# The St Luke's and Moreland Federation Safeguarding & Child Protection Policy 1st September, 2025

## based on Keeping Children Safe in Education, 2025

### Key Safeguarding Contacts

Designated Safeguarding Leads (DSL): *Francesca Bear and Ben Williams (St Luke's), Dominic Ebbasi (Moreland) and*

Deputy Designated Safeguarding Leads: *St Luke's: Keith Grey, Anisa Lucey, Vicki Hills. Moreland: Catherine Lawrence, Daniela Fisher-Munoz, Sophie Eleftheriou, Charmaine Doherty-Carvalho,*

Other members of the Safeguarding Team (not DDSLs) are*:*

*Moreland: Sherren McCallum and Bobbie Robinson – Sherren and Bobbie are DDSLs during the school holidays for 0-3*

Designated Governors for Safeguarding: *Revd Canon Jack Noble, Ruth Grant and Jo Honigmann*

Designated Teachers for Looked After Children/Previously Looked after Children: *Tom O'Donnell (St Luke's) Daniela Fisher-Munoz (Moreland)*

Attendance Lead: *Tom O'Donnell, Dominic Ebbasi*

Prevent Lead: *Tom O'Donnell, Dominic Ebbasi*

Senior Mental Health Lead: *Keith Grey (St Luke's) and Dominic Ebbasi (Moreland)*

The Designated Manager for Allegations against Staff and Volunteers is *Catherine Lawrence (During school holidays Charmaine Doherty-Carvalho) (Moreland) and Tom O'Donnell (St Luke's)*

The Designated Manager for low-level Concerns is: *Tom O'Donnell (St Luke's) and Dominic Ebbasi (Moreland) (During school holidays Charmaine Doherty-Carvalho)*

Any references to DSL in this policy refer to any member of the DSL team including deputies

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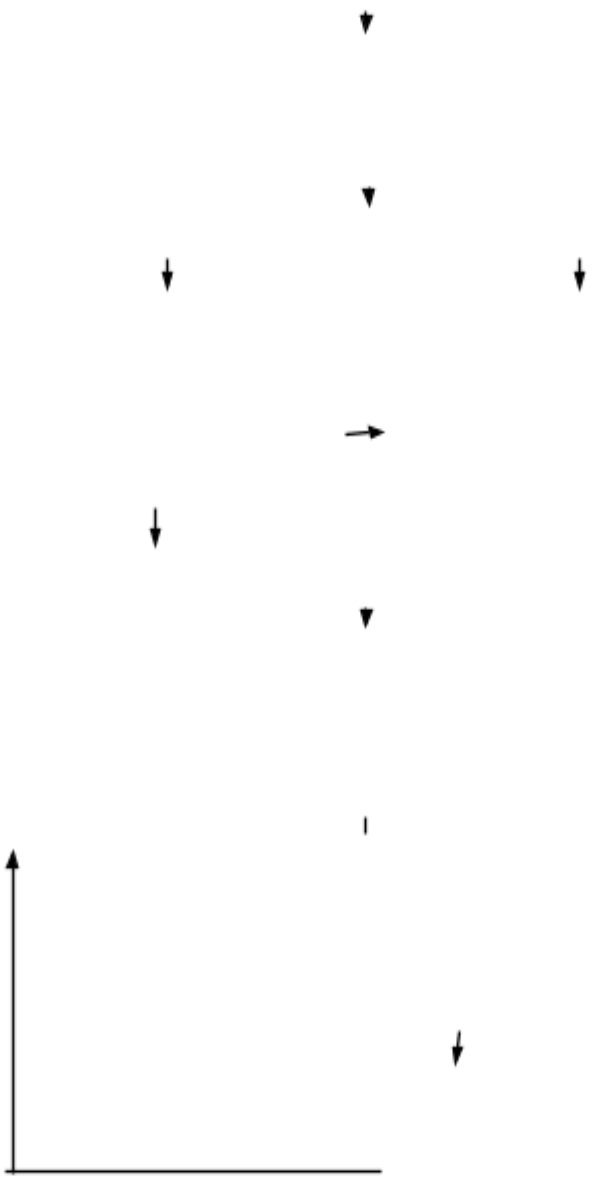
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# Flowchart

(please also see Flowchart on Page 24 of KCSIE 2025)

What to do if you have a safeguarding or welfare concern



## Record your concerns

Follow the setting's procedure on sharing information

- If responding to a disclosure reassure the child and clarify concerns if necessary e.g. ambiguous words and phrases
- Use child's own words and indicate any marks on body map charts, as appropriate
- Sign and date all records

**Immediately inform a Designated Safeguarding Lead (see contact information on page 1)**

### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Refer to ISCP Threshold document and procedures to support consideration: www.iscp.org.uk
- Refer to other agencies as appropriate e.g. Children's Services Contact Team (CSCT) LADO, Police.
- If unsure then consult with CSCT, without giving child's details (0207 527 7400)

**If you are unhappy with the response**

**All Staff:** Follow ISCP Escalation policy and procedures

**Pupils and Parents:**

- Follow Setting complaints procedures (information available on both school websites)
- If there is poor or unsafe practice in your setting, follow the Whistleblowing Policy (information available on both school websites)
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At all stages the child's circumstances must be kept under review.

The DSL/staff will re-refer or escalate if required to ensure the child is safeguarded and protected

**Record decision making and action taken in the child's safeguarding/child protection file. Set up new file if this is the first concern.**

**Start chronology or enter any key information if already in place**

**Monitor** Be clear about:

1. What you are monitoring e.g. behaviour trends, appearance, attendance etc.?
2. How long you will monitor for?
3. What information needs to be shared, why and with whom?
4. How you will record and to whom you will feedback and when?

**Review** and **Re-refer** (if necessary)

(Insert details here)

**You have a concern about a child**

For example

- A child or someone else has disclosed or reported a concern
- Child's appearance – unexplained marks and bruises, clothes, hygiene, general appearance
- Change in behaviour, presentation, attendance, progress and attainment
- Behaviour which causes concern, indicates risk/vulnerability

1. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.

2. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children[1]

*a.* The Federation of Moreland and St Luke's recognises the importance of creating and maintaining a safeguarding culture that will help all pupils to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are committed to providing an environment where children can play, learn, develop and achieve and where they are safeguarded and are enabled to disclose if they are being harmed in some way. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all pupils receive effective support, protection and justice.

*b.* We recognise that some children may be especially vulnerable to abuse. We understand that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Behaviour may be challenging and or concerning and at times this may impact on other children either directly or indirectly. We will always take a reflective, considered and sensitive approach in order that we can support all of our pupils.

c. Our Setting's core safeguarding principles are:
- That schools are an important part of the wider safeguarding system for children.
- It is a whole school responsibility to safeguard and promote the welfare of children
- All children (defined as those up to the age of 18) have equal rights to protection regardless of age, gender, ability, culture, race, language, religion or sexual identity
- All children have a right to be heard and to have their wishes and feelings taken into account
- All staff understand safe professional practice and adhere to our code of conduct and other associated policies
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this policy

Please note that the procedures contained in this policy apply to all staff (including teaching and non-teaching, temporary staff and volunteers) and governors and are consistent with the London Safeguarding Children Procedures

## Definitions

[2]Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act, other aspects of care and education are related:

- children's and learners' health and safety and well-being, including their mental health
- meeting the needs of children who have special educational needs and/or disabilities (SEND)
- the use of reasonable force
- meeting the needs of children and learners with medical conditions
- providing first aid
- educational visits
- intimate care
- emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure children's and learners' security, taking into account the local context

Within this document:

- Safeguarding is defined as:
- Providing help and support to meet the needs of children as soon as problems emerge

[1] Keeping Children Safe in Education (DfE, 2025)
[2] Inspecting safeguarding in early years, education and skills - GOV.UK (www.gov.uk)

- protecting children from maltreatment, whether that is within or outside the home, including online
  • preventing the impairment of children's mental and physical health or development
  • ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
  • taking action to enable all children to have the best outcomes
- **Child Protection** is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

- **Staff** applies to all those working for or on behalf of the Setting, full time or part time, in either a paid or voluntary capacity. This also includes governors.

- **Child** refers to all young people who have not yet reached their 18th birthday or Looked After Children and SEND young people who have not yet reached their 25th birthday. The policy will also extend to visiting children and students from other establishments

- **Parent** refers to birth parents and other adults in a parenting role for example adoptive parents, step-parents, guardians and foster carers.

- **Abuse** could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the document and appendices 1 and 2.

## Context

a. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance (see below). In addition, Section 175 (Section 157 for academies and independent schools) of the Education Act, 2002 requires governing bodies of maintained schools and further education colleges (including sixth form colleges) to ensure they safeguard and promote the welfare of children who are either pupils at the Setting or who are students under 18 years of age attending the further education institution. KCSIE 2025 states that colleges include providers of post-16 education, 16-19 academies, special post-16 institutions and Independent Training Providers.

   Guidance includes the following and the links in Appendix 6 and 7:
   - Working Together to Safeguard Children 2023
   - DfE guidance Keeping children safe in education 2025 (publishing.service.gov.uk)
   - Teaching online safety in Schools (DfE, 2019)
   - London Safeguarding Children Procedures 7th Edition
   - Inspecting safeguarding in early years, education and skills - GOV.UK (www.gov.uk)
   - County Lines Professional Toolkit
   - Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
   - https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
   - The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)

b. All safeguarding policies will be reviewed on an annual (minimum) basis by the Governing Body which has responsibility for oversight of the safeguarding and child protection systems. The DSL/Head Teacher will ensure regular reporting on safeguarding activity and systems in the Setting to the Governing Body. The Governing Body **will not** receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

c. We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the Setting's integrated safeguarding portfolio and should be read in conjunction with any related policies. Please also see Part 1 and Annex B of KCSIE 2025

d. All staff and volunteers at The Federation of St Luke's and Moreland recognise that children experiencing specific safeguarding issues are no different to safeguarding against any other vulnerability or concern and will respond in the same way as they do to protect children from any other risks.

e. Supporting Guidance (to be read and followed alongside this document)

- What to do if you're worried a child is being abused - Publications - GOV.UK
- Information Sharing advice May 2024
- Guidance for Safer Working Practice 2022 :
- Mental health and behaviour in Schools - Publications - GOV.UK
- Working together to improve school attendance 2024
- Teachers' Standards
- Safeguarding Disabled Children Practice Guidance
- Preventing & Tackling Bullying
- Promoting children and young people's emotional wellbeing
- Public Health England Every Mind Matters - Teaching RSHE
- Education for a Connected World Framework - Teaching safeguarding and online safety
- Behaviour in Schools July 2022
- Suspension and Permanent Exclusion 2022

f. These documents linked above can also be found here These documents can be found here - Policy drive in 'Safeguarding Documents', DSL's office and staff room. They are also available to access via the school website https://www.moreland-islington.co.uk/ and https://www.st-lukesislington.co.uk/

## Safeguarding and Child Protection Procedures

- Any member of staff, volunteer or visitor to St Luke's and Moreland Primary Schools who is aware of a disclosure or allegation of abuse, or suspects that abuse may have occurred **must report it immediately to the DSL** (or, in their absence, the deputy DSL). See flowchart 'What to do if you are worried about a child/young person' on page 4 and the flowchart on Page 24 of KCSIE 2025.

- The DSL will immediately refer cases of suspected abuse or allegations, by telephone, to the CSCTReferrals@islington.gov.uk Children's Services Contact Team (CSCT) in Islington on 0207 527 7400 or the local authority where the child lives. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required) See https://www.gov.uk/report-child-abuse-to-local-council for local authority child protection referral contact details.

- [3]It is not necessary to seek consent from parents/carers to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required. In the spirit of collaboration, where possible, the Setting will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from CSCT and/or Police in making decisions about when it is appropriate to share information with parents / carers.

- If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, they should press the DSL for re-consideration of the case in order to reassure themselves the child is safe and their welfare is being considered. If after following this process, the staff member remains concerned that

[3] Working Together To Safeguard Children 2023

appropriate action is not being taken, it is the responsibility of that person to seek further direct consultation from the head teacher or safeguarding governor.

- If after a referral to CSC a child's situation does not appear to be improving, the DSL will request reconsideration to ensure that the referral concerns have been addressed and, most importantly, that the child's situation has improved. Professional disagreements (escalation) will be responded to in line with the ISCP procedures and DSLs may request support via the Principal Officer Safeguarding in Education (POSIE).

- These procedures apply to all staff working/volunteering in the Setting and will be covered in training to enable everyone understands their role and responsibility. The prime concern at all stages must be the interests and safety of the child. **Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.**

- All staff are aware that children with disabilities, special needs language delay and/or where English is not their first language may communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

- The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are worried a child is being abused. The Federation of St Luke's and Moreland adheres to the London Safeguarding Children Procedures. The full procedures and additional guidance relating to specific safeguarding issues can be found on the ISCP website www.islingtonscp.org.uk

- When new staff, volunteers or regular visitors join our Setting they are informed of the safeguarding arrangements in place, the names of the DSLs and how to share concerns with them.

- The headteacher will ensure that the policies and procedures adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

## Early Family Help – Bright Futures

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

  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is frequently missing/goes missing from care or from home
  - has experienced multiple suspensions, is at risk of being permanently excluded from schools and in Alternative Provision or Pupil Referral Unit
  - is at risk of modern slavery, trafficking, sexual or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a family member in prison, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing alcohol and other drugs themselves
  - has returned home to their family from care
  - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - is a privately fostered child, or
  - is persistently absent from education, including persistent absences for part of the school day.

- All staff are aware of the Early Family Help process and understand their role within it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. We will refer to and work within the revised 'Working Together to Safeguard Children' 2023 guidance at all times.
- If Early Family Help is assessed to be appropriate, then the DSL will support staff members involved with the family to initiate an Early Family Help Assessment by requesting services from Bright Start 5-19 through CSCTReferrals@Islington.gov.uk . The DSL will keep all Early Family Help cases under constant review and will give consideration to making a child in need or child protection referral if the situation doesn't appear to be improving for the child.

  The Governing Body, Headteacher and Leadership Team will ensure that the DSL team are properly supported in this role in relation to the availability of appropriate time, support and resources.

## Recognition and Types of Abuse and Neglect and Exploitation

- All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. This includes where children see, hear, or experience the effects of domestic abuse. Staff should be aware that abuse can take place wholly online and that technology may be used to facilitate offline abuse.
- There are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
  - All staff should be aware that child sexual and child criminal exploitation are forms of child abuse

- The most up to date definitions and possible indicators and signs of abuse are found in Annex 1 of KCSIE 2025. Staff should also refer to Part 1 and Annex B and 'What to do if you are worried a child is being abused' (2015).

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

- The warning signs and symptoms of child abuse and neglect and exploitation can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours' may also indicate child abuse or neglect, so staff are alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## Online Safety

1. We recognise that the use of technology presents particular challenges and risks to children and adults both inside and outside of Setting. The DSL and leadership team taken particular note of paragraphs 134-151 regarding Online Safety within KCSIE 2025.

2. Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSL when developing curriculum approaches or making technical decisions. However, the DSL retains overall responsibility for online safety and the setting's filtering and monitoring system.

3. We identify that the issues classified within online safety are considerable, but can be broadly categorised into four areas of risk:
    - content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories are all considered to be safeguarding harms.
    - contact: being subjected to harmful online interaction with other users; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
    - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
    - commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/ )

4. We recognise the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2025 and EYFS 2025 has appropriate policies in place that are shared and understood by all members of the Setting community.

5. Our approach to online safety will always consider the 4 cs above. We have clear rules relating to the use of mobile and smart technology that means pupils are not allowed to access their mobile phones. In doing so we are preventing and deterring the use of mobile phone networks during school time for pupils to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. This approach is also reflected in our online safety/behaviour/anti-bullying and acceptable use policies.

   There are risks associated with children accessing mobile phone networks at school including (but not limited to) potential use of inappropriate apps, viewing / creating inappropriate content, making inappropriate contact with others. To manage these risks the school has a strict policy that all pupils must switch off and hand in mobile phones and other devices (e.g. tablets and smart watches with internet connectivity) when they arrive at school. These are then returned at the end of the school day as children leave. This information is included in the home school agreement. On residential trips phones are kept by staff and given out at an allocated time for supervised use to phone family members and then collected.

6. We recognise that online safety is part of the whole school approach to safeguarding which includes:
    - Parental engagement with online safety
    - An appropriate level of security to protect users and their data
    - An annual review of our online safety procedures which include a risk assessment that reflects and considers the risks children face online
    - Curriculum planning
    - Teacher training
    - The role and responsibilities of the DSL team

7. Further information reading the specific approaches relating to this can be found in our Online Safety Policy, Acceptable Use Policies, Image Use Policy and Mobile Phone Policy which can be found in the policy drive and school websites.

8. We will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access the systems and internet provision. We will be careful to ensure that these systems do not place unreasonable restrictions on

internet access or limit what children can be taught with regards to online teaching and safeguarding. Details of this can be found in the Online Safety Policy.

9. All staff are expected to follow the Filtering & Monitoring Standards for Schools and Colleges and to alert the DSL if they come across anything accessible online that would be inappropriate for children. This includes if:

    - they witness or suspect unsuitable material has been accessed
    - they can access unsuitable material
    - they are teaching topics which could create unusual activity on the filtering logs
    - there is failure in the software or abuse of the system
    - there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
    - they notice abbreviations or misspellings that allow access to restricted material

10. We will communicate and reinforce to parents and carers how important it is that children are safe online and to inform them which filtering and monitoring systems are used in the setting. We will always let parents know what we are asking children to do online outside of Setting and the sites they will be asked to access and also which staff member they will be interacting with online (if any)

11. We will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively and will support parents and the wider community (including all members of staff) to become aware and alert to the need to keep children safe online. We will use the new department for education 'plan technology for your school service' for self-assessment against filtering and monitoring standards and receive personalised recommendations on how to meet them.

12. When using generative AI in Settings, we will follow the newly published Generative AI: product safety expectations to support us to use generative artificial intelligence safely. We will ensure we are up to date with the latest relevant guidance and will use the these links to support us further Generative artificial intelligence (AI) in education - GOV.UK and Using AI in education: support for school and college leaders - GOV.UK

## Learning at home

Where children are being asked to learn online at home the DfE has provided Providing Remote Education Advice for Schools and settings It is essential that children are safeguarded from potentially harmful and inappropriate online material. Staff with access to the Setting's devices are reminded about rules on the **misuse of technology** – devices used at home should be used just like if they were in full view of a teacher or colleague. Staff will:

- not use private accounts
- log all contacts
- log issues and concerns
- consider the increased vulnerability of pupils with SEND
- avoid private chats with pupils

## Learning at an Alternative Provision

We emphasise the importance of supporting all children, who often have complex needs, that are learning at an alternative provision. We are committed to our responsibility to ensure that appropriate safeguarding arrangements are in place at an alternative provision and we will always obtain written information from the provision that appropriate safeguarding checks have been carried out on staff that work at their setting.

We will ensure that we always know where a child who attends an alternative provision and have the full address of the provision along with any subcontracted provision or satellite sites the child may attend. We will review the provision being offered to any child at least half termly to assure ourselves that the child is attending regularly and that the placement continues to be safe and meet the child's needs. Where any safeguarding concerns arise, the placement will be immediately reviewed and terminated, if necessary, unless or until those concerns have been

addressed satisfactorily. We will follow the statutory department for education guidance, Arranging Alternative Provision 2025 to ensure that we are meeting our duties to safeguard our children and support their education.

# Key Roles and Responsibilities

All staff including teaching and non-teaching staff, temporary and supply staff, clerical and domestic staff, volunteers and staff working on site employed by other services and agencies and those working with children and families in the community, have a statutory responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with this policy. All staff must have access to this policy and follow its procedures and guidance at all times.

## The Governing Body

- The Governing Body holds overall responsibility for the child protection and safeguarding functions and will ensure that safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by Islington Safeguarding Children Partnership (ISCP), including local protocols for assessment and the ISCP threshold document.

- The governing body and senior leadership team are responsible for ensuring that robust recruitment procedures are followed that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place and follows LBI's Safer Recruitment Guidance. It ensures that volunteers are appropriately supervised while at work.

- We have a nominated governor for safeguarding, named on the front of this document. They take the lead role in ensuring that there is an effective safeguarding and child protection policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding children are reviewed at least annually. The governing body have read and will follow KCSIE 2025.

- A member of the governing body is nominated to be responsible for liaising with Islington Council's Local Authority Designated Officer (LADO) 0207 527 8101/02 in the event of allegations of abuse being made against the Headteacher. This name of this governor is

- Governors are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who does not already have one. As governance is not a regulated activity, they do not need a barred list check, unless, in addition to their governance duties, they also engage in regulated activity.

- For those staff engaged in management roles (in independent schools - including academies and free schools) an additional check is required to ensure they are not prohibited under section 128 provisions. [4] This includes all governors in maintained Settings.

- The Designated Safeguarding Governor is responsible for liaising with the Headteacher and DSL regarding safeguarding and child protection issues. **This is a strategic role rather than operational – they will not be involved in concerns about individual pupils.**

- Whilst the Governing Body holds overall responsibility for the child protection and safeguarding functions of the Setting, the day to day operational responsibility rests with the Headteacher.

[4] Section 128 of the Education and Skills Act 2008 provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent Setting (which includes academies and free schools).

## The Headteacher

The Headteacher is responsible for ensuring that:

- this child protection policy and other relevant policies and procedures, adopted by the Governing Body, are fully implemented and followed by all staff including volunteers
- sufficient resources and time are available to enable the DSL team to carry out their duties and case holding staff are able to take part in strategy discussions/meetings, initial and review child protection conferences, core group and Team around the Child Meetings and other inter-agency meetings which contribute to the assessment of children including writing reports for conferences
- all concerns about poor or unsafe practice regarding children, will be addressed sensitively and in a timely manner in accordance with the whistle blowing policy.
- there are robust systems in place to cover for the DSL's planned and unplanned absences from the Setting, including having Deputy DSLs who have the role added to their job descriptions.

## Designated Safeguarding Lead and Deputies (DSL)

- We have appointed members of the senior leadership team Francesca Bear, Ben Williams and Dominc Ebassi (Moreland) as the DSL. The senior DSL's has the overall responsibility for the day to day oversight of safeguarding and child protection systems in Setting. The Setting has also identified additional staff to deputise for when the DSL is not available.

- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by Islington Safeguarding Children Partnership in line with guidance set out in Competence Still Matters, 2014. The DSL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods e.g. e-Bulletins, the Safeguarding Newsletter, conferences, local meetings ie DSL Forum and ISCP CP Refresher training at regular intervals, at least annually, to keep up with any developments relevant to their role.

- During term time the DSL will always be available (during normal School or college hours) for staff in Setting to discuss any safeguarding concerns.

- In exceptional circumstances the DSL may only be available via video call or telephone and must ensure that there are clear and safe parameters in the use of this technology and will ensure the space is confidential, if the conversation is recorded and how this will be stored.

- The schools operate an on call system for any out of hours/ out of term activities with a nominated member of the safeguarding team being available via email.

- The DSL is the central contact point for all staff to discuss any safeguarding concerns and has lead responsibility for managing child protection referrals, safeguarding training and raising awareness of all child protection policies and procedures. They will ensure that everyone (including temporary staff, volunteers and contractors) is aware of this policy and our procedures and related policies and that they are followed at all times.

- The DSL maintains a confidential recording system for all safeguarding and child protection concerns and works closely with the Designated Teacher for Looked After Children and the Head of the Virtual School for all children who are looked after or have previously been looked after.

- The DSL team will familiarise themselves with the extended role of the Virtual School Head including promoting the educational achievement of children in kinship care.

- The DSL ensures that the Setting provides reports/updates and is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences and Team around the Child Meetings)

## Additional responsibilities for the DSL:

- Responsibility for online safety as well as safeguarding and child protection
- Responsibility for filtering and monitoring
- Working with mental health leads where safeguarding is linked to mental health
- Promoting supportive engagement with parents and carers
- Promoting educational outcomes of children in need by knowing and helping to address issues they have/are experiencing by:
    - Ensuring the Setting knows which children need a social worker, understand their academic progress and attainment and maintaining a culture of high aspirations
    - Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have/had a social worker reach their potential
    - Recognising the lasting impact on educational outcomes
    - Working with the Virtual School head to discuss how funding can best support looked after children
    - Working with the Virtual School Head to promote the educational achievement of previously looked after children and children in kinship care
- To work with the headteacher and 'relevant strategic leads' on information sharing:
    - Understanding the importance of sharing information with other Settings/colleges on transfers including in-year transfers and between primary and secondary education
    - Ensuring information in child protection files is kept confidential and stored securely
    - Ensuring that the child protection file is transferred to a new Setting/college within 5 days for an in-year transfer or within first 5 days of start of a new term.
- Training, knowledge and skills new expectations they have a good understanding of:
    - How to identify, understand and respond to specific needs that can increase the vulnerability of children
    - Specific harms that could put children at risk
    - The important role they play in providing information and support to CSC to safeguard and promote their welfare
    - The lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing, and what is needed to respond to this
    - The difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication
    - Children in need (children with disabilities, those with relevant health needs and young carers) who have specific need to be alert to

## Staff and volunteers

- Due to their day to day contact with children, staff are well placed to observe possible signs of abuse in children. All staff maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. ***It is not the role nor responsibility of those working with children to assess, diagnose or investigate whether a child is at risk of or suffering harm or abuse.*** It is the responsibility of all staff to be aware of the need to report any concerns about a child to the DSL team immediately.
- All staff have a responsibility to provide a safe learning environment in which our children can learn. They will ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience, including through curriculum development and planning
- Any child may benefit from early family help and all staff members are aware of the local early family help process and our role in it. They are aware of signs of abuse and neglect so they are able to identify children who may be in need of help or protection.

- All staff and volunteers take individual responsibility for knowing what to do if a child discloses, or they have concerns about abuse or neglect. Members of staff know how to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child.

### Children and Young People

- Children and young people will:
  - Contribute to the development of the safeguarding and child protection policies
  - Read and follow (at a level appropriate to their age and ability) the safeguarding policies and procedures
  - Seek help from a trusted adult if things go wrong and support others who may be experiencing safeguarding concerns
  - Develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online

### Parents and Carers

- Parents/carers have a responsibility to:
  - Discuss safeguarding issues with their children, support the Setting in their safeguarding approaches, and reinforce appropriate safe behaviours at home
  - Identify changes in behaviour which could indicate that their child is at risk of harm online, or in the wider community.
  - Seek help and support from the Setting, or other appropriate agencies, if they or their child have any safeguarding concerns
  - Contribute to the development of the Setting's safeguarding policies

- A statement on the school websites will inform parents and carers about our duties and responsibilities under child protection and safeguarding procedures.
- Parents can obtain a copy of the Safeguarding and Child Protection Policy and other related policies on request and can view them via the website https://www.stlukesislington.co.uk/ and https://www.moreland-islington.co.uk/

## Mental Health

We have an important role to play in supporting the mental health and wellbeing of children. Staff have an awareness that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected 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, and work with external agencies. We will follow the government guidance promoting and supporting mental health and wellbeing in schools and colleges to help us promote positive mental health and wellbeing for all our children.

Where children have suffered:

- abuse and neglect, or
- other potentially traumatic adverse childhood experiences

this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by following the child protection policy and speaking to the DSL.

# Children in Specific Circumstances

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

- Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Once information about a child with a social worker is communicated to the Setting, the DSL will, as a matter of routine, hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' https://www.gov.uk/government/publications/review-of-children-in-need/review-of-children-in-need contains further information; the conclusion of the review, 'Help, protection, education' https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809236/190614_CHILDREN_IN_NEED_PUBLICATION_FINAL.pdf sets out action the Government is taking to support this.

## Child-on-Child Abuse

- We may be the only stable, secure and safe element in the lives of children at risk of, or who have suffered harm. Nevertheless, whilst here, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other children. We recognise that some children may abuse other children and any incidents of child-on-child abuse will be managed in the same way as any other child protection concern and will follow the local procedures LBI Protocol for Managing Child on Child Sexual Abuse, Violence and Harassment Which Must Be Followed . We will seek advice and support from other agencies as appropriate.

- Child-on-child abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse, sexual violence / sexual harassment, 'upskirting', the sharing of nudes or semi-nudes, 'sexting' or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour and will take swift action to intervene where this occurs. We use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. We understand the different gender issues that can be prevalent when dealing with child-on-child abuse.

- We recognise that LGBTQ+ children can be targeted by others as can children perceived to be LGBTQ+ who can be just as vulnerable. We will ensure that these children have a trusted adult to share concerns with and we will work to consider how we can reduce additional barriers faced by these children and how safe spaces can be provided for them to talk or share concerns. We will use the Statutory Guidance on Relationships, Sex and Health Education for support on addressing homophobic, biphobic and transphobic bullying and abuse.

## Online Safety

Our staff are aware that technology is a significant component in many safeguarding and wellbeing issues:

- Children are at risk of online abuse as well as face to face
- Child-on-child abuse can happen online through:
    - Abusive, harassing and misogynistic messages
    - Non-consensual sharing of indecent nude and semi-nude images/videos especially in chat groups
    - Sharing of abusive images and pornography, to those who do not want to receive it

Staff should:

- Recognise and respond to the indicators
- Recognise it may be taking place, **even if not reported**
- Understand their role in preventing and responding where a child is at risk

- Understand the importance of challenging inappropriate behaviours to ensure a safe environment and not to normalise abuse
- Recognise it can take place inside and outside of Setting both online and offline.

*See Appendix for prevention of and response to child on child abuse and Anti-bullying policy*

## Serious violence

All staff are aware of indicators which may signal that children are at risk from or involved with serious violent crime. These may include:

- increased absence from Setting
- a change in friendships and/or
- relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm and/or
- a significant change in well-being
- signs of assault
- unexplained injuries
- unexplained gifts or news may indicate involvement with individuals associated with criminal networks or gangs.

## Safeguarding Children with Special Educational Needs and Disabilities (SEND)

- We acknowledge that children with special educational needs and disabilities and/or certain health conditions can face additional safeguarding challenges both offline and online, as they may have an impaired capacity to resist or avoid abuse.

- We will use language in relation to medical diagnoses in line with the SEND code of practice 2014. However, we will always respect the wishes and feelings of some children that wish to be known for example, as an 'autistic person' and not a person with a 'disorder' or on the 'spectrum'. This reflects a move towards a more 'person-first' language approach, that emphasises and respects an integral part of a child's identity.
-

- Our staff are aware of the additional barriers which exist recognising abuse and neglect in this group of children, these include:

    - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
    - the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
    - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability rather than abuse or neglect, without further exploration;
    - Speech, language and communication needs which may make it difficult to tell others what is happening and managing or reporting these challenges.

To address these additional challenges, staff will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

## Children Absent and Missing from Education

- We recognise that all children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We are aware that a child who has unexplainable and/or persistent absences or who are missing from education can be potential indicators of abuse, neglect or exploitation.

- We have a procedure in place for responding to unauthorised absence and responding to children who have unexplainable and/or persistent absences from education, particularly on repeat occasions, and for prolonged periods, to help identify the risk of abuse and neglect, including sexual/criminal exploitation, and to help prevent the risks of their going missing in future. This may include liaising with Children's Social Care and/or the police. For further information, please access our policy and procedures regarding attendance and inclusion and Working-together-to-improve-school-attendance We will also follow the statutory guidance Working-together-to-improve-school-attendance 2024, which outlines expectations for schools to work in partnership with local authorities and other partners to promote and support school attendance and places a strong emphasis on early intervention.

- Our staff are aware that children being absent from our setting, particularly unexplained absences and repeat absences for prolonged periods, along with children missing education, can act as a warning sign of a range of safeguarding possibilities including neglect, child sexual and child criminal exploitation, particularly county lines. Our response to persistent absent pupils and children missing education supports identifying such abuse and in the case of absent pupils, helps prevent the risk of them become a child missing education in the future. This includes when problems are first emerging but also where children are already known to Children's Social Care and need a social worker, where being absent from education may increase known safeguarding risks within the family or in the community. We will refer to the government Home Office strategy, Missing Children and Adults in the event that a child and their family do not arrive to school and cannot be contacted. (Cross reference with the setting's Children Missing Education Policy)

## Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Children may be subjected to multiple forms of abuse, including both criminal and sexual exploitation.

Exchange-Based Exploitation: Abuse may occur in exchange for things the child needs or wants (e.g., money, gifts, affection), or for the perpetrator's gain (e.g., financial, status).

**Perpetrators**

- Can be adults or peers, acting alone or in groups.
- Children who harm others may also be victims of exploitation and should be treated as such.

**Vulnerability Factors**

Beyond age, other factors increasing vulnerability include:

- Sexual identity
- Cognitive or learning difficulties
- Communication ability
- Physical strength
- Social status
- Access to resources

**Common Indicators of CCE and CSE and County Lines**

- Unexplained gifts, money, or possessions
- Associations with others involved in exploitation
- Emotional changes
- Substance misuse
- Going missing or returning home late
- Poor school attendance or disengagement from education
- Owing a debt bond to their exploiters

**Support Needs**

Exploited children require additional support to remain engaged in education.

**Specific to Child Sexual Exploitation (CSE)**

- Can be one-off or ongoing, ranging from opportunistic to organised abuse.
- May involve force, enticement, violence, or threats.
- Additional indicators include:
- Relationships with significantly older partners

- Sexually transmitted diseases, advanced sexual behaviour, or pregnancy

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information includes definitions and indicators are included in Annex B of KCSIE 2025.

We will use the Children's Society website to guide and support our staff in helping the prevention of child sexual exploitation as set out in Keeping Children Safe in Education 2025, additional advice and support.

County Lines
Some indicators of county lines are:

- going missing and 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.

Staff are aware of the different forms of extra familial harm including sexual exploitation, criminal exploitation and serious youth violence. Staff are also aware of safeguarding issues that can put children at risk of harm and understand that behaviours linked to issues that put children in danger, such as

- drug taking
- alcohol abuse
- deliberately missing education
- sexting /sharing of nudes and semi nudes

## Child Sexual Exploitation (CSE)

- All staff have been made aware of the revised definition of CSE, as issued by the Department for Education in February 2017 which is

*"Child Sexual Exploitation is a form of child sexual abuse.*
*It occurs when 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 the financial advantage or 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".*

- All staff and volunteers recognise that children at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting children from other risks. They are aware that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexting, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.

- We understand that a significant number of children who are victims of CSE go missing from home, care and education at some point. We are alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.

- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

- Further information about CSE including definitions and indicators is included in Annex B of KCSIE 2025.

Both Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group:
- takes advantage of an imbalance in power (including gender, sexual identity, cognitive ability, physical strength, status and access to economics or other resources) to coerce
- takes advantage to manipulate or deceive a child into sexual or criminal activity
- uses abuse in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator

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

The abuse:
- can involve force and/or
- enticement-based methods of compliance and
- may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B of KCSIE 2025.

## Domestic Abuse

The Domestic Abuse Act 2021 creates a statutory definition of domestic abuse based on the existing cross-government definition.
'Abusive behaviour' is defined in the act as any of the following:
- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.
'Personally connected' is defined in the act as parties who:
- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether or not the agreement has been terminated)

- have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- are or have been in an intimate personal relationship with each other
- have, or there has been a time when they each have had, a parental relationship in relation to the same child
- are relatives

Read the government's statutory definition of domestic abuse factsheet

"Economic abuse" means any behaviour that has a substantial adverse effect on one party's ability to—

- acquire, use or maintain money or other property, or
- obtain goods or services.

**Operation Encompass** provides advice and a helpline service for all staff members who may be concerned about children who have experienced or witnessed domestic abuse. The number is available weekdays from 8 am to 1 pm 0204 5139990.

**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

# Prevent and Radicalisation

- Prevent concerns should be shared with prevent@islington.gov.uk where concerns can be discussed and requests made for a Prevent Referral form.
- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  (1) negate or destroy the fundamental rights and freedoms of others; or
  (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  (3) intentionally create a permissive environment for others to achieve the results in (1) or (2).
- The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition and are an important guide to its application. The further context below is also an essential part of the definition.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 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.
- We recognise that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of children can be compared to grooming for sexual exploitation.
- All staff recognise that children exposed to radicalisation and extremism should be protected and safeguarded in the same way as protecting children from other risks and will report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.
- All staff will complete one of the following approved training packages, every two years, which includes guidance on how to identify people anyone who may be being drawn into terrorism, and how to refer them into the Channel process.

  - **Prevent duty training** offers 3 levels of training. There is also an introduction to radicalisation and how to support children who may be at risk
  - **Workshop to Raise Awareness of Prevent (WRAP)**. This contains videos, the radicalisation process, how to identify at -risk pupils, how to raise concerns and what an appropriate response should be.
    A workshop with video content that explains Prevent, the radicalisation process, how to identify at-risk students, how to raise concerns and what an appropriate response looks like.
  - **Channel General Awareness training** - For anyone who would like to know more about the Channel programme and how to provide a proportionate response in supporting people who have not committed a crime

- **Counter-Extremism: Narratives and Conversations (London Grid for Learning)**
  This is an interactive video explaining the principles applying to all forms of extremism. It helps teachers counter extremist narratives and helps facilitate discussion on respect, tolerance, shared values and community cohesion.

## The Curriculum and Staying Safe

- We recognise our essential role in helping children through PSHE to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

- We will ensure that children are taught about safeguarding, including online safety as we consider that this is part of providing a broad and balanced curriculum. This may include covering relevant issues in the newly published statutory guidance, Relationships Education (for all primary pupils), Relationships and Sex Education (for all secondary pupils) and Health Education July 2025 (for all pupils in state-funded Settings) which has been compulsory since September 2020.
- **Relationships and Sex Education and Health Education:**
  https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
- Education for a Connected World (publishing.service.gov.uk)
- We will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

- Staff are aware that children may not always know that they are being abused or be ready to disclose that they are being abused
- Trusted relationships with staff allow children to communicate what is happening in their lives – we acknowledge they are not always aware how they can disclose abuse
- Many children express the trauma they have experienced or are experiencing through their behaviour
- We are aware that challenging behaviour may well be a sign that they are trying to communicate something and we need to listen to what they are saying even when that might be very difficult
- We use Behaviour in Schools - Advice for Headteachers and School Staff 2022 to ensure that we always consider whether misbehaviour is an indicator of harm or trauma and use the guidance to put in place measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying.
- If pupils' conduct falls below the standard which could be reasonably expected of them, they could be sanctioned. Any decision to suspend or exclude must be lawful, reasonable and fair.
- Our staff are expected to treat everyone with kindness, dignity and respect
- Our staff recognise that it is important to have a good relationship with children, to enable them to share what is happening in their lives so that we can understand what they are experiencing in their daily lives
- We make our children aware that they will be listened to and their concerns taken seriously and acted upon.
- To support this, we include the following:
  - The School Council
  - Student Wellbeing Team
  - Playground Angels
  - Worry boxes
  - PSHE curriculum, assemblies, workshops and events
  - Regular feedback questionnaires with groups of children
  - Emotional Wellbeing curriculum
  - Global Citizenship curriculum
  - Digital Literacy Scheme of work

**Record Keeping**

- Staff will record any welfare concern that they have about a child on CPOMS with a completed body map if injuries have been observed and will pass them without delay to the DSL including verbally informing them. Records will be completed as soon as possible after the disclosure/incident/event, using the child's words where appropriate, and will be signed and dated by the member of staff concerned.

- All safeguarding concerns, discussions and decisions made including the rationale for those decisions, will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with a DSL..

- For visitors and volunteers, safeguarding Incident and Concern forms should be completed and handed to the DSL. These forms are kept in the staff room, school office and DSL office.

- Safeguarding and child protection records are kept for individual children and are maintained separately from all other records relating to the child. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent Setting, under confidential and separate cover in line with KCSIE, 2025. These must be given to the new DSL and a receipt of delivery will be obtained. The DSL should also transfer any information relating to the Channel Programme.

# Confidentiality and Information Sharing

- We recognise that all matters relating to safeguarding and child protection are confidential. The Headteacher or DSL will hold the information and information will only be shared in the interests of keeping the child safe.

- All members of staff are aware that whilst they have duties to keep any information about children, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in Appendix 3.

We have due regard to the relevant data protection principles, which allow us to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' allows the sharing of special category personal data without consent where there is good reason to do so.
- not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we will withhold providing the data in compliance with our obligations under the Data Protection Act 2018 and the GDPR.
- If we are made aware of any safeguarding concerns which need to be shared with the wider community (including other local Settings) then advice will be sought from the POSIE/Children's Social Care to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.
- DfE Guidance on Information Sharing April 2024 is followed with specific emphasis on the Seven Golden Rules of Information Sharing. These can be located outside the school office and safeguarding folder on the policy drive.

- Data Protection Toolkit for Schools: https://www.gov.uk/government/publications/data-protection-toolkit-for-Schools

## Inter-agency Working

- We have an important role to pay in multi-agency safeguarding arrangements and contribute to multi-agency working in line with WTSC December 2023.We are named as a relevant agency by the three safeguarding partners that make up the Islington Safeguarding Children Partnership, and so have a statutory duty to cooperate with published arrangements.

- We are not the investigating agency when there are child protection concerns and we will therefore pass all relevant information to the statutory agencies. We will however contribute to the investigation and assessment processes as required, and recognise that a crucial part of this may be in supporting the child while investigations take place.

- We recognise the importance of inter-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help meetings.

- The Leadership Team including the DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

## Complaints

- We have a Complaints Procedure which is available to parents, pupils/students and members of staff who wish to report concerns. This can be found outside the school office and on the school website.

- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations/Low Level Concerns against Staff policy (Appendix 8) This can be found in the staff room, school office and school websites.

- At our setting, we are committed to maintaining a safe and supportive environment for all students. We understand that concerns may arise, and we encourage parents to utilise our school complaints policy as the first step in addressing any issues. By doing so, we can work collaboratively to resolve matters promptly and effectively, ensuring the best outcomes for our students. Our complaints policy is designed to be transparent and accessible, providing a clear process for raising and addressing concerns. We believe that most issues can be resolved at the school level, and we are dedicated to listening to and addressing the concerns of our school community.
- Should the need arise, parents still have the option to refer matters to external bodies such as Ofsted or the Independent Schools Inspectorate (ISI), but we kindly ask that our internal procedures be followed first to allow us the opportunity to address and resolve the issue.

## Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part one of KCSIE, 2025 which provides an overview of safeguarding duties and responsibilities. All members of staff who work directly with children should at least read Part 1 and Annex B and must sign to confirm that they have read it and understood it. A KCSIE 2025 safeguarding Quiz may be used to test their knowledge following the annual INSET training. A record of the pass mark may be kept on the single central record.

All staff working directly with children:

- Are expected to read at least Part 1 and Annex B of KCSIE
- Should reassure victims of abuse that they are being taken seriously, they will be supported and kept safe
- Should not give children the impression they are creating a problem or made to feel ashamed for making a report

- Should know the indicators of abuse and neglect for specific safeguarding issues eg child criminal exploitation and child sexual exploitation
- Should be aware that multiple safeguarding issues often overlap with one another
- Should be aware of the risk factors that increase the likelihood of involvement in serious violence

- The DSL will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in the Setting's internal safeguarding procedures and communication lines. As a minimum, this will include:
  - The safeguarding and child protection policy
  - the behaviour policy
  - the staff behaviour policy (sometimes called a code of conduct)
  - the safeguarding response to children who go missing from education; and
  - the role of the DSL (including the identity of the DSL and any deputies). (A summary information sheet is available to be given to staff and volunteers to support this process.)

- All staff members (including temporary staff) will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:
  - Recognise potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
  - Respond appropriately to safeguarding issues and take action in line with this policy
  - Record concerns in line with policies
  - Refer concerns to the DSL and be able to seek support externally if required

- All staff members (including temporary staff) will receive appropriate training to ensure they are aware of a range of safeguarding issues including online safety (see definition of safeguarding) and are aware that behaviours linked to drug taking, alcohol abuse, persistent absence from school and child-on-child abuse such as bullying and sexting can put children in danger. The staff training will also include whole school responsibilities, safeguarding and child protection procedures, online safety, safe working practice and external reporting mechanisms.

- All staff members (including temporary staff) will receive regular safeguarding and child protection updates via e-Bulletins, staff meetings or briefings, and annual safeguarding training.), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

- All staff members (including temporary staff) will also be made aware of the Setting's expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP) which is provided and discussed as part of the induction process.

- We recognise the expertise which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. All staff are therefore able to contribute to and shape safeguarding arrangements and the safeguarding policy through involvement of staff groups when reviewing the policy. Other safeguarding policies, for example the Code of Conduct and Acceptable Use Policy, are also sent to staff for their feedback before ratification by the Governing Body.

- The DSL will maintain an up-to-date central register of who has completed safeguarding and child protection training and passed the safeguarding assessment/quiz, including Prevent and will provide an annual update to the Governing Body as part of the annual safeguarding report.

- Although we have a nominated safeguarding lead for the governing body (name of lead governor), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities every three years with annual refreshers.

# Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice / the Setting's Code of Conduct.

- Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, staff will avoid placing themselves in a vulnerable position regarding potential allegations.

- There are circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children and young people, such as guiding a child to safety or breaking up a fight. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. 'Reasonable' means using no more force than is needed. We work in accordance with statutory and local guidance (on the use of reasonable force) and recognises that where intervention is required, it should always be considered in a safeguarding context.

- Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff should be aware of the Behaviour Management and Physical Intervention Policies, and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

- We understand the additional vulnerability of children with special educational needs and disabilities and will ensure positive and proactive behaviour support to reduce the occurrence of risky behaviour and the need to use restraint.

- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in the staff code of conduct the staff acceptable use policy and the Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2022) which can be found outside the school office and in the policy drive.

# Staff Supervision and Support

- The Senior Leadership Team (SLT) aim to create a culture and environment where members of staff feel competent and confident to raise concerns and feel supported in their safeguarding role. Any member of staff affected by issues arising from concerns for children's welfare or safety is encouraged to seek support from the DSL.

- The induction process will include familiarisation with child protection responsibilities and procedures as outlined above. All new staff including newly qualified teachers and support staff will receive induction training and may have a mentor or co-ordinator with whom they can discuss general safeguarding concerns. However, their induction should be clear that safeguarding and child protection concerns should be brought to the DSL's attention, as soon as possible.

- We will provide appropriate supervision/1:1 support for all members of staff to ensure that:
  - staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - all staff have regular reviews of their own practice to ensure they improve over time.
  - case holding staff have a space to discuss and reflect upon their work and progress with particular children.

- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union or other similar organisations directly. Further information about a range of supporting organisations can be found in Appendix 4.

- We will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2025 EYFS statutory framework for group and school-based providers

## Safer Recruitment

As part of our safeguarding culture, we have robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our Setting.

Any members of staff who are involved in the recruitment and selection process are appropriately trained in safer recruitment, covering the topics contained in Part 3 of KCSIE 2025 at a minimum. In accordance with The School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 we will ensure that at least one of the persons who conducts an interview has completed safer recruitment training recommended by the Islington Safeguarding Children Partnership and should be repeated every three years.

We will ensure that the safer recruitment process covers Part 3 KCSIE 2025 in relation to advertisement, application form, shortlisting, employment history and references, selection, ID, DBS checks etc.

- The Governing Body will ensure that the Senior Leadership Team and at least one member of the Governing Body complete accredited Safer Recruitment Training in line with statutory requirements and that this is repeated every three years.

- We are responsible for ensuring that the Setting maintains an accurate Single Central Record (SCR). The SCR is a list of all staff (including supply staff), volunteers and governors and meets statutory requirements.

- We expect all staff and volunteers to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

- As part of the shortlisting process statutory guidance states that we should consider carrying out an online search as part of due diligence to help identify any incidents or issues that have happened that may be publicly available online and to explore this with the applicant at interview. Shortlisted candidates will be notified about this and asked to provide their online identities.

- We will use check-a-teachers-record as part of our pre-employment checks for all those with a teacher reference number including teaching assistants and higher level teaching assistants.

- We will follow statutory guidance in Keeping Children Safe in Education 2025, Annex E, which clarifies and sets out the process for obtaining DBS checks for volunteers and the importance of regular supervision for them.

## Allegations Against Members of Staff and Volunteers

We recognise that it is possible for staff, supply staff and volunteers to pose a risk of harm to children by behaving in a way that might cause them harm. We will take seriously any allegation received and follow the guidance in Part 4, KCSIE 2025.

### Referrals to the Local Authority Designated Officer (LADO)

A referral to the Local Authority Designated Officer (LADO) should be made immediately if a member of staff, volunteer or supply staff has:

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

- behaved or may have behaved in a way that indicates they may not be suitable to work with children (eg where they are involved in an incident outside of Setting which did not involve children but could have an impact on their suitability to work with children (one example being domestic abuse.)
- Behaves in a manner that discriminates against a child on the basis of one or more of their protected characteristics [1].

[1] as defined by the Equalities Act 2010

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

- Basic enquiries to establish facts before contacting LADO
- The headteacher to lead the investigation only after being given the go ahead to do so by the LADO
- The headteacher to discuss any concerns about the welfare of other children in the community or member of staff's family with DSL and make a risk assessment
- DSL may then decide to make a referral to children's social care

Where a member of staff has acted in a way outside of Setting that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate

- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:
  - this should be immediately referred to the headteacher;
  - where there are concerns/allegations about the headteacher, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent Setting; and
  - in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent Setting, this should be reported directly to the LADO.

  - Where there is an allegation against an agency or supply member of staff, the Setting will usually take the lead because agencies do not have direct access to children or other staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the Setting, are under the supervision, direction and control of the governing body or proprietor when working in the Setting. Their agency will be notified about the allegation. They will be advised to contact their trade union representative if they have one, or a colleague for support.

## Low-Level Concerns

- Low-level concerns (including allegations) are those that do not meet the harm threshold set out above. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or as a result of vetting checks undertaken. We will manage and record such concerns and take appropriate action to safeguard children.
- Supply agencies or contractors will be made aware of the process and contacted if necessary
- As part of our whole School approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the setting (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. We believe it is critical to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one KCSIE 2025) are shared responsibly and with the right person, recorded and dealt with appropriately. This is to ensure that problematic or inappropriate behaviour is identified early, the risk of abuse is minimised and that all adults working in the Setting are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Setting.
- A low-level concern means that the behaviour towards a child does not meet the harm threshold and a referral to the LADO. The LADO must however be made aware of any low-level concerns. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Setting may have acted in a way that:
  - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

• being over friendly with children;
• having favourites;
• taking photographs of children on their mobile phone; contrary to school policy
• engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
• humiliating children

We believe it is crucial that any such concerns, including those which do not meet the allegation/harm threshold are shared responsibly and confidentially with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.
Our low-level concerns policy is also set out within the staff code of conduct as per KCSIE 2025.

**What to do if you have a low-level concern**

- Low-level concerns about a member of staff should be reported to the Headteacher/ Low Level Concerns Manager
- We encourage staff to feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the DSL and/or headteacher, and recorded in accordance with our low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

**Recording low-level concerns**

- All low-level concerns should be recorded in writing by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will either implement appropriate sanctions or where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the Setting that have enabled the behaviour to occur and where appropriate policies will be reviewed and updated or extra training delivered to minimise the risk of it happening again. The records will be retained at least until the individual leaves our employment, unless there is an ongoing investigation taking place.

- All staff and volunteers are made aware of our Whistle-blowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff and volunteers can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally on 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk

- We have a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Human Resources Service.

- We expect all our staff to exercise ongoing vigilance and to maintain an environment that deters and prevents abuse and challenges inappropriate behaviour

- For specific guidance on how to respond to allegations against staff, please refer to the Allegations against Staff and Volunteers procedures above and the Whistle Blowing Policy which can be found outside the school office and policy drive. **When in doubt – please ask.**

# The Use of School Premises by Other Organisations

- We will adhere to the guidance Keeping Children Safe in Out of School Settings in what we expect other providers using our premises to have in place. Where services or activities are provided separately by another body using our premises, the Head Teacher and Governing Body will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers, whether or not the children attending the activity are on the school or college roll.
- Other providers must adhere to Keeping Children Safe in Education
- If this assurance is not achieved, then an application to use our premises will be refused.
- If we are made aware of any allegations against staff or volunteers made at the out of school activity we will make a referral to the LADO and follow our own policy.

# Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-school community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well.

- Appropriate checks will be undertaken in respect of visitors and volunteers coming onto the premises as outlined within our Volunteer policy. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

- We will not accept the behaviour of any individual (parent or professional) who threatens school security or causes others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to our site.

# Monitoring and Review

- All staff (including temporary staff and volunteers) will have access to a copy of this policy and will have the opportunity to consider and discuss the contents prior to approval of the Governing Body being formally sought. The policy will also be available to parents/carers.

- This policy has been written in July 2025 to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare which comes into force on 1st September 2025.

- The policy forms part of our development plan and will be reviewed at least annually.

- All staff should have access to this policy and sign to the effect that they have read and understood its contents.

- The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff (even considering learning when they are not substantiated) to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

# Appendix 1: Categories of Abuse

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

## What is 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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both online and offline and be perpetrated by men, women and children. All members of staff should read and understand part one of KCSIE, 2025 and staff who have direct contact with pupils should also read Annex B.

1. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education (see KCSIE 2025 part 5). We will use the resource Supporting practice in tackling child sexual abuse - CSA Centre– it includes a 12 part film to aide understanding and knowledge about child sexual abuse, together with free evidence-based practice resources to identify and respond appropriately to concerns of child sexual abuse

## Signs that may indicate Sexual Abuse

- Sudden changes in behaviour and academic performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

## Signs that may indicate physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks

- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for - inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

## Signs that may indicate emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

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

Signs that may indicate neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Missing from home, nursery/School/college, medical appointments including frequent lateness
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

# Appendix 2: Specific Safeguarding Issues

(Also See Annex B of KCSIE 2025)

## Child-on-Child Abuse (Allegations of abuse made against other children)

- All members of staff recognise that children are capable of abusing other children. Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between 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);
- 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 and could take place inside or outside our setting, offline or online)
- sexual violence and 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 (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; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element

- We believe that abuse is abuse and it will never be tolerated, dismissed or minimised. Any incidents of child-on-child abuse will be managed in the same way as any other child protection concern and will follow the same procedures, as outlined in this policy, and in accordance with the ISCP Protocol for Managing Child-on-Child Sexual Abuse, Violence and Harassment
- Staff should always use a safeguarding first approach and explain to children that the law is in place to protect them rather than criminalise them. This should be done with tact to avoid alarming or distressing them

- We will take steps to minimise the risk of all forms of child-on-child abuse. We will ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and to ensure that children recognise warning signs and have access to support both within the Setting and externally (such as Islington Police, ChildLine etc.). Further information can be found in the Behaviour and Discipline Policy, Sex and Relationships Education Policy, Online Safety Policy and Anti Bullying Policy

- Sharing nudes and semi-nudes or 'Sexting' or 'Youth Produced Sexual Images' will not be tolerated and we will respond to such cases in line with the UKCCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people

- 'Upskirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.

- Further information about our response to specific allegations of abuse against pupils can be located in in the Behaviour and Discipline Policy, Online Safety Policy and Anti Bullying Policy. Further information in relation to the Setting's approach to "sexting" can be found in the Online Safety Policy which is available on the school websites.

- All staff to maintain a culture of 'it could happen here' and that if inappropriate behaviour is addressed early, this can help prevent abusive/violent behaviour

- Victims of abuse will be distressed, which can affect progress and behaviour. If the child who harmed is at the same Setting, this can be made worse and consideration needs to be given to this as per the ISCP Protocol mentioned above.
- Girls are more likely to be victims, boys more likely to harm other children, , but any child can be affected
- It could be a group of perpetrators or an individual
- Part 5 Should be read alongside the ISCP's Protocol for Managing Child-on-Child Sexual Abuse, Violence and Harassment (see link above)
- Staff should keep in mind that some children have additional barriers to disclosing due to vulnerability, disability, gender, ethnicity and/or sexual orientation
- Staff should reflect back, using the child's language, when hearing a report
- Staff should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact upon memory, so children may not be able to recall all details or timeline of abuse

## What to do if you have concerns

- Staff should not wait for a child to make a disclosure, they should act on concerns immediately
- Staff may overhear a conversation that suggests a child may have been harmed or behaviour may be an indicator
- If the report includes an online element, staff may confiscate devices for evidence to hand to the Police - Searching, Screening and Confiscation can be followed
- Staff can ask children outright if they have been harmed and what the nature of the harm was

## Support

- Pupils who have been experienced child-on-child abuse may not feel ready or or know how to tell someone they are being abused and will be supported by:
  - Being offered an immediate opportunity to discuss the experience with a member of staff of their choice
  - Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.

Pupils who are alleged to have abused other pupils will be helped by:

- Discussing what happened, establishing the specific concern and the need for behaviour to change
- Informing parents/carers to help change the attitude and behaviour of the child
- Providing appropriate education and support
- Sanctioning them in line with our behaviour policy. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed-term and permanent exclusions.

Speaking with police or other local services (such as early help or children's specialist services) as appropriate – see When to call the police on when to call the Police.

## Next Steps after Initial Report

- The DSLs risk and needs assessment in response to a report of sexual harassment should also consider whether there have been any other victims. The DSL will regularly review the actions taken to respond to reports and
- Regularly review the risk and needs assessment and put active measures in place to safeguard pupils
- Any risk assessment should be informed by any CSC or multi-agency risk assessment

Staff should be aware of the following:

- Be aware of and respond appropriately to all reports and concerns about sexual violence and/or harassment both online and offline including any happening outside of the Setting
- Balance the victim's wishes against their responsibility to protect other children
- Remember that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Think about other related issues and wider context, including any links to CSE and CCE and take the potential for sexual violence and harassment in intimate personal relationships into consideration
- Keep victim and child who harmed a reasonable distance apart on the premises including at, before and after-school/college activities
- Ensure recording practice is comprehensive and accurate
- The DSL should know what the early help process is and how and where to access support
- The previous restrictions on the use of Police bail have been removed – the Police will now consider what action to take to manage the assessed risk of harm, this could include the use of Police or court bail.

# Harmful Practices

## So called 'Honour based' abuse (HBA)

- Staff and volunteers at are aware that so called 'Honour-based' abuse (HBA) encompasses a range of crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

- The indicators of HBA and associated factors will be covered with staff within the safeguarding training. All members of staff are alert to the possibility of a child being at risk of HBA, or already having suffered HBA. All members of staff are aware that all forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with DSL if they are concerned about HBA.

## Female Genital Mutilation (FGM)

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.
- As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18.
- We will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures. Whilst all staff should speak to the DSL with regard to any concerns about 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 Police 101. See Annex B of KCSIE, 2025 for further detail and Summary of Mandatory FGM reporting duty
- If there are concerns that a girl is going to be cut, the DSL should complete the ISCP FGM Risk Assessment Tool (contact Heather.vaccianna@islington.gov.uk) to identify the relevant indicators and inform further action (we will call Police 999 if a girl is at immediate risk of harm as a result of the risk assessment)
- The DSL will complete the FGM e-Learning package FGM E-Learning Course - National FGM Centre
- The DSL will also ensure that information and training is made available as appropriate to all members of staff. This includes FGM The Facts
- All members of staff will follow this policy and ISCP procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

## Forced Marriage and under age marriage

- A **forced marriage** is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and it is a crime.
- Our staff understand how to report concerns where this may be an issue. We will contact the Forced Marriage Unit for advice or information on 020 7008 0151 or email fmu@fco.gov.uk .
- The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of Schools and colleges. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information
- Since February 2023 any marriage that takes place under the age of eighteen years, whether there is consent or coercion, is illegal.

## Abuse linked to a belief in Spirit Possession Or Witchcraft

Abuse linked to a belief in 'spirit possession' or 'witchcraft' is a global issue that is not confined to particular countries or cultures. These are harmful to children and reported numbers are small although it is believed many go undetected.. The nature of the abuse can be particularly disturbing and the impact on the child serious. There are links between 'spirit possession' and 'witchcraft' and exploitation in that belief in magic or witchcraft may be used to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

The term 'spirit possession' means that a force, spirit, god or demon has entered a child and is controlling him or her resulting in a change in health or behaviour. Sometimes the term 'witch' or 'witchcraft' is used. This is the belief that a child is able to use an evil force or supernatural powers to harm others. Terminology examples are black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah and child sorcerers. Families, carers and the children involved can hold genuine beliefs that evil forces are at work and be deeply worried by the evil that they believe is threatening them. There may also be an element of the adult gaining some gratification through the ritualistic abuse of the child, which may even result in the death of the child.

## Vulnerability

In cases of 'spirit possession' or 'witchcraft' which involve children, the parent/carer views the child as 'different' and attributes this to the child being 'possessed'. This can lead to attempts to exorcise the child.

The reasons for being 'different' can be varied, and include disobedience, independence, bedwetting, nightmares or illness. In some cases there will be no obvious difference and the child will have been targeted because they are perceived to be 'spiritually' different. The attempt to exorcise may involve beating, burning, starvation, cutting/stabbing and/or isolation within the household, all of which obviously constitute abuse.

## Things to Look Out For

Indicators of abuse linked to belief in spirit possession, which may also be common features in other kinds of abuse, include:
· A child reporting that they are, or have been, accused of being 'evil', and/or that they are having the 'devil beaten out of them'.

## Signs of physical abuse;

· A child becoming noticeably confused, withdrawn, disorientated or isolated;
· Personal care deteriorating;
· Attendance becoming irregular or child being taken out of school altogether;
· A deterioration in a child's performance at school;
· Lack of parental concern or attachment.

## What to do if you are concerned

Everyone working with children has a responsibility to recognise and know how to act on evidence, concerns and signs that a child's health, development and safety is being or may be threatened, especially when they suffer or are likely to suffer significant harm.

Standard child safeguarding procedures apply and must always be followed in all cases where abuse or neglect is suspected including those that may be related to particular belief systems

- Contact the DSL immediately or make a referral to Children's Social Care

### Cybercrime

Advice on preparing for online challenges and hoaxes is available here Harmful online challenges and onine hoaxes - GOV.UK (www.gov.uk). All staff are expected to complete an online course on cyber security: https://www.ncsc.gov.uk/information/cyber-security-training-Schools

Cybercrime is criminal activity committed using computers and/or the internet. Cyber Choices aims to intervene where children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'National Cyber Security Centre - NCSC.GOV.UK

### Child abduction and community safety incidents

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

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

Other community safety incidents in the vicinity of a Setting may raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) We will give practical advice on how to keep themselves safe. We will provide outdoor-safety lessons run by teachers or by local Police. The lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available here: Home - Action Against Abduction and Home - Clever Never Goes

### Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery is linked to human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - Modern slavery - GOV.UK (www.gov.uk)

# Appendix 3: Keeping children and yourself safe when responding to disclosures

Staff are encouraged to be professionally curious as it is vital for the early identification of abuse and neglect. They should try to understand the daily life of the child and explore any indicators of abuse and neglect to fully assess any potential risk by having a holistic view and understanding and this means not taking things at face value by exercising respectful uncertainty.

1. **Receive**
   - Keep calm
   - Listen to what is being said without displaying shock or disbelief
   - Take what is being said to you seriously

2. **Respond**
   - Reassure the pupil that they have done the right thing in talking to you

- Be honest and do not make promises you cannot keep e.g. “It will be alright now”
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt if the pupil refers to it e.g. “you’re not to blame”
- Reassure the child that information will only be shared with those who need to know

**3. React**

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- Do not ask leading questions; “Did he/she….?” Such questions can invalidate evidence.
- Do ask open “TED” questions; Tell, explain, describe
- Do not criticise child who harmed-the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

**4. Record**

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

**5. Remember**

- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

**6. Relax**

- Get some support for yourself, dealing with disclosures can be traumatic for professionals

# Appendix 4: Sexual violence and sexual harassment between children

**Child-on-Child Abuse – Model Policy.**

*Additional areas for consideration can be found Part 5 of KCSIE 2025 and the ISCP* Protocol for Managing Child-on-Child Sexual Abuse, Violence and Harassment

## Context

a. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

b. 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 as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

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

## Policy

a. We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the Setting and other children.

b. We recognise that children can abuse their peers and this will be dealt with under our child protection policy and in line with KCSIE 2025.

c. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

d. We will minimise the risk of child-on-child abuse by: -

## Prevention

- Taking a whole Setting approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by our behaviour policy and pastoral support system, and by a planned programme of evidence based content delivered through the curriculum.
- Engaging with specialist support and interventions.

- Using a clear reporting system for staff and pupils, that is well promoted, easily understood and accessible
- Recognising that it may be taking place, even if not reported
- Publicising the Setting's zero-tolerance approach to abuse
- Online safety education and policy, including the policy of no mobile phone usage at school

## Responding to reports of sexual violence and sexual harassment:

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the guidance Searching, Screening and Confiscation (publishing.service.gov.uk)
- Staff taking a report will inform the DSL as soon as possible
- Staff taking a report will never promise confidentiality.

- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care.
- We use the Lucy Faithfull Foundation harmful sexual behaviour toolkit, which provides support, advice and information on how to prevent this harmful sexual behaviour and provides resources to support our staff to respond to reports of sexual violence and harassment and use.
- We will also signpost children to the Lucy Faithfull 'shore space' website, which offers a confidential chat service supporting children worried about their own or some else's sexual thoughts and behaviours.

## Risk Assessment: -

- Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider;
  - The victim, especially their protection and support.
  - The alleged child who harmed, their support needs and any appropriate sanctions.
  - All other children at the Setting.
  - The victim and the child who harmed sharing classes and space at school.
  - The risk assessment will be recorded and kept under review.
  - Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the Setting's approach to supporting and protecting pupils.

## DSL considerations and response

- The DSL will consider: -
  - The wishes of the victim.
  - The nature of the incident including whether a crime has been committed and the harm caused.
  - The ages of the children involved.
  - The developmental stages of the children.
  - Whether there is a power imbalance between the children/young people.
  - Any previous incidents.
  - Ongoing risks.
  - Other related issues or wider context.

## Options

The DSL will then consider the following options: -

- Manage internally
- Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

## Ongoing Response:

- The DSL will manage each report on a case-by-case basis and will keep the risk assessment under review.

- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the child who harmed should be removed from any classes they share with the victim.

- The DSL will consider how best to keep the victim and other child a reasonable distance apart on the premises and on transport where appropriate.

- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the other child to remain in the same Setting would seriously harm the education or welfare of the victim (and potentially other pupils or students).

- Where a criminal investigation into sexual assault leads to a conviction or caution, the Setting will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

- Where the child who harmed is going to remain at the Setting, the principle would be to continue keeping the victim and the child who harmed in separate classes and continue to consider the most appropriate way to manage potential contact on the premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged child who harmed and other witnesses (children& adults) will receive appropriate support and safeguards on a case-by-case basis.

- We will impose any appropriate sanctions against the alleged child who harmed in line with our behaviour policy.

- We recognise that implementing sanctions and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

## Physical Abuse

- While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

- These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

- The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

# Appendix 5: National Support Organisations

## Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

## Support for Pupils

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Home - Kooth
- Shore Space: www.shorespace.org.uk

## Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

## Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

## Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk

### Honour based Abuse

- Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage
- FGM: Summary of Mandatory FGM reporting duty
- Islington FGM Risk Assessment
- Karma Nirvana

### Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

### Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

### Radicalisation and Extremisim

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk
- New definition of extremism (2024) - GOV.UK (www.gov.uk)
- Prevent referrals to prevent@islington.gov.uk

## Appendix 6: Local Support

**Islington Children's Services Contact Team**
Telephone: 020 7527 7400
CSCTreferrals@islington.gov.uk

**Islington LADO**
Telephone: 0207 527 8101/02
Email: lado@islington.gov.uk

LADO Referral Form

**Islington Police**
101 (or 999 if there is an immediate risk of harm)

**NPCC- When to call the police**
When to call the Police- should help DSLs understand when they should consider calling the police and what to expect when they do

**Islington Safeguarding Children Partnership (ISCP)**
iscp@Islington.gov.uk

**Islington Family Information Service**
Telephone: 0207 527 5959
http://www.islington.gov.uk/fis

**Islington Family Directory**
http://directory.islington.gov.uk/kb5/islington/directory/service.page

**Principal Officer Safeguarding in Education (POSIE)**
Anastasia.georgiou@islington.gov.uk
Pupil Services PupilServices@islington.gov.uk
Telephone 020 7527 5845
Alternative number Pupil Services: 020 7527 3747

**Domestic Abuse, Violence against Women and Girls, FGM, Forced Marriage**
Heather Vaccianna Anti-Bullying Coordinator heather.vaccianna@islington.gov.uk 0207527 7793, 07584 370797

The Sunflower Project offers direct support to children and schools to identify and implement gender equality initiatives – contact Tanya.Pinnock@islington.gov.uk 07815 990 366

**Prevent**
Prevent Education Lead: Bev Thomas Beverley.Thomas@islington.gov.uk;
Tel : 020 7527 3018
prevent@islington.gov.uk

## National Support Organisations

| | |
|---|---|
| Galop's National LGBT+ Domestic Abuse Helpline - support and advice for lesbian, gay, bisexual, trans+ people who have experienced abuse - | 0800 999 5428<br>help@galop.org.uk |
| Hourglass - support and information for older people and those concerned about an older person experiencing abuse or exploitation | 0808 808 8141<br>Live chat |
| IKWRO Women's Rights Organisation - support for Middle Eastern, North African and Afghan survivors | 020 7920 6460<br>Out-of-hours emergencies<br>Kurdish/Arabic/English: 07846 275246<br>Farsi/Dari/English: 07846 310157 |
| IKWRO Women's Rights Organisation - support for Middle Eastern, North African and Afghan survivors | 020 7920 6460<br>Out-of-hours emergencies |

| | |
|---|---|
| | Kurdish/Arabic/English: 07846 275246<br>Farsi/Dari/English: 07846 310157 |
| Jewish Women's Aid | 0808 801 0500 |
| Latin American Women's Rights Service - support for Latin American women | 0808 145 4909<br>Monday to Friday 11am to 1pm<br>info@lawrs.org.uk |
| Muslim Women's Network | 0800 999 5786<br>0303 999 5786<br>info@mwnhelpline.co.uk |
| SignHealth - support for deaf people and those with hearing loss in British Sign Language (BSL) | 020 3947 2601<br>Text: 07970 350366<br>da@signhealth.org.uk |
| Stay Safe East - support for disabled survivors of domestic abuse | 020 8519 7241<br>Text: 07587 134 122<br>enquiries@staysafe-east.org.uk |
| Southall Black Sisters - support for gender-related abuse against Asian and African-Caribbean survivors | 020 8571 9595<br>Web form |
| Victim Support community-based domestic abuse services | Web form<br>Live chat<br>My Support Space |
| Forced Marriage and Honour Based Abuse<br>https://karmanirvana.org.uk/<br>Forced Marriage Unit 020 7008 0151 or email fmu@fcdo.gov.uk. | UK Helpline: 0800 5999 247 |
| https://www.solacewomensaid.org/ | **0808 802 5565** |

# Appendix 7: Safeguarding in Education links

**Preventing neglect, abuse and exploitation**

- Working together to safeguard children 2023
- The right to choose: multi-agency statutory guidance
- Child abuse concerns: guide for practitioners
- Child sexual exploitation: definition and guide for practitioners
- Child abuse linked to faith or belief: national action plan
- Working-together-to-improve-school-attendance

**Keeping children safe in education and other settings**

- Keeping children safe in education 2025

- EYFS statutory framework for group and school-based providers (2025)
- Supervision of activity with children
- Protecting children from radicalisation: the prevent duty
- Secure children's homes: how to place a child aged under 13
- Children missing education
- Drugs: advice for Schools
- Behaviour in Schools - Advice for Headteachers and School Staff 2022

**Online safety**

- Teaching online safety in Schools
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Harmful online challenges and online hoaxes
- Education for a Connected World
- Safeguarding children and protecting professionals in early years settings: online safety considerations
- Searching, Screening and Confiscation
- School suspensions and permanent exclusions - GOV.UK
- Arranging Alternative Provision - guide for LAs and schools

**Safeguarding children with Special Education Needs and Disabilities**

- Safeguarding disabled children
- SEND Code of Practice 0-25 years
- Supporting Pupils at School with Medical Conditions
- Islington SEND Information and Support Service
- MENCAP
- Find Your Islington | Islington SENDiass
- Safeguarding d/Deaf and disabled children and young people | NSPCC Learning

**Runaway and homeless children**

- Children who run away or go missing from home or care
- Provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation

**Cross-border child protection**

- Cross-border child protection cases: the 1996 Hague Convention
- Safeguarding children who may have been trafficked
- Care of unaccompanied migrant children and child victims of modern slavery
- Find help to get your child back from abroad or arrange contact

## Appendix 7: Anti Bullying Policy

# The Federation of Moreland and St Luke's Anti-Bullying Policy

**Rationale, Principles and Values:**

This policy has been written in consultation with children, staff, parents and governors. We at St Luke's and Moreland Primary Schools are committed to providing a caring, friendly and safe environment for all of our pupils so they can learn in a relaxed and secure atmosphere. Our ethos is based on the values of love and respect. We recognize that each person is unique and equal. Bullying of any kind is unacceptable at our school. If bullying does occur, all pupils should be able to tell and know that incidents will be dealt with promptly and effectively. We are a *TELLING* school. This means that *anyone* who knows that bullying is happening is encouraged to tell the staff.

**School's Responsibilities:**

- The Head teacher of each school has overall responsibility for this anti-bullying policy.
- The governor for Inclusion, and therefore Anti-bullying, is Jo Honigmann.
- The school will meet the legal requirements for all schools to have an anti-bullying policy in place.
- The school will work closely with other professional agencies to ensure that children stay safe.
- All governors, teaching and non- teaching staff, pupils and parents/guardians will have an understanding of what bullying is.
- All governors, teaching and non -teaching staff, pupils and parents/guardians will know what the school policy is on bullying.
- Pupils and parents/carers will be assured that they will be supported when bullying is reported.
- Whole school initiatives (such as RULER, ITIPS, Equaliteach, specialist workshops, anti-bullying week, children's mental health week) and a proactive anti bullying curriculum (including PSHE , RSE , Global citizenship and Emotional Literacy) will be used throughout the school.
- A positive, caring ethos will be created within the school environment where everyone can work and express themselves free from fear of being bullied.

**Objectives:**

- All governors, teaching and non-teaching staff, pupils and parents should have an understanding of what bullying is.
- All governors and teaching and non-teaching staff should know what the school policy is on bullying, and follow it when bullying is reported.
- All pupils and parents should know what the school policy is on bullying, and what they should do if bullying arises.
- As a school we take bullying seriously. Pupils and parents should be assured that they will be supported when bullying is reported.
- Bullying will not be tolerated.

**Definitions of Bullying**

Bullying is defined as 'The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online'.

Bullying can include:

| TYPE OF BULLYING | DEFINITION |
|---|---|
| Emotional | Being unfriendly, excluding, tormenting |
| Physical | Hitting, kicking, pushing, taking another's belongings, any use of violence |
| Prejudice-based and discriminatory, including:<br>Racial<br>Faith-based<br>Gendered (sexist)<br>Homophobic/biphobic<br>Transphobic<br>Disability-based | Taunts, gestures, graffiti or physical abuse focused on a particular characteristic (e.g. gender, race, sexuality) |
| Sexual | Explicit sexual remarks, display of sexual material, sexual gestures, unwanted physical attention, comments about sexual reputation or performance, or inappropriate touching |
| Direct or indirect verbal | Name-calling, sarcasm, spreading rumours, teasing |
| Cyber-bullying | Bullying that takes place online, such as through social networking sites, messaging apps, gaming sites, devices or via images, audio, video, or written content generated by artificial intelligence (AI) |

It should be noted that single incidents of hurtful or thoughtless behaviour should also be taken seriously and dealt with according to policy guidelines. Bullying is deliberately hurtful behaviour that is repeated over a period of time where there is an imbalance of power. This can take the form of name-calling, violence, threatened violence, isolation, ridicule or indirect action such as spreading unpleasant stories about someone.

The school works hard to ensure that all pupils know the difference between bullying and simply "falling out".

We recognise that bullying can occur in younger children also and that staff need to be aware of how bullying presents in young children and how to manage this. EYFS staff receive specific training and the Early Years Behaviour Policy contains information bullying in younger children.

**Signs of Bullying**

The following are not caused only by bullying, but provide a useful initial checklist for adults (staff and parents/carers) to consider when identifying that bullying may be occurring.
Children may:

- be frightened of walking to and from school
- be unwilling to go to school
- beg an adult to take them to school
- change their route to school
- begin doing poorly in their school work
- come home regularly with clothes or books destroyed
- become withdrawn start stammering
- become distressed stop eating
- attempt suicide
- cry themselves to sleep
- have nightmares and call out to be left alone
- have unexplained cuts, scratches and bruises
- have their possessions go missing
- ask for or begin stealing money to pay the bully
- continually 'lose' their pocket money
- refuse to say what's wrong
- hide their phone or device or be secretive about what is on it
- give improbable excuses to explain any of the above.

**School Procedures**

1. Pupils must report any incident of bullying to a member of staff, usually the Class Teacher.
2. All reported incidents of bullying will be investigated and taken seriously by staff members. A record will be kept of incidents and monitored by staff.
3. Prejudice related incidents will be recorded on CPOMS in the appropriate category and reported to governors.
4. Each pupil involved in an incident must be given an opportunity to talk and the discussion should remain focused on finding a solution to the problem and stopping the bullying recurring. A RULER Blueprint should be used to support these conversations.
5. The Class Teacher will also address issues through P.S.H.E lessons and/or Circle Time if an incident is not resolved.
6. The Head Teacher must be informed of all reported incidents of bullying.
7. The parents of bullies and their victims will be informed of an incident and the action that has taken place and asked to support strategies proposed to tackle the problem.
8. The bully will also be reminded of the possible consequences of bullying and the sanctions for repeated incidents will be clearly explained to them.
9. Persistent bullies may be suspended or permanently excluded from school if no improvement in behaviour is seen.
10. Children will be encouraged to develop a strong sense of their own worth as human beings which will not be damaged by the efforts of potential bullies to insult or control them.

**Advice to Children**

We use the Anti Bullying Alliance recommendations.

If you are bullied:

1. Tell someone you trust
2. Keep a record of what's happening
3. Don't retaliate
4. Surround yourself with people that make you feel good
5. Don't blame yourself – it is NOT your fault
6. Be proud of who you are

- It doesn't matter what colour hair you have; what trainers you are wearing; how you speak; how you walk; how you talk – it is not your fault if you get bullied. We are all different in some way and that's what makes us amazing.
- Whether you are a boy or a girl, old or young, big or small – bullying makes you feel rubbish and it's okay to be upset about it. The important thing is that you tell someone about it.
- If you feel you can, talk to a teacher you trust or a family member. If you don't want to do that you can always call Childline 0800 11 11 or visit www.childline.org.uk.
- Write down what happened, when it happened, and who was involved. If the bullying is online, keep the evidence – save or copy any photos, videos, texts, e-mails or posts.
- It can be tempting if you are being bullied to take revenge – for example to send a horrible message back to someone; to try and embarrass and hurt the other person, or to fight back. This is not a good idea – you might end up getting in trouble or get yourself even more hurt.
- Think about other ways you can respond to bullying. For example, practice saying 'I don't like it when you say that/do that – Stop.' Think about other people who can help you if you are being bullied – this could be other classmates, or a teacher.
- Only spend time with people who make you feel good about yourself. If someone constantly puts you down they are not a real friend/ boyfriend/ girlfriend and not worth your time.
- Be kind to yourself, and do things that make you feel good, relax and make new friends. You might make music; write lyrics; draw cartoons; dance; act or join a sports club. This is your life so make sure it's the best life possible – don't let anyone bring you down.
- Remember to respect other people! Just because someone is different to you and your friends – that doesn't mean you are better than them or have a right to make them feel bad. If you mess up, say sorry. You don't have to be friends with everyone – but you should always make it clear that you don't like it when people bully others, and stick up for people who are having a hard time.

You can stop bullying:

- do not stand by and watch- get help
- show that you and your friends disapprove
- give sympathy and support to children who may be bullied
- be careful not to make personal remarks or tease-imagine how you would feel
- if you know of serious bullying, tell a trusted adult. It is not telling tales, the victim may be too scared to tell.

**Community cohesion and inclusion**

The policies, system and practices at St Luke's and Moreland Primary Schools set out to promote community cohesion and inclusion. We provide a high quality educational experience for all children, regardless of any protected characteristics they may have. It is clear from the statements around the

school, that discriminatory or offensive comments or actions relating to any of the protected characteristics are not tolerated at St Luke's and Moreland.

Staff aim to maximise the potential of all our pupils through:

- Setting suitable learning challenges.
- Responding to children's diverse needs.
- Overcoming potential barriers to learning.

**Monitoring and evaluation of the policy:**

To ensure the policy is effective, it will be regularly monitored and evaluated. The Curriculum Committee of the governing body monitors the impact of all policies. This committee report its findings to the full governing body and it will be amended as necessary. We aim to monitor the policy through analysis of behaviour incidents and bullying incidents recorded on CPOMS, the annual children's questionnaire and work done during Anti-Bullying week.

**Conclusion**

At St Luke's and Moreland Primary Schools we take seriously our responsibilities to address any incidents of bullying and prejudice related incidents and prevent their recurrence. In this we need the co-operation and support of parents and a shared understanding of the issues involved. This policy is intended to assist that understanding. A child friendly version of this policy is also available.

**More Information**

More information and help is available from the following :

**Helplines**

- ChildLine: ChildLine is the UK's free, confidential helpline for children and young people. They offer advice and support, by phone and online, 24 hours a day. Whenever and wherever you need them, they'll be there. Call 0800 1111. They have a designated page for bullying issues that includes a new video about building up your confidence after bullying.
- Direct Gov: Information for young people on cyberbullying, bullying on social networks, Internet and email bullying, bullying on mobile phones, bullying at school, what to do about bullying, and information and advice for people who are bullying others and want to stop.
- EACH : EACH has a freephone Helpline for children experiencing homophobic, biphobic or transphobic bullying or harassment: 0808 1000 143. It's open Monday to Friday 10am-5pm.
- Victim Support: They offer support to young people affected by crime. Their Children and Young People's (CYP) Service also deals with cases of bullying; offering advice and working with professionals to ensure young people get the support they need. You can call their Support line for free on 08 08 16 89 111.

**Websites**

The websites below have lots of information and advice for anyone who has experienced bullying.

- The Child Exploitation and Online Protection Centre (CEOP) maintains a website for children and young people, and parents and carers about staying safe online: Think U Know
- Childline: information about bullying
- Kidscape: information for young people
- Family Lives: www.familylives.org.uk

**Reporting cyberbullying**

- If someone makes you feel uncomfortable or upset online, talk to an adult you can trust, such as a relative or a teacher. If you would prefer to talk to someone in confidence you can contact Childline (0800 1111)
- If someone has acted inappropriately online towards you, or someone you know, you can report directly to the Child Exploitation and Online Protection Centre (CEOP). It could be sexual or threatening chat, or being asked to do something that makes you feel uncomfortable or someone asking to meet up.

**Appendix 8: Allegations of abuse made against staff and volunteers (including low level concerns)**

# The Federation of Moreland and St Luke's Allegations against staff (including low-level concerns) policy

**Section 1: Allegations that may meet the harms threshold**

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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 out local authority designated officer (LADO).

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

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

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

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

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

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be

grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

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

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

**Definitions for outcomes of allegation investigations**

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

**Procedure for dealing with allegations**

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Support is also available from the Employee Assistance Programme provided by the Local Authority and from trade union representatives.

- 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

- As an Early Years Provider 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.

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

**References**

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

**Learning lessons**

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

This will include consideration of (as applicable):

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

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

**Non-recent allegations**

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

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

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

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

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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

See Appendix A for information on the Spectrum of Concerns.

**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

Any low level concerns should be reported as soon as possible to the Headteacher or Low Level Concerns Manager (Francesca Bear, Ben Williams/DSL St Luke's Dominic Ebassi /DSL Moreland). This report can be verbal or a written account can be completed on the reporting low level concerns form. The DSL should make a written record of the concern and inform the headteacher of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern.

**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/ Low Level Concerns Manager (DSL) 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 will collaborate with the DSL.

The Headteacher will consider the low level concern raised and take appropriate action including meeting with the member of staff who the low level concern has identified. This could also include:

- Monitoring the situation
- Meeting with those involved including parents/carers if appropriate
- Clarifying policies and procedures with the staff member concerned
- Consulting with the LADO for advice
- Consulting with HR for advice
- Issuing a verbal or written warning
- Following appropriate disciplinary procedures
- Providing relevant training/ mentoring / support to the member of staff
- Reviewing school policies and procedures
- Taking no further action ( the low level concern will still be recorded)

<u>Developing and implementing a low-level concerns policy: A guide for organisations which work with children</u>

**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 A**

**Spectrum of Behaviour**

**Concern or allegation that may meet harm threshold**

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates 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.

**Low-level concern**

Does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

**Appropriate conduct**

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

**Appendix B:  Reporting Low Level Concerns Form**

## Low Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with the Federation of Moreland and St Luke's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

You should provide a concise record (online/electronically or hard copy) – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

**Details of Concern**

| Name of Staff Member: | Role: |
|---|---|
| | |
| Signed: | Time and Date: |

| Received by: | At (time): | On (date): |
|---|---|---|
| Action taken: (specify) | | |
| Signed: | Time and Date: | |

This record will be held securely in accordance with The Federation of Moreland and St Luke's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but The Federation of Moreland and St Luke's may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.