

Church Street Family Hub, including:

- Portman Early Childhood Centre Nursery School
- Church Street Children's Centre
- Maida Vale Children's Centre

Safeguarding and promoting the welfare of children policy, including child protection procedures, 2023-24

This policy directly references and should be considered in relation to the following local policies and information documents:

- Staff Handbook/Behaviour Policy; our *Code of Conduct*.
 - Teaching and Learning policy
 - Working with Up to 3's policy
 - Learning Environment policy
 - SEND policy
 - Equal Opportunities policy
 - Anti-Bullying policy
 - Behaviour policy
 - Health & Safety policy
 - Race Equality policy
- Local Authority Safeguarding contact details sheet.
- Safeguarding induction documents, incorporating a description of Centre pedagogy, families/cause for concern meetings, Children's Centre Early Access and Support Team meetings (EAST) terms of reference and guidance, North East Locality Early Help Support Panel (0-19yrs) terms of reference. Also included are collated case studies – practical examples of how we demonstrate our safeguarding practice across protection from harm, prevention of harm and the promotion of children's welfare.
- Safeguarding professional and centre development documents.

Additional guidance, policy and procedure is contained within:

- Keeping Children Safe in Education (includes full statutory safeguarding guidance for staff, Safer Recruitment and Allegations Against Staff guidance)
- Statutory Framework for the EYFS – the safeguarding and welfare requirements
- Working Together to Safeguard Children
- 'What to do if you're worried about a child being abused'
- Threshold information and guidance - risk, resilience and protective factors.

Next review: September 2024

Updates to 2023-24 policy summarised as follows:

- New emphasis on filtering and monitoring systems – online safety
- Clearer distinction between children who are absent from education vs. children missing education
- Safeguarding Statement appended
- Appendices and some forms of language used across the policy have been updated to reflect most recent guidance – highlighted in [blue](#)

Introduction:

All staff working across Church Street Family Hub including Portman Early Childhood Centre Nursery School, Church Street and Maida Vale Children's Centres, fully recognise the contribution they make to safeguarding children, early intervention and early help, and to promoting children's welfare. We recognise that all staff, including volunteers, have a full and active part in protecting children from harm. Safeguarding is everyone's business.

We believe that our Centre should provide a caring, safe and stimulating environment which promotes the physical, cognitive, social and emotional development of all children using the Centre.

Our policy and procedures are reviewed annually and updated to reflect new or amended statutory guidance.

All new members of staff will be given a copy of our safeguarding and child protection policy and procedures as part of their safeguarding induction pack, and induction process.

All visitors to the Centre are given a copy of our 'Safeguarding Statement' (appended).

Definitions:

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring 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

Child protection is a part of safeguarding and promoting welfare. It refers to the action that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Effective child protection is an essential part of our safeguarding role. All agencies and individuals should also, however, aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

The aims of this policy are:

- To support children's development in ways that will foster security, confidence and independence.
- To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse or the risk of abuse.
- To provide a systematic means of monitoring children known or thought to be vulnerable or at risk of harm.
- To emphasise the need for good levels of communication between all members of staff.
- To explain the system and procedure which will be followed by all staff if they are worried about a child's welfare or if they are being abused.
- To develop and promote effective working relationships with other agencies.
- To ensure safe recruitment; that all staff, students and volunteers in our Centre who have access to children or who have access to information, data or meetings concerning children have been checked as to their suitability via their references and DBS.

Supporting and Safeguarding Children

We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self worth. In addition, a child in these circumstances may feel helpless and humiliated.

We recognise that the Centre may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggressive or withdrawn.

We will support **all** children using the Centre and provide a safe environment by:

- Encouraging self esteem and assertiveness whilst not condoning aggression or bullying.
- Promoting a caring, safe, reassuring and positive environment for children using the Centre's services.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children's welfare.
- Notifying Children's Services (Social Services and/or local authority Early Help teams) as soon as there is a significant concern.
- Providing continuing support to a child about whom there have been concerns who leaves the Centre by ensuring that appropriate information is forwarded to the child's new setting.
- Knowing our children and families well.
- Establishing and maintaining positive relationships with parents, carers and professionals.
- Understanding the challenging behaviour of those children experiencing difficulties.
- Applying consistent approaches and strategies, and providing a safe environment.
- Being reflective in our practice.
- Keeping ourselves up to date and aware.
- Recording accurately.
- Sharing anxieties and worries and actively using forums for discussing observations of children and families that may be cause for concern.
- Listening to children.
- Being clear about what might constitute significant harm.
- Having an awareness of our body language and its potential impact.
- Not making judgments on our own – target our questions to those who can help.

Guiding principles

1. The needs of the child are paramount and should underpin all of our work with children and families and resolve any conflict of interests.
2. All children have the right to achieve their potential.
3. Equalities: All children have the right to be safeguarded from harm and exploitation whatever their:
 - Race, religion, first language or ethnicity
 - Gender or sexuality
 - Age
 - Health or disability
 - Location or placement
 - Political or immigration status

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

4. Responsibility for the protection of children must be shared because children are only safeguarded effectively when all relevant agencies and individuals accept responsibility and co-operate with one another.
5. Statements about or allegations of abuse or neglect made by children must always be taken seriously.
6. The wishes and feelings of children are vital elements in assessing risk and formulating protection plans, and must always be sought and given weight according to the level of understanding of the child.
7. During enquiries, the involvement and support of those who have parental responsibility for, or regular care of a child, should be encouraged and facilitated, unless doing so compromises that enquiry or the child's immediate or long term welfare.

Responding to disclosure

If a disclosure is reported to you:

1. Ensure the child is **safe and reassured**. Respect their right to privacy and time to talk without interruption.
2. **Listen** to what is being said to you without pressure, judgement or horror. Do not ask leading questions. Always believe what the child has told you. A child who is freely recalling significant events should not be interrupted.
3. **Reassure** the child calmly and gently that they have done the right thing in telling you. Do not promise confidentiality. You must inform the Head of Centre or Headteacher. Explain to the child that to keep them safe, you must pass on the information that they are telling you. Tell them what will happen next, who you will tell and when.
4. **Do not** ask the child to remove any item of clothing to show you any injuries.

5. **Report** what has been disclosed to the Head of Centre or Headteacher as soon as possible.
6. **Record** in a clear and precise way what the child has told you as soon as possible whilst it is still fresh in your mind.

Staff roles and responsibilities

All staff are aware of and will carry out the policy and procedures set out in this document.

All staff are aware of the four categories and definitions of abuse and factors associated with this abuse - see Appendix 1: 'Recognition and Response'.

All staff are aware of, and are vigilant in monitoring the needs of children and are alert to factors or circumstances which might determine worrying behaviour or the failure of a child to learn or thrive.

All staff accept that it is an essential part of their job to liaise with other agencies on behalf of the child and that regular contact with home, Children's Services (Social Services and/or local authority Early Help teams) or other relevant agencies may be necessary.

Training will be provided and undertaken by all staff members relating to the identification of children in need of protection and in the application of safeguarding and child protection policies and procedures.

The **Designated Safeguarding Leads (DSL)** are the Head of Centre and Headteacher.

Some extended and partner Family Hub and Children's Centre services, such as Family Lives Outreach, Volunteer and Befriending services, HomeStart, Dream Arts, Westminster Adult Education Service, Health Visiting etc. have separate line management systems from the Westminster City Council employed staff across the Nursery School and Children's Centre. They therefore have distinct safeguarding and child protection

policies and procedures. However, the Head of Centre and Headteacher are available to offer support and advice around safeguarding issues.

CHILD PROTECTION PROCEDURES

1. If a member of staff has concerns about a child's welfare or feels that a child has been harmed, or is likely to suffer harm or abuse, or if a child has disclosed abuse to them, they should notify the Head of Centre or Headteacher at the earliest opportunity.
2. The staff member should make a written note of their observations and interaction with the child as soon as possible using the 'cause for concern' recording sheet. This record should include:
 - The child's name and age
 - The date, time and place
 - The nature of the suspected harm, abuse or disclosure
 - If anything was observed – e.g. marks, injuries, unusual behaviour
 - If anything was said by the child and your interaction with them – include information about the child's emotional presentation
 - If anything was said by another person – e.g. parent, peer, colleague
 - Whether any other person was present and/or involved
 - Action taken at the time
3. When given the information, the Head of Centre or Headteacher will decide whether to:
 - Take no further action at the time. (This does not preclude a referral being made at a later date).
 - Seek advice or pursue gathering further information – this may include further discussion with the parent or carer of the child.
 - Refer the matter to Children's Services.
4. Making a referral – if a decision is taken to refer to Children's Services, either by telephone or via a referral form, written confirmation should be sent within 24 hours.

If the child already has a Child Protection Plan, the referral should be made directly to their allocated Social Worker, their manager, or in their absence, the Duty Officer. If the child has an allocated Social Worker (for example, is a looked after child or the child has a child in need plan), the referral should be made directly to them or their manager, or in their absence, the Duty Officer. If the child has an allocated local authority Early Help Practitioner (Children's Services), the referral should be made directly to them or their manager, or in their absence, the Duty Officer.

The Head of Centre, Headteacher or instructed member of staff, will make the referral to Children's Services.

The referrer should be contacted by Children's Services within 24 hours and notified of actions to be taken following the referral.

Early Intervention and Early Help

All staff recognise that when a child or family may be experiencing difficulties, support is most effective if it is provided as early as possible. This involves:

- identifying emerging problems through discussing, analysing and reflecting on our observations of children and families,
- sharing information with other professionals to support early identification,
- providing responsive initial support,
- liaising with colleagues, the Head of Centre and/or Headteacher
- acting as lead professional in undertaking co-ordination of the support of a child and family where appropriate.

If appropriate support is not available within the Centre's own resources and extended partnerships, a referral to Children's Services Early Help Team will be completed to support the identification of the child's needs and enable additional support to be sought from other agencies.

Children's information

We recognise the importance of keeping up-to-date and accurate information about children. We will regularly ask all parents/carers

to provide us with the following information and to notify us of any changes that occur:

- names and contact details of persons with whom the child normally lives,
- names and contact details of all persons with parental responsibility,
- emergency contact details,
- details of any persons authorised to collect the child (if different from above),
- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.),
- name and contact detail of G.P.
- relevant health and medical information,
- any other factors which may impact on the safety and welfare of the child.

Failure to collect a child or inability to care

- If a child is not collected or "abandoned", OR
- The collecting adult appears to be under the influence of alcohol, drugs or solvents and unable to provide appropriate supervision, OR
- The collecting adult appears to be mentally distressed and unable to provide appropriate supervision,

The Head of Centre or Headteacher will contact Children's Services for advice and guidance or request police assistance and inform Children's Services of this action.

Attendance monitoring

Attendance is monitored by practitioners (in the case of nursery children, the 'Family Worker'/keyworker), administrative staff and leadership. Extended periods of absence, unexplained absence, unusual attendance patterns and/or repeated late attendance are reported to the Head of Centre or Headteacher. Additional monitoring takes place during bi-termly 'Children and Families Causing Concern' meetings.

OTHER POLICY STATEMENTS AND COMMITMENTS

Children with Special Educational Needs and Disabilities

- We recognise that children with SEND may be especially vulnerable to abuse and we will therefore take extra care to analyse our observations of possible signs of abuse or neglect.
- We will ensure assumptions are not made that indicators of abuse (such as behaviour, mood and injury) relate to the child's additional need or disability without further exploration.
- We will provide an environment in which all children, including those with SEND, can feel confident, are understood, and are enabled to communicate their wishes, feelings and concerns.
- The Head of Centre and Headteacher will work with the SENCO where necessary to ensure that the safeguarding needs of children with SEND are considered and responded to appropriately.

If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by informing the Head of Centre or Headteacher. If you have a mental health concern that is **not** also a safeguarding concern, speak to the Head of Centre or Headteacher to agree a course of action.

Confidentiality

- We recognise that all matters relating to Child Protection are confidential.
- The Head of Centre or Headteacher will only disclose information to other staff on a “need to know” basis.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child or parent/carer to keep secrets.

Supporting Staff

- We recognise that staff working across our Centre who have become involved with a child who has suffered harm, or appears likely to suffer harm may find the situation stressful and upsetting.
- We will support staff by providing an opportunity to talk through their feelings with the Head of Centre or Headteacher and to seek further support as appropriate.

Allegations against staff

- We understand that a child, parent or carer may make an allegation against a member of staff.
- If such an allegation is made, the member of staff receiving the allegation will immediately inform the Head of Centre or Headteacher unless the allegation is about the Head of Centre or Headteacher.
- If the allegation made to a member of staff concerns the Head of Centre or Headteacher, the member of staff must speak to the DSL who is not the subject of an allegation, and they must contact the Local Authority Designated Officer (LADO) and Chair of Governors immediately.
- The Head of Centre or Headteacher on all such occasions will discuss the content of the allegation with the LADO.
- The Centre will follow the Local Authority and DfE procedures for managing allegations against staff.
- **If the Centre receives an allegation relating to an incident where an individual or organisation is using the Centre premises for running an activity for children, the DSL should**

follow safeguarding policies and procedures and inform the local authority designated officer (LADO), as per any safeguarding allegation.

- The Head of Centre, Headteacher or Chair of Governors may contact the LADO for consultation at any time.
- See appendices for further detail.

Safe Recruitment

- All members of staff including supply staff and regularly engaged volunteers, must have a current enhanced DBS.
- New staff employed on a permanent basis by the Centre will undergo a new enhanced DBS.
- All staff will require re-checking.
- See appendices for full details.

Whistle Blowing

- We recognise that children cannot be expected to raise issues that worry them if they feel unsafe or they feel that they will not be taken seriously or where staff fail to act in response to their concerns.
- All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues in regard to their behaviour or treatment of children.

Acceptable Physical Intervention or Restraint

- Our policy on physical intervention by staff is set out in a separate behaviour policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury to the child themselves, or another person.
- We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

Domestic Abuse

- Domestic abuse is a safeguarding and child protection issue. Any child or young person who has been witness to or involved in incidents of domestic abuse will have suffered a

degree of trauma and is likely to be at risk of emotional damage and/or physical injury.

- Allegations of domestic abuse or the risk of children witnessing such incidents will be referred to Children's Services.

Child Trafficking and Sexual Exploitation

- The Centre has a clear system for requesting proof of identity, that parents/carers are who they say they are and confirm who has parental responsibility.
- The Centre has procedures for passing information on when children move.
- The Centre will contact Children's Services if children do not return or they are being removed from roll without a known transfer setting.

Racist Incidents

- Our policy on racist incidents and race equality is set out in a separate policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

Health and Safety

- Our Health and Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both within Centre environments and when away from the Centre when undertaking trips and visits.

The Prevent Duty

We have a duty to keep children safe from the dangers of radicalisation and extremism. The EYFS focuses on children's personal, social and emotional development, supports children in age appropriate ways to learn right from wrong, mix, and share with other children, value others views, know about similarities and differences between themselves and others, and fosters an environment that challenges negative attitudes and stereotypes.

Our team approach, integrated pedagogy and focus on building meaningful relationships with children, parents and extended family members, helps us identify potentially vulnerable children and adults.

Protecting children from the risk of radicalisation is part of our safeguarding duty and should be responded to as such. All staff should receive Prevent awareness training.

Safe use of ICT (e-safety)

- Staff are not permitted to use their mobile phones or personal cameras whilst working with children. Staff mobile phones and other electronic devices should be stored in staff lockers during their contact time with the children, and may only be used in the staff room during breaks or non-contact time. During educational visits, staff mobile phones may be used for specific duties and emergencies during the time of the visit.
- Parents are also asked not to use mobile phones or cameras in any area of the nursery. Staff should seek the assistance of the head teacher or a senior member of staff if parents are reluctant to comply with this request.
- Staff may only use school cameras to take photographs of children, to record children's progress and achievements, celebrations and events, to be used for observations in children's profiles, on displays, and with permission in the school newsletter or on the website. Photographs must be stored appropriately, in the shared Multimedia drive.
- We follow advice and guidance from the Local Authority with regards to ensuring that computers with internet access in the classroom, which children may access, have suitable filtering to ensure children are not exposed to inappropriate content. Further advice and guidance is available at <https://www.lgfl.net/online-safety/default.aspx> (the online safety portal for London Grid for Learning)
- Staff must be alert and aware that whichever search engine is used, the risk of inappropriate search results cannot be completely eliminated. If planning to use particular websites,

for example “youtube” to show music videos or stories, staff should check content before displaying to the children.

- Children’s usage of smart-boards and PCs that have internet access should be closely supervised and monitored by staff, to ensure that children do not unwittingly access inappropriate content
- During sessions using ICT such as smart-boards, staff should teach children that they need an adult present when accessing the internet, for example explaining that children may see something on the internet that scares them.
- The DSL is responsible for ensuring appropriate filtering and monitoring processes are in place – see additional ‘Online Safety’ policy, that online safety training is included in staff safeguarding training and the DSL oversees the safe use of technology, mobile phones and cameras in the setting (specific EYFS reference) and that these arrangements are reviewed annually.
- Governors are responsible for:
 - Making sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
 - Reviewing the DfE’s filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
 - Making sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
 - Making sure that all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and in line with advice from the safeguarding partners
 - Making sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Parents will be supported in understanding the importance of online safety, in nursery and at home.

Appendix

Church Street Family Hub, Portman Early Childhood Centre Nursery School
and North East Locality Children's Centres

***Safeguarding is protecting children from harm, preventing harm, and
promoting children's welfare***

Cause for Concern Record Sheet

Date:

Name of Child:

Your name:

Description of your concern:

Signed:

***Your concern must be shared with Amie Curtis – Acting Headteacher and/or
Peter Watt – Acting Head of Centre, Designated Safeguarding Leads**

Initial action taken: (Amie or Peter will complete this part)

Decision: (Amie or Peter will complete this part)

Signed:

Date:

Notes/guidance:

Amie and/or Peter will:

- Assess any urgent medical needs of the child.**
- Consider if early help can be offered to support and prevent the child's needs escalating.**
- Consider whether the child has suffered, or is likely to suffer significant harm.**
- Check whether the child is currently subject to a Child Protection Plan, has an allocated Social Worker or local authority Early Help Practitioner.**
- Confirm whether any previous concerns have been raised by staff.**
- Consider whether the matter should be discussed with the child's parents or carers or whether to do so may put the child at further risk of harm because of delay, or because of the parent's possible actions or reactions**
- Seek advice if unsure that a child protection referral should be made**

Additional appendices

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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- [Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process](#)

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

Regulated activity means a person who will be:

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

Existing staff

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

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

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

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

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

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

Governors

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

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

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

Adults who supervise pupils on work experience

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

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

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or

carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

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

Responding to low-level concerns

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

- Directly to the person who raised the concern, unless it has been raised anonymously

- To the individual involved and any witnesses

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

Record keeping

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

Records will be:

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

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

References

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

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

Appendix 4: specific safeguarding issues

Children who are absent from education

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

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

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

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing

- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

Child sexual exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

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

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

Child-on-child abuse

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

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

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

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

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

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

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

Homelessness

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

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

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

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

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

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

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

FGM

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

[It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used](#)

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

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

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be by prior appointment and asked to show photo ID.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Missing pupils

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

Make a 'child missing in education' referral to the local authority after 10 working days of reasonable checks being carried out by the DSL.

Appendix – Safeguarding Statement

To all Visitors – Welcome to Portman

Safeguarding Children at Portman Early Childhood Centre Nursery School, Church Street Family Hub and Children’s Centre and at Maida Vale Children’s Centre

All staff and Governors at Portman recognise our moral and statutory responsibility to safeguard and promote the welfare of all children and to provide a safe and welcoming environment where children are respected and valued. We understand that a safe and secure environment gives a child the best chance to learn and develop and maximises their chances of having a happy, healthy, and successful life.

The safety of all children is our priority. Our safeguarding policy sets out what we will do if we are worried about the welfare of any child using our services. It also explains how the Centre approaches other aspects of safeguarding, such as prevention of harm, and the promotion of children’s welfare, learning and development. Parents and carers are our partners in these processes. **Safeguarding is everyone’s business.**

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. While working in our school **we expect you to support us in ensuring the safety of the children attending and to follow our procedures.** Our policy and procedures are reviewed annually. A copy is available on request.

Key facts about child abuse

Abuse and neglect can happen to any child, boy or girl, of any race, culture, ethnicity or sexuality. Disabled children and children with special educational needs are particularly vulnerable.

Many children are unable to disclose what is happening to them and rely on us to interpret their behaviour and spot signs of abuse. A child may:

- Have a bruise, burn or injury that seems suspicious
- Show signs of pain or discomfort
- Be unnaturally passive or withdrawn
- Be unpredictable and challenging
- Seem anxious, fearful or distressed
- Provide an unlikely explanation for their injury or their behaviour

If you are concerned about a child’s health, welfare or safety you must speak with one of our **Designated Safeguarding Leads (DSLs), Amie Curtis (Headteacher) or Peter Watt (Head of Centre) before you leave Portman.** We would rather you share your concerns, even if you worry that you are unsure, rather than delay any necessary action.

If you are concerned about a child’s **immediate safety**, notify the nearest member of staff and tell them why you are concerned.

If you have concerns about a member of staff, please speak to DSLs Amie Curtis or Peter Watt. The telephone number for reporting concerns about children to Westminster Children's Services is 020 7641 4000.