against or related to a child;
- 3) Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

If you are unsure whether your concern meets these criteria you can contact us for further advice and guidance.

#### **Our role as LADO includes:**

- 1) Providing advice and guidance to employers and voluntary organisations.
- 2) The management and oversight of allegations against staff and volunteers who work with children.
- 3) Liaising with the police and other agencies.
- 4) Monitoring the progress of cases to ensure they are dealt with as quickly as possible and that the processes followed are fair and consistent.

|                                                                                                                                                                                                                                                                                                                                               |               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Out of hours                                                                                                                                                                                                                                                                                                                                  | Answerphone   |
| KENSINGTON AND CHELSEA                                                                                                                                                                                                                                                                                                                        |               |
| <a href="mailto:socialservices@rbkc.gov.uk">socialservices@rbkc.gov.uk</a> or tel: 020 7361 3013.                                                                                                                                                                                                                                             |               |
| CROYDON                                                                                                                                                                                                                                                                                                                                       |               |
| Single Point of Contact (SPOC) Mon-Friday 9am-5pm                                                                                                                                                                                                                                                                                             | 0208 255 2888 |
| HILLINGDON                                                                                                                                                                                                                                                                                                                                    |               |
| <a href="mailto:safeguardingchildrenadmin@hillingdon.gov.uk">safeguardingchildrenadmin@hillingdon.gov.uk</a> or call 01895 250825                                                                                                                                                                                                             |               |
| HACKNEY                                                                                                                                                                                                                                                                                                                                       |               |
| Multi-Agency Safeguarding Hub (MASH) 9-5, Mon-Fri                                                                                                                                                                                                                                                                                             | 020 8356 5500 |
| Out of hours                                                                                                                                                                                                                                                                                                                                  | 020 8356 2710 |
| SLOUGH                                                                                                                                                                                                                                                                                                                                        |               |
| If the child or young person requires immediate protection please call <b>01753 875362</b> and send the electronic multi-agency referral form (MARF) to <a href="mailto:sloughchildren.referrals@sloughchildrenfirst.co.uk">sloughchildren.referrals@sloughchildrenfirst.co.uk</a> . The operating hours (for this team only) are 9am to 5pm. |               |
| RUNNYMEDE                                                                                                                                                                                                                                                                                                                                     |               |
| North-West Surrey Child Protection                                                                                                                                                                                                                                                                                                            | 0300 123 1630 |
| ELMBRIDGE                                                                                                                                                                                                                                                                                                                                     |               |
| North-East Surrey Child Protection                                                                                                                                                                                                                                                                                                            | 0300 123 1610 |
| ST ALBANS, WATFORD, THREE RIVERS                                                                                                                                                                                                                                                                                                              |               |
| Report a concern about a child                                                                                                                                                                                                                                                                                                                | 0300 123 4043 |

## Appendix 16

**Contacts for information, advice and reporting if you suspect child abuse:**

## **Appendix 17**

### **Roles and Responsibilities of Designated Persons**

The Designated Safeguarding Lead (DSL) is Amanda Bell. She has lead responsibility for all safeguarding matters and is available during term time either in person on site or by telephone or zoom link.

When/if she is indisposed (through illness or otherwise) the Deputy (DDSL), Maria da Costa has the same level of training and should take on the immediate responsibility for receiving and responding to any allegations or concerns in her absence.

The school is small, so responsibility for all aspects of Safeguarding and Child Protection remain with the DSL and the role of the DDSL is to support the DSL through:

- being available to the DSL for consultation, e.g. about a proposed course of action
- advising staff in their respective areas of the school
- being available to speak to any pupil, member of staff or parent on request.

The DSL and DDSL undertake Advanced Child Protection training every two years and when legislation changes in order that they are able to:

- Recognise how to identify signs of abuse.
- Recognise when it is appropriate to make a referral.
- Refer and follow up Child Protection referrals.
- Monitor Child Protection decisions within the school.
- Monitor Child Protection practice.

The DSL:

- Ensures there is always a designated member of staff for Safeguarding available at all times that the school is open.
- Ensure all staff and pupils know who the DSL and DDSL are.
- Ensure all staff have access to and have read our school's Safeguarding policy and procedure
- Implement the school's Child Protection procedures.
- Ensure pupils learn how to keep themselves safe, including online, through:
  - This policy
  - Anti-Bullying Policy
  - Policy for the Use of Electronic Media
  - E-safety education policy
- Organise Safeguarding induction and training every year for staff to raise awareness and confidence in implementing Child Protection procedures, including:
  - Ensuring all staff have access to and have read part 1 and Annex B of [Keeping Children Safe in Education \(2025\)](#)
  - Ensuring all staff are aware of and adhere to the Staff Code of Conduct (updated annually), including the Whistleblowing policy.

- Ensuring all staff are aware of and have access to the Education package of Educare on-line training to which the school subscribes
- Ensuring that Safeguarding is part of basic induction for all new staff on arrival (See Staff Induction Policy & Procedure).
- Ensuring all staff undergo Safeguarding training every two years and refresh knowledge and skills at least annually.
- Ensure all staff understand their duty to report known cases of female genital mutilation.
- Ensure all staff know what to do if they have concerns about the practice of other adults in respect to the safety and protection of children.
- When needed, invite external trainers for in-house training for all faculty members.
- Ensure the named trustee for Safeguarding undertakes training every two years and keep them informed/consult them about any Safeguarding issues that arise in the school.
- Regularly review policies and procedures at least annually and when there is new legislation.
- Provide support and advice for staff, pupils or parents who come to them with concerns
- Ensure appropriate recording systems are in place and monitor record keeping.
- Ensure that safeguarding information about pupils is passed on to the new school/ college when they leave the school.
- Liaise with external agencies and local Safeguarding partners.
- Attend meetings, Child Protection conferences, core groups etc.
- Assist the safeguarding trustee in conducting an annual review of safeguarding procedures and preparing a report for the trustees and College
- Help promote educational outcomes for vulnerable children by sharing with colleagues information about the welfare, safeguarding and child protection issues they experience;
- Support teaching staff to identify the challenges that vulnerable children might face and the additional academic support and adjustments that they could make to best support them.

## **Trustee with Responsibility for Safeguarding**

The trustee with responsibility for Safeguarding meets with the DSL termly and meets with the deputies annually. They must:

- Undergo training for school governors with responsibility for safeguarding every two years
- Read [Keeping Children Safe in Education \(2025\)](#)
- Ensure the DSLs have Advanced Safeguarding training every two years and their knowledge and skills are refreshed at least annually.

- Ensure that policies and procedures are reviewed and updated at least annually and when there is new legislation.
- Ensure that procedures have been followed in any Child Protection investigations
- Ensure appropriate recording systems are in place and monitor record keeping.
- Monitor Child Protection decisions within the school.
- Monitor Child Protection practice.
- Undertake an annual review of safeguarding procedures in the school and produce a report for the trustees
- Be copied into all emails about safeguarding issues in the school and follow up on them in the termly meetings with the DSL, or sooner if necessary.

All trustees receive the minutes from the weekly College meetings where the fact only of the occurrence of any Safeguarding issues is reported. The trustee with responsibility for Safeguarding will contact the DSL for details of any issues that are unfamiliar.

## **Sharing Safeguarding information with the new school or college.**

When children leave the school, the designated safeguarding leads should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding leads should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## **Advice for Designated Safeguarding Persons**

Holding responsibility for Safeguarding and Child Protection matters can be difficult and stressful so ensure you have the support of the College of Teachers and that they understand and support the nature and extent of your designated person role. The designated Trustee for Safeguarding can provide support and monitoring in this area.

Ensure you have access to your own support but do not let feelings or anxieties prevent you and/or your deputies from taking necessary action to protect children. The Designated Safeguarding Leads and deputies should seek advice from Hounslow council whenever necessary. Designated teachers have a duty of care towards staff making referrals about children's situations as well as to staff who have allegations made against them.

## **Appendix 18**

### **Working with Parents**

We see working with parents on a regular, on-going basis as one of the most important aspects of our work. We work at building strong relations with the parents of our children. Children may be with the same kindergarten teacher for three years, followed by eight years with their class teacher. During these years, an open, honest and frank relationship is striven for, through regular parents evenings, one-to-one talks both at school and during home visits, social events and informal conversations at the gate at pick-up time.

Explanations are sought by the teachers for injuries that happened outside school.

When the school decides not to seek parental permission before making a referral, the decision must be recorded in the child's file with reasons, dated and signed, and confirmed in the referral to Children's Specialist Services. The parents should be contacted to inform them that after considering their wishes, a referral has been made.

We must ensure that any concerns remain confidential and information and details are shared only with professionals directly concerned with the child.

## **Appendix 19**

### **Working with diversity**

- Working in a multi-racial and multi-cultural society requires professionals to be committed to in meeting the needs of all children and families and to understand the effects of racism as well as cultural and religious misunderstanding or misinterpretation.
- Staff and Trustees should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the [Public Sector Equality Duty 2023](#)), and the local multi-agency safeguarding arrangements.
- In order to make sensitive and informed professional judgements about a child's needs, and parents' capacity to respond to their child's needs, it is important that professionals are sensitive to the differing family patterns and lifestyles and to child rearing patterns that vary across different racial, ethnic and cultural groups.
- At the same time, children from all cultures are subject to abuse and neglect. All children have a right to grow up safe from harm. All children, whatever their religious or cultural background, must receive the same care and safeguards with regard to abuse and neglect.
- Anxiety about being accused of racist (or other similar term) practice should not prevent the necessary action being taken to safeguard and promote a child's welfare. Definitions as to what legally constitutes child abuse are indicated in this policy. Race, cultural and religious factors should not be regarded as acceptable explanations for child abuse or neglect, and are not acceptable grounds for inaction when a child is at risk of significant harm.

## Appendix 20

### Record of Concern or Disclosure

The sections will expand if you type into them

|                                                                               |
|-------------------------------------------------------------------------------|
| Child's Name                                                                  |
| Class teacher:                                                                |
| Date and time of concern:                                                     |
| Your account of the concern: (what was said, observed, reported, and by whom) |
| Additional information (your opinion, context of concern/disclosure)          |
| Your response : (what did you do/say following the concern)                   |
| Your name :                                                                   |
| Your signature :                                                              |
| Your position in school :                                                     |
| Date and time of this recording :                                             |

Actions and response of DMS for Safeguarding /Administrator

Name.....

Signature .....

date .....

**Please continue on other side if necessary.**

**At the end of each block of writing please initial and date.**

**If the concern or disclosure is being related to you by an adult or an older child, they may wish to read through what you have written and initial it also.**

## Appendix 21

### **Allegations of Abuse against Staff (including supply staff and volunteers) and Contractors**

We have regard to the statutory guidance from the [Keeping Children Safe in Education \(2025\)](#) Part 4. All allegations or suspicions against staff, whether permanent, temporary or volunteers, or contractors should be taken seriously and considered as requiring a Child Protection response/enquiry.

Allegations against staff are divided into two categories: Allegations that may meet the Harms Threshold and Low-level concerns. Both must be logged and addressed.

**Allegations that may meet the Harms Threshold** are those that allege that someone 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.

Allegations of this nature should be clearly marked in the log as possibly meeting the Harms Threshold.

**Low-level concerns** are any concerns or allegations that do not meet the Harms Threshold.

Low-level concerns should be clearly marked in the log as such.

#### **The following guidance applies to all allegations against staff:**

- The school's Safeguarding team will follow guidance in part 4 of [Keeping Children Safe in Education \(2025\)](#) in managing all allegations.
- All allegations against staff must be logged.
- All allegations of abuse against a member of staff must be reported to the [LADO](#). It is the DSLs responsibility to do this.
- Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
- If a member of staff is aware of an allegation against them, they should report it immediately to the DSL themselves.

- If the allegation is against one of our Designated Safeguarding Leads, another Safeguarding team member will inform the current Chair of College and will then inform the LADO
- If the allegation is against the Chair of College, a Designated Safeguarding Lead will inform the trustees and then the LADO, without informing the Chair of College.
- Children's Specialist Services will inform ISI of any Child Protection referrals in respect of any staff in their personal life.

An allegation may require consideration from any of the following four inter-related perspectives:

- Child Protection
- Criminal investigation
- Complaint procedures
- Staff disciplinary procedures

Information about an allegation must be restricted to those who have a need to know in order to:

- Protect children.
- Manage disciplinary/complaints aspects
- Facilitate enquiries
- Protect any rights of the alleged perpetrator

We have a dual responsibility – to safeguard the children in our care and to ensure staff are treated fairly. The school will:

- handle any report or allegation on a case-by-case basis.
- apply common sense
- deal with allegations quickly, fairly and consistently
- provide effective protection for the child(ren) and support the person against whom the allegation has been made

Where a report is going to be made to children's social care and/or the police, advice will be sought from the relevant agency about next steps and how the alleged perpetrator(s) will be informed of the allegations.

The school will, however, take immediate action to safeguard the children, where required.

If a staff member is faced with an allegation against them, they may benefit from the independent advice of a solicitor.

Suspension from duties is a neutral act and it should not be automatic. It should be considered if the allegations meet the harms threshold as defined above.

Once the referral is made to the LADO, they will consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the Designated Safeguarding Leads to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations and the individual's current contact with children. The Designated Safeguarding Leads may need to involve the police.

NSPCC [Guidance about when to call the police](#)

The available information will be considered and it will be decided whether an investigation is indicated, who will be involved and arrangements for interviewing:

- The child
- Any witnesses
- Parent/guardian/carer
- The accused staff member
- The person who made the allegation

The final decision regarding the person's continued employment will be informed by the outcome of the Child Protection investigation and/ or criminal investigation.

It is not advisable to accept a person's resignation as an alternative to dismissal.

Even if the police decide there is not enough evidence to bring criminal charges, the school will decide whether to proceed with a disciplinary hearing on the basis of prima facie evidence under our disciplinary code.

For further advice and support on how to manage an allegation against a staff member, please contact: the [Local Authority Designated Officer \(LADO\)](#)

## **Referrals to the TRA**

Independent schools have a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are:

- unacceptable professional conduct
- conduct that may bring the profession into disrepute
- a conviction, at any time, for a relevant offence

The Designated Safeguarding team and the Trustee with responsibility for Safeguarding together will refer to the document [Teacher misconduct: the prohibition of teachers \(February 2022\)](#) and seek further guidance from the TRA website and make a decision about whether an allegation against a teacher is sufficiently serious to refer to the TRA. If they think it is, the Chair of College and Chair of Trustees will be informed of the action they intend to take.

They should also consult the government's [DBS referral guidance](#) to determine whether a referral should be made to the DBS

## **Low level concerns**

Concerns which do not meet the Harms Threshold, e.g. anything else that contravenes the Staff Code of Conduct, should still be reported to a DSL/DDSL, who will record them in the Complaints and Concerns log (Staff) and handle them according to the Staff Discipline and Grievance Policy and Procedure.

## **Unsubstantiated and False Allegations**

- False allegations made by children are rare and may be an indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the school will, in consultation with Hounslow Child Protection Advisor and ISI, refer the matter to Children's Specialist Services to determine whether the child is in need of services, or might have been abused by someone else.
- Where it is concluded that there is insufficient evidence to substantiate an allegation, the Designated Safeguarding Leads will consider what further action to take, if any.
- ISI may also take further actions, as above.
- If it is established that an allegation has been deliberately invented, the police will be asked to consider what action may be appropriate. We will also consider taking action according to our Codes of Conduct.
- Records of allegations that turn out to be false will be kept in the usual way.
- The Information Commissioner has published guidance on employment records in its, [The Information Commissioner Employment Practices Code](#) which provides practical advice on record retention.

## **Appendix 22**

### **Child Abuse: An Overview**

#### **What is child abuse and neglect?**

Child abuse and neglect are forms of maltreatment of children including serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the child's health or development. Children can be abused through the infliction of harm, or through failure to act to prevent harm. 'All staff should be aware that abuse, neglect and Safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues overlap with one another.

#### **Some of the following signs might be indicators of abuse or neglect:**

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;

- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Abuse and neglect can affect children of any age, class or family background. Children may be abused within their family, in a setting, in an institution or in the community. Children are abused by people known to them, or more rarely, by a stranger. Children can be abused by an adult or adults or another child or children. Children may show signs of being abused in different ways – physically, emotionally, behaviourally, or they may tell you directly.

All staff should be familiar with the definitions and possible indicators of abuse. Whilst some indicators may not ultimately constitute child abuse, all staff have a responsibility to report and discuss any concerns they have about a child with a Designated Safeguarding Lead or Deputy.

There are four main categories of abuse and neglect: physical abuse, emotional abuse, sexual abuse and neglect. Each has its own specific warning indicators, which you should be alert to. **“What to do when you’re worried a child is being abused”** (March 2015) sets out the following descriptions.

## **Abuse**

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

## **Physical abuse**

Physical abuse is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens.

Babies and disabled children also have a higher risk of suffering physical abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse can also occur outside of the family environment.

**Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained:
  - bruises or cuts;
  - burns or scalds;
  - bite marks.

## **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child.

Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

## **Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

## **Sexual abuse and exploitation**

Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at

sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

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

### **Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

- The CSA Centre gives [advice about how to handle child sexual abuse](#).

### **Some of the following signs may be indicators of sexual exploitation:**

- unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- sexually transmitted infections or becoming pregnant;
- changes in emotional well-being;
- use of drugs and alcohol;
- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part in education.

The Children's Society gives advice about [how we can help to prevent CSE](#)

## Child sexual abuse material (CSAM)

CSAM images can be found on the internet platforms we use every day. These images are commonplace and can be found on mainstream social media and online gaming platforms.

In 2021 there were 85 million pictures and videos depicting child sexual abuse reported worldwide, many more will have gone unreported. Due to the COVID 19 pandemic, children are spending more time in the digital world than ever before.

A recent report from the Internet Watch Foundation (IWF) found a 64% increase in reported webpages containing confirmed child sexual abuse images in 2021 compared to 2020. Almost seven in 10 instances involved children aged 11 - 13 years. The same report showed that 97% of the images removed were of girls.

### Resources:

[So You Got Naked Online](#) - Advice and strategies to support the issues resulting from sexting.

[Internet Watch Foundation](#) - exists to find and remove CSAM from the internet.

## Sexual Harassment between children

Sexual harassment refers to unwanted conduct of a sexual nature that can occur online or offline. It violates a child's dignity, makes them feel intimidated, degraded, humiliated and/or creates a hostile sexualised environment. Examples include:

- Sexual stories, lewd comments about clothing and sexualising names
- Sexualised online bullying
- Sexting (sexually explicit texts)
- Sexual images on social media
- Sexual exploitation: coercion and threats.
- Upskirting, (taking a picture under a person's clothing without them knowing, in order to obtain sexual gratification or cause the victim humiliation, distress or alarm). This is now a criminal offence.
- Sexual jokes or taunting
- Unwanted sexual physical contact such as deliberately brushing up against another child
- Displaying sexual pictures
- Non-consensual sharing of sexual images and videos online

**Resource:** [Step Up, Speak Up](#) - resources and guidance for professionals to raise awareness of sexual harassment amongst young people.

## Neglect

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action.

However, while you may be concerned about a child, neglect is not always straightforward to identify. See [Appendix 29](#) for information about Affluent Neglect

Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

### **Some of the following signs may be indicators of neglect:**

- Living in a home that is indisputably dirty or unsafe
- Being frequently hungry or dirty
- Not having adequate clothing, e.g. no winter coat
- Living in dangerous conditions, e.g. around drugs, alcohol or violence
- Being frequently angry, aggressive
- Self-harming
- Not receiving basic health care
- Parents who fail to seek medical treatment when their children are ill or are injured.

### **Abuse of Disabled Children**

UK evidence suggests that disabled children and children with special educational needs are at increased risk of abuse and that the presence of multi-disabilities appears to increase the risk of both abuse and neglect. Disabled children and children with special educational needs may be especially vulnerable to abuse for a number of reasons:

- They may receive intimate personal care, possibly from a number of carers that may both increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries.
- They may have an impaired capacity to resist or avoid abuse.
- They may have communication difficulties that may make it difficult to tell others what is happening.
- They are more vulnerable to peer-on peer abuse, peer group isolation and can be disproportionately impacted by behaviours such as bullying.

## **Appendix 23 Referral flowchart**

## Actions where there are concerns about a child



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

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

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

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

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

## Appendix 24

### Regulated Activity

#### Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.

HM Government has produced [Factual note on regulated activity in relation to children: scope](#).

Regulated activity includes:

- a. teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b. work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.<sup>66</sup> Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c. relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;<sup>67</sup>
  - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve teaching, training; and
- supervised activity which is paid in non-specified settings such as youth clubs, sports clubs etc.

## **Appendix 25**

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

When non-school services or activities are provided under the direct supervision or management of school staff, the usual arrangements for child protection will apply.

However, where services or activities are provided separately, for example by parents, or hired out to other bodies for community or private events, this is not necessarily the case. The school should therefore seek assurance from the hirer that appropriate arrangements are in place to keep children safe (including inspecting these as needed) and to liaise with the school on these matters where appropriate.

Safeguarding requirements should be included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

This applies regardless of whether or not the children who attend any of these services or activities are children who attend the school.

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.

If the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), unless a child is in immediate danger (in which case the police should be called) it should be passed to the DSL, who will follow the usual safeguarding policies and procedures, including informing the LADO.

## **Appendix 26**

### **Safeguarding Policy for Contractors working on site**

The school engages the services of professionals and workers who are not its employees and therefore have not undergone the school's usual safeguarding checks (See Safer Recruitment Policy), for example, cleaners and people who maintain the premises, service equipment, make deliveries and collections.

As far as possible, arrangements should be made for this work to be done outside school hours when there are no children on site.

The school receptionist (or a member of staff acting in that role) will always check the identity of any contractors or workers on arrival at the school on their first visit. A record of checks done will be filed in reception for reference on subsequent visits.

In cases where the contractor does not have opportunity for contact with children, proof of identity on the first visit would be appropriate.

When it is necessary for these people to be on site during the school day, where they may come into contact with children, certain safety checks need to be made or they must be supervised while they are on the premises.

#### Contractors

For those who are not engaging in regulated activity<sup>4</sup> relating to children, but who will work unsupervised on school premises during the school day (8am to 4pm), an enhanced DBS check (not including children's barred list information) will be required.

The school's safeguarding requirements must be in the contract between the organisation that provides the contractor and the school.

Before any contractor, or any employee of the contractor, comes on site while pupils are present, the school must have received confirmation in writing that they have been subject to the appropriate checks.

Confirmation must include:

- the name of the person who will be working on site
- the specific checks that have been done on that person
- the date those checks were done

#### Independent workers

If a self-employed individual is engaged to work on site, the school will obtain a DBS check (and other checks as needed) as self-employed people are not able to make an application directly to the DBS on their own account.

#### Regulated Activity

Contractors engaged in regulated activity relating to children will require the same checks as teachers employed by the school.

Under no circumstances may anyone on whom no checks have been obtained engage in regulated activity relating to children.

---

<sup>4</sup> Regulated activity is "Teaching, training or instruction of children, carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period, or overnight"

## Appendix 27

### ‘Adultification’ of Children

‘Adultification’ is the process of perceiving and then treating certain children as being more adult-like and less innocent than they are. For example, black children or those in post-16 education settings are often assumed to have an ‘adult’ mentality, despite their legal status as minors. The potential ramifications of adultification are bleak: if a child is seen as self-sufficient, aggressive, or as less vulnerable, their needs and legal right to be safeguarded may be overlooked, forgotten, and disregarded. This puts many children at risk of exploitation and abuse.

#### **Adultification can look like:**

- The hyper-sexualisation of black girls and other minors who may be perceived as promiscuous, or seductive. Girls may find themselves framed by adults as ‘Lolita’ or ‘Jezebel’ characters, simply for wearing the same clothes as the other children (for example, the same PE kit).
- Less lenient treatment of certain students who commit normal, immature ‘transgressions’ like talking back, using explicit language, and breaking other rules.
- Excessive force used to restrain or search a minor that would not be used against other minors. Racial bias and racism both form a central part of the conversation around adultification. Black and other minority ethnic children are the primary victims of adultification. Data released by the Metropolitan Police showed that between 2019 and 2021, 5,279 children were strip searched by the force, 75% of whom were from a Black, Asian or other minority ethnic background.

Jahnine Davis, one of the UK’s leading safeguarding specialists says of black children that, unlike white children, they are seen through a lens of deviancy and [are] not necessarily acknowledged as deserving victims.

*“Black children are excluded from vulnerability. The question is, do professionals perceive them as vulnerable? Unfortunately, because Black children are framed and depicted in a certain way, they are not afforded that vulnerability. The impact could lead to Black children seeing themselves as ‘less than’, and potentially normalising this form of devaluation.*

*Black children are more likely to be met with suspicion than care.”*

### **The Police and Criminal Evidence Act (PACE) Code C**

The Police and Criminal Evidence Act (PACE) Code C, states that minors must be accompanied by an appropriate adult when searched unless they explicitly ask not to be.

All children should be safeguarded and protected by all members of the community.

It is vital that all school staff are aware of PACE Code C and make sure that minors are accompanied during strip searches.

It is also clear that staff should be conscious of their own biases, assumptions, and stereotypes, and should treat all students under the age of 18 as children.

## Child Q

In December 2020, a 15-year-old girl at a Hackney school was strip searched by police whilst on her period and without an appropriate adult present. She was suspected of having drugs on her person. To protect her identity and in respect of her minor status, she is referred to as 'Child Q'.

City and Hackney Safeguarding Children Partnership published a safeguarding review which found racism was likely an 'influencing factor', and this prompted large protests across Hackney Central and the rest of East London in March 2022.

The review also found that the handling of Child Q was 'disproportionate and ultimately harmful', with 'adultification bias' likely another 'influencing factor'. It was found that no questions were asked with regards to her safety or whether she was being exploited.

The Police and Criminal Evidence Act (PACE) Code C was ignored by police in this incident. No one consulted a supervising officer beforehand, which was also a breach of the rules.

The Metropolitan Police are now trialling a new policy in Hackney and Tower Hamlets where any strip search of a child will need approval from an inspector, in the hope that this will prevent future safeguarding errors.

*'The repercussions on Child Q's emotional health were obvious and ongoing. Given the context of where and how the search took place, it was impossible not to view these circumstances as anything other than the most serious and significant.'*

## Appendix 28

### Filtering and Monitoring of internet use at school

All staff should be aware of how the school filters and monitors the pupils' access to the internet.

Our systems are set up with regard to the DfE's [Guidance on filtering and monitoring](#)

The school's wifi system automatically blocks sites that may give access to inappropriate or harmful content. All social media sites are blocked.

The students have their own wifi and this automatically switches off at break and lunch times.

The system records all sites accessed at school and by whom they were accessed and this is monitored by the designated staff member, Grace Oladeinde, who will alert staff or the DSL if there are any concerns.

Pupils below Class 11 are not allowed to use Smartphones at school and these are handed in at registration and returned at home time.

Students in Classes 11 and 12 are allowed to use their Smartphones in their classrooms. This freedom is in acknowledgement of their maturity and our trust, both of which are important as they become more independent, however, students are aware that it will be withdrawn if it becomes necessary.

High School students have laptops which they use in lessons for writing and research, but they only have access to the internet during lesson time. For more detail see the [Policy for the use of electronic media](#).

For more information about how the school promotes safe internet use, see the [E-safety curriculum policy](#) and [Online media usage guidance for parents](#)

The DSL and the trustee with responsibility for Safeguarding are responsible for ensuring that these filtering and monitoring systems are effective.

#### Useful Links

A link to the government's 'plan technology for your school' service can be found [here](#). This can be used to assess the school's filtering and monitoring standards and receive recommendations on how to meet the standards.

The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

## Appendix 29

### Affluent Neglect

Neglect is defined above as 'a pattern of failing to provide for a child's basic needs'. All kinds of neglect are likely to result in the serious impairment of a child's health or development, however, the incidence of the kinds of neglect which occur in affluent families has risen in recent years:

- In wealthy families, parents may work long hours, leaving children in the care of child minders. This can create an emotional disconnect and leave children feeling lonely.
- Affluent parents may put more pressure on their children to succeed academically, which can lead to stress and emotional problems for the children.
- Parental alcohol and substance abuse, domestic violence and parental mental illness (known as the toxic trio) are found in affluent families as well as poorer ones and have lasting effects on the children in the home.
- Wealthy parents may have a more relaxed attitude to the risks their children take, or aren't sufficiently present to know what their children are doing. This can lead to increased risks for their children, who have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.
- Emotional neglect, exposure to the toxic trio, and lack of supervision sometimes faced by children from affluent families are considered to be **adverse childhood experiences** (ACEs). They have a lasting impact and can lead to long-term mental and physical health problems.

#### Why is it difficult to spot?

- The Child's experience in cases of affluent neglect is often emotional, which makes it much harder to identify. For example, when the family has an au pair to care for the children they will present as clean, tidy, well-dressed, and properly fed and this can mask an experience of emotional neglect.
- Staff training often focuses on case studies of children from poor or working-class families, so staff may not be looking for neglect among their wealthier families.
- It is more often the case that poorer families where neglect is an issue are already known to social services, so staff are alert to these children. Wealthy families are not often 'on the radar' of protective services.
- Affluent families may be resistant or hostile towards agencies such as social services or the local authority, or take offence at the school and make a formal complaint. This can divert attention from the children and makes it more difficult to help them.
- Staff may assume that wealth protects children from neglect and so they are less likely to be alert to it. New clothes and designer labels are not usually associated with neglect.

#### Training, Advice and Support

The Child Protection training that all staff undergo annually includes a module about how to spot and handle suspected incidences of affluent neglect. As in all cases of suspected abuse or neglect, the first action is to consult the DSL.

September 2025

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke.

In addition, Farrer & Co have created a helpful document to support schools in handling cases of affluent neglect in schools. You can find it **here**.

Approved by the Trustee with Responsibility for Safeguarding

To be reviewed: September 2026 (or as legislation is updated) by DSL, DDSL and the trustee with responsibility for Safeguarding.