

Yardley Primary School

Child Protection and Safeguarding Policy (including Safer Recruitment, Allegations Against Staff and Low-Level Concerns)

2024-2025

Review date

13/9/18, 20/11/18, 26/11/19, COVID addendum
 March 2020 (separate document), 15/8/20, 20/9/20,
 3/7/21, 14/8/21, 10/11/22, 16/9/23, 22/11/24

Key changes to policy 2024-2025

- Updated name of Safeguarding Governor
- Added the Maintained Schools Governance Guide and Academy Trust Governance Guide to legislation.
- Updated all links to KCSIE 2024
- Added 3 additional bullet points to Children & Young People Who Are Especially Vulnerable to reflect changes in KCSIE 2024
- Updated opening paragraph of 'Children with Special Educational Needs' to reflect changes in KCSIE 2024
- Added 'cognitive understanding' to a list of additional safeguarding challenges faced by pupils with SEND.
- Added that all staff should be able to identify 'signs of possible abuse, exploitation or neglect' (previously read 'signs of possible abuse or neglect') and replaced 'being drawn into terrorism' with 'becoming involved with or supporting terrorism' in the Staff and responsibilities section. to reflect changes in KCSIE 2024
- Added 'There is the recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being recorded'. In child-on child abuse section.
- Online safety section and child-on-child abuse section updated definition of sharing nude and semi-nudes to include computer-generated imagery.
- Record keeping and information sharing section added that records should include 'instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc'. To reflect changes to KCSIE (Annex C)
- Added a section titled 'Assessing adult-involved nude and semi-nude sharing incidents'.
- CCE and CSE section added 'control' and replaced 'increased status' with 'other advantage'. to reflect changes in KCSIE 2024
- Domestic abuse section added "This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects' to reflect changes in KCSIE 2024
- Added section titles 'Preventing Radicalisation'.

Key Information

Setting Main Phone Number	020 85293671
Setting Main Email	office@yardleyprimary.co.uk
Setting Address	Yardley Primary School Hawkwood Crescent E4 7PH
Designated Safeguarding Lead	Mrs Odysseas
Deputy Designated Safeguarding Lead	Mr Reddick, Mrs Burke,
Wrap Around Care Deputy Safeguarding Lead	Mrs Vundum
Safeguarding Email Address	safeguarding@yardleyprimary.co.uk
Named Person for Allegations against staff & volunteers (ASV)	Mr C Evans, Mrs S Ayub
SENCo / Special Needs Lead	Mrs S Odysseas
LAC / PLAC Lead	Mrs S Odysseas
e-Safety Coordinator	Mrs S Odysseas and Miss Emerson
Headteacher / Principal	Mr C Evans
Chair of Governors / Trustees Managing Allegations against Headteacher	Mrs S Ayub
Safeguarding Link Governor	Mrs K. Ehilebo
Training	S Emerson, Safer Recruitment 27/4/22 C Evans Safer Recruitment 25/5/22 D Burke, S Odysseas, DSL refresher 15/2/23 G Reddick, Child on Child Abuse 20/2/23 J Vundum, DSL refresher & Child on Child Abuse 15/3/23 S Odysseas Safer Recruitment Training 26/6/23 S Odysseas, D Burke Aim Training 28/9/23 All Staff Prevent Training 8/1/24 S Odysseas, Annual Certificate in Understanding Prevent 15/1/24 All Staff safeguarding 2/9/24 D Burke, Operation Encompass 14/11/24 A Baldock, Safeguarding for Governance 23/3/25

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Safeguarding Legislation and Guidance

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners. (Local Authority, the police, Integrated Care board). This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#). The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children. It also takes into account the [London Child Protection Procedures \(7th Edition\)](#)

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

We comply with this guidance and the procedures set out by our [local safeguarding children board](#).

This policy is also in line with the following legislation;

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty 2023](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

All staff must read [Part One of Keeping Children Safe in Education 2024 and Annex B](#). Staff have been sent a copy of this Keeping document. In addition, all staff who work directly with children should read Part Five. Staff who do not work directly with children will read either Part one or Annex A (a condensed version of Part one). All staff are required to provide signed confirmation that they have read Part One of Keeping Children Safe in Education 2024 and [Part Five and Annex B or Annex A](#) (where appropriate).

Our Commitment to Safeguarding

We believe that all children have a right to be safe and should be protected from all forms of abuse and neglect.

Although reporting concerns can be uncomfortable for staff, and be unpleasant for families, as a school, we recognise that it is better to help children, young people and their families early, before issues escalate and become more damaging.

Because safeguarding is everyone's responsibility, all staff are committed to recognising and reporting all concerns relating to child safety, wellbeing and are vigilant to spot signs of abuse and maltreatment.

As such, we promise to:

Be observant and alert to signs of abuse

- Be curious and question explanations given by parents / children / staff
- Be compassionate, honest and clear
- Ask for support when we feel at the limit of our experience / patience / skills
- Understand and follow school policies and procedures
- Work together with other agencies when appropriate to make sure that support for children, young people and families is effective and helps improve outcomes.

Children and young people learn and thrive best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them.

Yardley aims to offer an environment where children feel welcome, safe, stimulated and where children are free to enjoy learning and develop in confidence.

The purpose of this policy is to safeguard and promote the welfare of children at Yardley.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- **Protecting children from maltreatment**
- **Preventing impairment of children's mental and physical health or development**
- **Ensuring that children grow up in circumstances consistent with the provision of safe and effective care**
- **Taking action to enable all children to have the best outcomes.**

We recognise that:

- Some children may be especially vulnerable to abuse
- 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. Whilst at school, their behaviour may be challenging
- Children can be victims and perpetrators of abuse
- Children who harm others may have been abused themselves
- Allegations can be made against staff, however careful and safe our recruitment practices

In order to take all necessary steps to keep children safe and well, Yardley will:

- Safeguard children both preventatively and responsively
- Ensure the suitability of adults who have contact with children
- Promote good health, effective management of medical conditions, and the development of self-care in children & young people
- Have clear standards of behaviour for staff / volunteers and children / young people
- Manage behaviour by anticipating possible concerns, prevention strategies, and clear, fair responses to challenging behaviour
- Maintain records that document safeguarding concerns over time, including low-level worries about a child or young people that together may paint a picture of concern

- Ensure that all policies and procedures relating to safeguarding and wellbeing are updated annually in collaboration with the board of governors (or similar).

Especially Vulnerable Pupils/Equality Statement

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

Children & Young People Who Are Especially Vulnerable

- 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 education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Some children may have an increased risk of abuse both online and offline. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

Children with Special Educational Needs and Disabilities

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group of children. This can include;

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

Mental Health

Staff should be aware:

- That mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That experiences of abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact
- How these experiences can affect children's mental health, behaviour and education

Staff should know that only trained professionals should attempt to make a diagnosis of a mental health problem, but that all staff should:

- 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
- Report a mental health concern about a child (that's also a safeguarding concern) by following the school's child protection policy and speaking to the DSL or deputy

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. 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.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes, which should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions in relation to safeguarding and promoting welfare (i.e., responding to unauthorised absences or missing education episodes and the provision for pastoral and/or academic support).

Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Waltham Forest's safeguarding children board. Our policy and procedures also apply to extended school and off-site activities.

This policy is readily available via our [website](#) for professionals, parents and partners.

All Staff

All staff will

- be able to identify signs of possible abuse, exploitation or neglect.
- will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.
- read and understand part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(2024\)](#), and review this guidance at least annually.
- and volunteers will sign a declaration at the beginning of each academic year to say they have reviewed the guidance.
- reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of

what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

- provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct and the role of the designated safeguarding lead (DSL) and deputies
- The behavior policy, the online safety policy and the safeguarding response to children who go missing in education
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including those linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- The [Waltham Forest Safeguarding Children Board \(WFSCB\)](#) works to ensure that all local children's agencies within Waltham Forest work together for the safety and well-being of children and young people. It is a statutory mechanism responsible for ensuring and monitoring the effectiveness of local agencies who provide services for children up to the age of eighteen, including educational settings. They work together to

promote the safety and well-being of children and young people within the borough.

The Designated Safeguarding Lead (DSL)

A Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team, appointed to support the management of safeguarding cases within school. The DDSLs (deputies) are trained to the same level as the DSL, and can take over seamlessly in the event of the DSL being absent.

The DSL role includes, but is not limited by, the following:

Provides Advice & Support

- Acts as a source of advice, support, expertise and liaison to the school community.
- Is available; A DSL or Deputy will be on site at all times to provide cover during school hours and available to support staff with concerns.
- safeguarding@yardleyprimary.co.uk email is available to provide staff with advice, information and signposting out of hours and over weekends / school holidays in the event of an emergency. If, for some reason, the DSL is inaccessible, staff and volunteers must make a referral without delay. [WF MASH referrals](#)

Provides Expertise

- Understands the local multi-agency safeguarding arrangements and procedures, including Early Help.
- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in Parts 1 & 5, and Annex A of [Keeping Children Safe in Education](#) 2024, ensuring that all staff receive necessary training, information and guidance
- Has a good understanding of harmful sexual behavior
- Has a good understanding of the filtering and monitoring systems and processes in place at our school

Maintains & Manages Records

- Keeps detailed records in confidential files, via an online safeguarding recording system, that are separate from the main pupil file and stored securely.
- Ensures that, when a pupil under the age of 18 years leaves Yardley, all child protection records are passed to the new setting (separately from the main pupil file and ensuring secure transit) and confirmation

of receipt is obtained. If the child is the subject of an open case to Children's Social Care, the pupil's social worker is also informed.

- Keep the headteacher informed of any issues

Champions Children's Wellbeing

- Encourages a culture of listening to and taking account of children's wishes and feelings.
- Is alert to the specific needs of children with special educational needs, children in need, children subject to child protection or care proceedings, children in care, young carers, children with particular vulnerabilities (see below) in order to provide effective pastoral support and liaison with other agencies.
- Ensures that children and young people are supported to be able to identify risk in their lives or those of their peers in an age-appropriate way, and that they know how they can report it.
- Oversees pastoral care in Yardley.
- Ensuring the appointment of a Designated Teacher for children who are looked after by the local authority and those who have left care through adoption, special guardianship or child arrangement orders, or who were adopted from state care outside of England. At Yardley Primary School the Designated Teacher for children who are looked after is the DSL – Mrs Odysseas.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

Refers to external agencies and is the primary point of contact for safeguarding

- Attends and/or contributes to child protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings.
- Coordinates Yardley's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- Develops effective links with relevant statutory and voluntary agencies, including the local safeguarding partnership.
- Refers cases of suspected abuse to children's social care and police as appropriate.
- Works in partnership with social workers and with safeguarding partnership to support the child.

- Notifies social care if a child-on-child protection is absent for more than two days.
- Works alongside SENDCo, Pastoral team and Designated teacher for looked after children and the Designated teacher for previously looked after children. At Yardley Primary, Mrs Odysseas covers all of these roles.
- Liaises with the link governor for safeguarding and headteacher as appropriate

Supports and Liaises with Parents, Carers & Families

- Ensures parents are aware of the school's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Ensures that the safeguarding policies are made publicly available (e.g., on the website) and are easily accessible to all (staff, parents, children, those for whom English is not a first language).

Sets and Communicates Policy

- Updates safeguarding policies (safeguarding, child protection, online safety, safer recruitment, code of conduct, etc) annually in line with the Local Safeguarding Partnership and statutory requirements
- Ensures that all staff sign to indicate that they have read and understood:
 - [Keeping Children Safe in Education](#) 2024 (Part 1 for all staff; [Part 1, Part 5 and Annex A for all classroom-based staff](#))
 - The child protection and safeguarding policy
 - The staff behaviour policy (code of conduct)
 - The behaviour policy including de-escalation tactics, and are trained on acceptable restraint
 - Yardley's safeguarding response to children who go missing from education
 - The role of the designated safeguarding lead & how to get in touch
- Ensures that the child protection and safeguarding policy and procedures are reviewed and updated at least annually, working with the whole school, community of pupils, parents, staff, volunteers and governors and/or proprietors regarding this.
- Keeps a record of staff attendance at child protection training.

Coordinates Training & Induction

- Develops a training strategy to ensure that all staff obtain the appropriate training / updates, skills and knowledge to safeguard children effectively within the local Safer Partnership requirements.
- Undertakes appropriate training themselves, including attending regular DSL Forums, and is given appropriate time and resources to carry out the role. The DSL and deputies should undergo training every 2 years.
- Ensures that all staff understand that if they have any concerns about a child's welfare, they should act on them immediately, either by speaking to the DSL (or a deputy) or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.
- Ensures that all staff know how to make a referral to children's social care.
- Quality assures casework by other staff, possibly through supervision.

Raises Awareness

The designated safeguarding lead should:

- Ensure the school's or college's child protection policies are known, understood and used appropriately.
- Ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Ensures Safer Recruitment / Management of Allegations against Staff & Volunteers

- Ensures Safer Recruitment as per the Safer Recruitment policy; develops safeguarding induction strategy for all new / temporary staff.
- Ensures all staff, including temporary staff and volunteers have read the school's safeguarding policy and the Code of Conduct / Behaviour Policy prior to access to children.
- Ensures that the headteacher is aware of the responsibility under [Working Together to Safeguard Children](#) 2018 to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

It is important that DSLs obtain a full and rich picture of children's experience. As soon as staff identify indicators of concern, they should record all concerns (including lower-level/pastoral, concerns about a child's wellbeing – be it expressed in behaviour, presentation, relationships) on Edukey Safeguard, and if the concerns are serious, they should speak to the DSL without delay.

The Headteacher

Although DSLs take responsibility for Safeguarding in school, the Headteacher is ultimately responsible for all the children in school.

Headteacher should be contacted immediately in the event that possible harm (emotional, physical, sexual, neglect) to a child or young person has been caused by a member of staff or volunteer.

Leads by Setting Safeguarding Ethos

- Ensures that the child protection policy and procedures are understood and implemented by all staff.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Ensures that the culture of the school supports the provision of effective pastoral care and early help, and that staff do everything they can to support social workers when Children's Social Care become involved.
- Ensures that pupils are always provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.

- Communicating this policy to parents/carers when their child joins the school and via the school website

Prioritises Safeguarding

- Allocates enough time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- Supports the designated teacher for looked after children to promote the educational achievement of any pupils who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Ensures Safer Recruitment and Allegations against Staff & Volunteers (ASV)

- Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer in the Local Authority within one working day prior to any internal investigation.
- Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the Designated Officer.
- Acts as a 'case manager' to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- Makes decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable

Governing Body

Ensures that Yardley Primary:

- Appoints a Designated Safeguarding Lead who is a member of the senior leadership team and who has undertaken training in multi-agency working, in addition to child protection training
- Ensures that the DSL role is explicit in the role holder's job description (and the job description of any Deputy Designated Safeguarding Leads)

and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.

- Ensures that the DSL or a Deputy DSL is always available during school hours for staff to discuss any safeguarding concerns. The DSL or a Deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Skype or other such media.
- Ensures that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term school activities.
- Has a child protection policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- Has procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the headteacher and allegations against other children.
- Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification from providing childcare regulations.
- Develops an induction strategy that ensures all staff, including the headteacher, and volunteers receive information about the school's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction.
- Develops a training strategy that ensures all staff, including the headteacher, and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- Ensures that all staff, including temporary staff and volunteers, have read and understood the school's child protection and safeguarding policy and Staff Behaviour Policy (code of conduct) before they start work at the school.
- Appoints a designated teacher to promote the educational achievement of children who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders

or who were adopted from state care outside England and Wales; and ensures that the designated teacher has appropriate training.

- Contributes to multi-agency working and plans.
- Ensures an effective pastoral care offer and Early Help offer.
- Ensures that children are taught about how to identify risks, including online, and how to access support and help.
- Ensures that the voice and lived experiences of children are heard and reflected in the life of Yardley Primary.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes;
 - Making sure the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 2 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).

All governors will read [Keeping Children Safe in Education](#) in its entirety.

Chair of Governors

- The governing body nominates a member (normally the chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the headteacher.

Link Governor for Safeguarding

- The governing body also identifies a named governor to take leadership responsibility for the school's safeguarding arrangements (Link Governor for Safeguarding). That governor will maintain regular contact with the DSL, meeting each half term, and will ensure that the governing body receives regular reports about safeguarding activity at Yardley.
- It is the responsibility of the governing body to ensure that the school's safeguarding, recruitment and managing allegations procedures consider the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.
- The governing body is also responsible for overseeing Safeguarding Audits completed and returned to the Local Authority under s175 of the [Education Act 2002](#).

Staff Training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

New staff, volunteers and governors, including supply staff, will receive a safeguarding induction:

- the school's child protection and safeguarding policy
- the staff behaviour policy (code of conduct)
- the identity and role of the DSL and all Deputy DSLs
- the school's behaviour policy
- the school's safeguarding response to children who go missing from education.

All staff, including the headteacher (unless the headteacher is the DSL), volunteers and governors will receive appropriate and regularly updated safeguarding and child protection training and thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children

effectively in line with statutory guidance and any requirements of the local safeguarding partnership.

The DSL will attend training for newly appointed DSLs and refresher training within a two-year period. In addition, the DSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development. This includes attendance at the DSL Forums.

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, previously looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, child on child abuse, sexual harassment and sexual violence in school, extremism, female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online.

In addition, the headteacher (and/or other school leaders as appropriate) and at least one governor (usually the chair) will attend safer recruitment training and the school will ensure that there are at least two school leaders and/or governors that have attended safer recruitment training within the past three years.

Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of [Keeping Children Safe in Education](#), and will be in line with local safeguarding procedures.

See appendix 1 of this policy for more information about our safer recruitment procedures.

Record Keeping and Information Sharing

The School's record-keeping policy for child welfare and child protection is consistent with DfE guidance, which is known to all staff.

- Recording of concerns should take place as close in time to the incident as reasonably possible, by using 'edukey safeguard' via unique log-ons.
- There are shared computers in place. The website can also be accessed on phones and tablets. The web-address (if no link is on the desktop) can be found in the staffroom.
<https://edukeyapp.com/safeguard-find-school/forced>
- In addition to logging concerns, staff should seek to speak to a DSL immediately either in person or by phone.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local

authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

All child protection documents will be retained in a 'Child Protection' file, separate from the child's main file. The main file will clearly show an alert that a child protection file exists and the location of this. This child protection file will be locked away and only accessible to the head teacher and the designated safeguarding lead. These records will be copied and transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of Designated Person Child Protection. Original copies will be retained according to school policy on retention of records. Records will be kept until the child/children reach 25 years of age, in paper and electronic forms.

To allow the new school to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In order to keep children safe and provide appropriate care for them, we require accurate and up to date information regarding:

- Names and contact details of persons with whom the child normally lives
- Names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above)
- Names and schools/settings of any siblings
- Details of any persons authorised to collect the child from school (if different from above)
- Any relevant court orders in place including those, which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- If the child is or has been subject to a child protection or care plan
- Name and contact details of G.P.

- Any other factors which may impact on the safety and welfare of the child

The school will collate, store and agree access to this information. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Confidentiality

The school will operate with regard to [Information Sharing: Guidance for practitioners and managers \(2018\)](#) and has a clear and explicit Confidentiality Policy.

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child's safety and welfare must be the overriding consideration.

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- o The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
 - The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
 - If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
 - Confidentiality is also addressed in this policy with respect to record-keeping page 20, and allegations of abuse against staff in appendix 2.

Photography and Images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils we will:

- seek their consent for photographs to be taken or published (for e.g., on our website or in newspapers or publications)
- seek parental consent
- use only the pupil's first name with an image
- ensure pupils are appropriately dressed

- encourage pupils to tell us if they are worried about any photographs that are taken of them
- We comply with GDPR

Extended School and Off-Site Arrangements

Where extended school activities are provided by and managed by the school, our own safeguarding policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. If the school receives an allegation relating to an incident where an individual or organization was using the school premises for running an activity for children, we will follow our safeguarding procedures and policies and inform the local designated officer (LADO), as we would with any safeguarding allegation.

Information About Safeguarding for Pupils

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and sex and relationships lessons and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children, and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Partnership with Parents

The school shares a purpose with parents to educate and keep children safe from harm and to have their welfare promoted. We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

The school will, in most circumstances, endeavor to discuss all concerns with parents about their children. However, there may be exceptional circumstances when the school will discuss concerns with Social Care and/or the Police without parental knowledge (in accordance with the London Child Protection). The school will, of course, always aim to maintain a positive relationship with all parents. The school's child protection policy is available on request.

Child & Young People's Disclosures to Staff

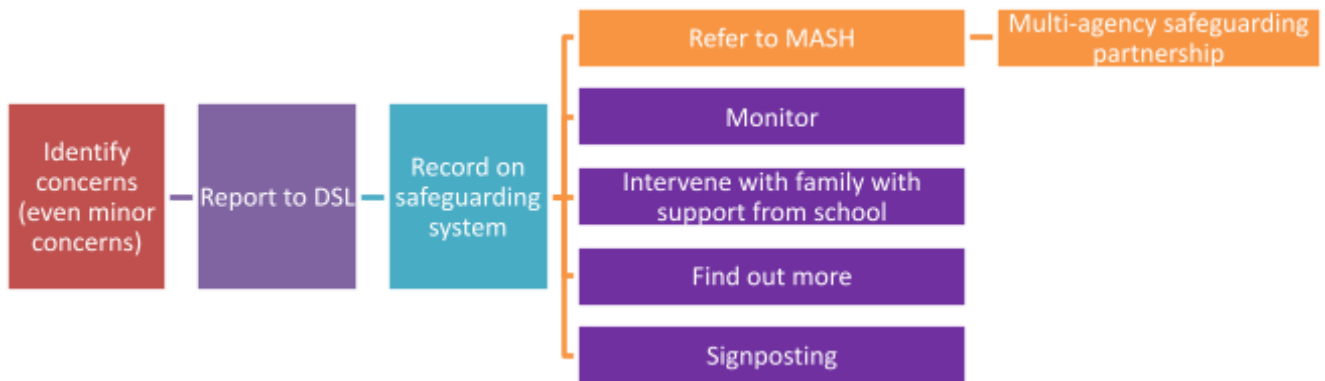
Children and young people may disclose concerns to staff and may do so knowing that what they are disclosing is a concern, and sometimes they will be unaware that their disclosure will signal concerns. Wherever possible, staff should make the time and space to listen and understand what the child / young person is disclosing. Staff should not be afraid to respond to children naturally, as they would for any other disclosure, and should respond with compassion and empathy.

If disclosures are concerning but vague, the DSL or other staff may need to speak to the child further in order to obtain enough information to meet the threshold. In these circumstances, DSL and staff should agree how this will take place and the practitioner should use open questions (including questions starting with 'when', 'where', 'why', 'how', etc).

Recording

- Recording of concerns should take place as close in time to the incident as reasonably possible, by using 'edukey safeguard' via unique log-ons.
- There are shared computers in place. The website can also be accessed on phones and tablets. The web-address (if no link is on the desktop) can be found in the staffroom.
<https://edukeyapp.com/safeguard-find-school/forced>
- In addition to logging concerns, staff should seek to speak to a DSL immediately either in person or by phone.

DSL Decision-Making



Once concerns are identified and shared with DSLs, DSLs and involved staff will decide together how best to proceed to support the child and to mitigate the risk. DSLs can consult with MASH at any point. Options for action are:

1) Pastoral care

[Keeping Children Safe in Education](#) 2024 acknowledges the casework that schools undertake on a pastoral level. This includes managing any support for the child internally via the school's own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.

2) Early Help (MASH)

Schools can refer children and families for early help assessment and support, with the informed consent of parents.

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. School will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

3) Referral to statutory services (MASH)

A referral must be made to MASH/children's social care (and if appropriate the police) immediately if the child is:

- a. A child in need; defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or

development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled

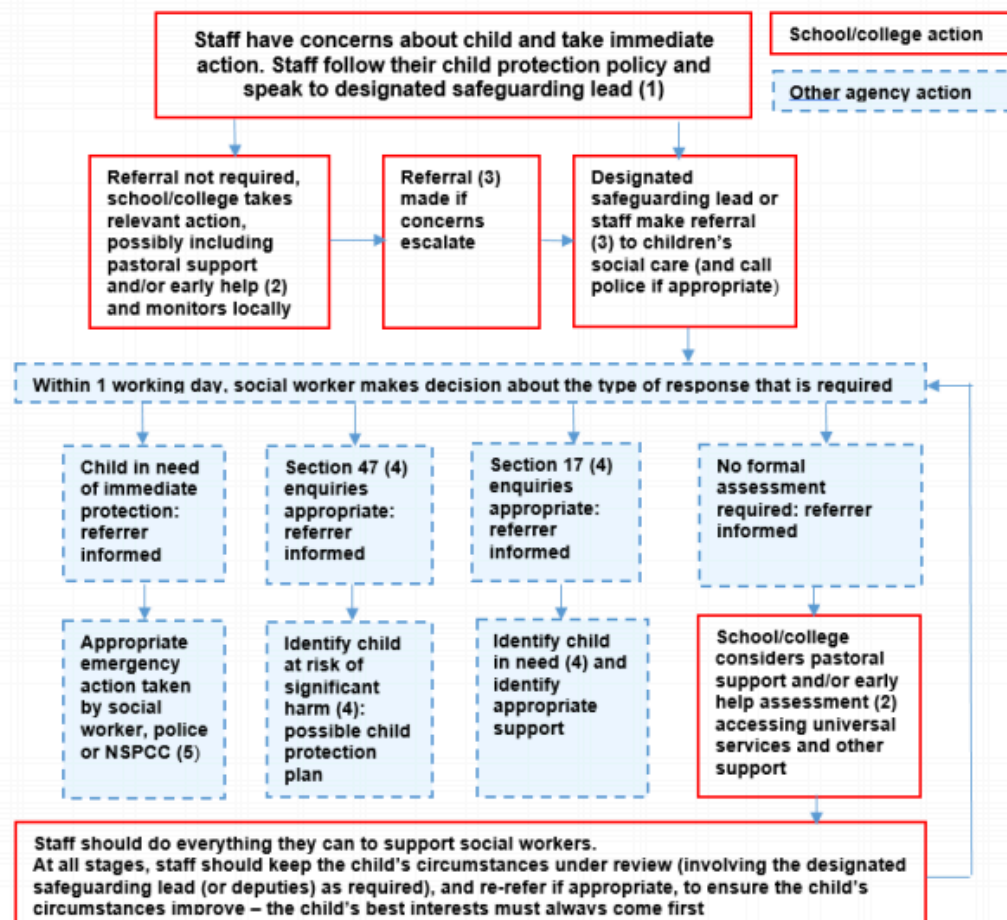
b. Suffering, or likely suffering, harm.

4) Allegation of harm to a child by a practitioner

If the alleged harm to a child is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.

- Following a number of cases nationally where senior leaders in schools failed to act upon concerns raised by staff, [Keeping Children Safe in Education](#) 2024 emphasises that any member of staff must contact and/or make a referral to Children's Social Care if they are concerned about a child, if their DSL does not share their views.

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member.

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

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

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

(5) This could include applying for an Emergency Protection Order (EPO).

Referrals

- [Multi-agency Safeguarding Hub \(MASH\)](#) is Waltham Forest's single point of referral to social care for concerns regarding children, young people and vulnerable adults:
 - Early Help (parental consent needed)
 - Child in Need
 - Child Protection
 - Adult Safeguarding
- Referrals to the Multi-agency Safeguarding Hub (MASH) should be made immediately when there is a concern that the child is suffering significant harm or is likely to do so.
- It is good practice to notify MASH by phone and/or email to discuss the case prior to sending a written referral. This will help determine the level of intervention and will also give children's social care and the police time to make arrangements to come and see the child that same day in school, if deemed necessary.
- In Yardley the DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the child. Still, there are circumstances where another member of staff must refer without delay:

- If for some reason (e.g., during the summer break), the DSL is not available, the referral should be made without delay by any other member of school staff
- If you disagree with your DSL's decision not to refer a case to MASH, it is your responsibility to refer the case, and to respectfully inform the DSL that you are doing so.
- Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

Holding Children in School After a Referral to MASH

- Sometimes MASH social workers and police will want to see a child on the day of referral to ensure that they are safe to go home. In such cases, they will ask you to keep the child in school until the visit has taken place.
- Because it can take time to organize the visit with an available social worker and police officer, sometimes families will be asked to wait at school before a child is released to them, and they may be asked not to see their child during this time.
- This can be stressful and uncomfortable for both schools and families and sometimes all are kept at school until late in the evening. School should prepare families for the length of time this process can take and treat them with compassion and understanding, and make every attempt to facilitate this difficult process.
- Although Schools do not have legal powers to remove or detain children, both police and social workers do have such powers, and it is at their request that schools are holding the child. For this reason, families are strongly advised to cooperate in order to ensure the best chances that children will be able to go home that evening.

Support for Pupils, Families and Staff

Child abuse is devastating and traumatic for children and families. It can also result in secondary trauma in those staff who are involved in these cases.

We will support pupils, their families, and staff by:

- Taking all concerns and disclosures seriously
- Nominating a link person (*usually the DSL*) who will keep all parties informed
- Appointing a separate link person where the DSL is the subject of an allegation
- Prioritising mental health and resilience, and accepting that everyone can have a bad day

- Responding sympathetically to any request from pupils or staff for time out to deal with distress
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Storing records securely
- Signposting to helplines, counselling or other avenues of external support
- Following procedures in safeguarding, whistleblowing, complaints and disciplinary procedures
- Cooperating fully with relevant statutory agencies.

Identifying children and young people who may be suffering significant harm

Recognising Abuse

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs, which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

As in the Children Acts 1989 and 2004, a **child** is anyone who has not yet reached his/her 18th birthday; **Harm** means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; **Development** means physical, intellectual, emotional, social or behavioural development; **Health** includes physical and mental health; **Ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical.

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people. Children may be abused in a family or in an institutional or community setting, by those known to them, or, more rarely, by a stranger. The Four categories of abuse are physical, emotional, sexual or neglect.

Four Types of Abuse

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

Sexual Abuse and Exploitation Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not

understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women and children are also perpetrators. Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 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, though it may occur alone.

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse.

Neglect usually indicates a relationship issue between the parent and child.

A key task for staff and volunteers is to record all instances of neglect, however minor. This builds up a picture of the child's lived experience and provides the crucial evidence required at point of referral.

There are many different aspects in which neglect can manifest:

- Physical Neglect or Deprivation of Needs
- Medical Neglect
- Supervisory Neglect
- Environmental Neglect
- Educational Neglect
- Emotional Neglect

Possible Issues

Safeguarding covers more than the contribution made to child protection in relation to individual children. It also encompasses issues such as pupil health and safety, bullying and a range of other issues, for example, arrangements for meeting the medical needs of children, providing first aid, school security, drugs and substance misuse, positive behaviour etc. There may also be other safeguarding issues that are specific to the local area or population.

Specific Safeguarding Concerns

Bullying, Child on Child Abuse and Harmful Sexual Behaviour (HSB)

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. The subject of bullying is addressed at regular intervals in PSHE education. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures. Bullying is discussed further in our behavior policy.

This school believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other students in the school.

Children may be harmed by other children or young people; research suggests that 30% of child abuse is perpetrated by those under 18.

All staff recognise that children can abuse their peers and are trained to understand and implement the school's policy and procedures regarding child-on-child abuse.

All child-on-child abuse is unacceptable and will be taken seriously.

It is most likely to include, but is not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sexting including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
- Up skirting, which typically involves taking a picture under a person's clothing without their consent, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (up skirting is a criminal offence and may constitute sexual harassment);
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the school's anti-bullying procedures.

All pupils and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals in PSHE education.

All members of staff receive a copy of the school's behaviour policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and child on child abuse proactively.

Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls'.

There is the recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being recorded.

It is important for the school to consider the wider environmental factors and context within which child on child abuse occurs.

The school will also consider the potential for the impact of the incident to extend further than the school's local community (e.g. for images or content to be shared around neighbouring schools) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities.

There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

Online concerns can be especially complicated. Support is available from The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation at <https://www.iwf.org.uk/>.

The term 'harmful sexual behaviour' (HSB) is used to describe a continuum of sexual behaviours, from inappropriate to problematic to abusive.

There is a range of common and healthy behaviours at different developmental stages. When a child or young person behaves in ways considered to be outside this range, their behaviour may be called 'harmful' because it is harmful to themselves or others. HSB in pre-adolescent children is more likely to be at the 'inappropriate' or 'problematic' end of the continuum rather than being 'abusive' or 'violent'. Young children may be 'acting out' abuse they have

experienced themselves or responding to other trauma or neglect. (reference: csacentre.org.uk)

Child on Child, Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable.

While it is important that all victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

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

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

- A child under the age of 13 can never consent to any sexual activity
- A child under 18 cannot consent to any sexual activity with a person in a position of trust
- The age of consent is 16.
- Sexual intercourse without consent is rape.

Sexual harassment in the context of child on child behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Yardley therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies; and through the curriculum.

The school will respond to reports in accordance with Part 5 of [Keeping Children Safe in Education](#) 2024.

All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using their professional judgement and supported by other agencies, such as children's social care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Risk assessment

- The risk and needs assessment will consider:
 - the victim, especially their protection and support;
 - the alleged perpetrator/s (if she/he/they attend the same school); and
 - all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them.
- The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required.

- Police are notified when a crime may have occurred.
- Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

Action following a report of sexual violence and/or sexual harassment - what to consider

The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead the school's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks the school not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- whether there are ongoing risks to the victim, other children, adult students or school staff;
- informing parents/carers unless this would put the victim at greater risk);

only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, vocational staff may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images, nude or semi-nude images/videos also including computer-generated images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong

- o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- o That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- o The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- o That they should speak to the DSL if they have any concerns
- o That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Domestic Abuse/Violence

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

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

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

At Yardley Primary School we are working in partnership with Waltham Forest Police and Waltham Forest Council to identify and provide support to pupils who have experienced domestic abuse/violence in their household. This project is called **Operation Encompass**. In order to achieve this Waltham Forest Police will share information on domestic abuse/violence incidents where one of our students has been present.

On receipt of this information the DSL will decide on the appropriate support the child/children require, this could be silent or overt.

We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) and County Lines

Waltham Forest has taken a public health approach to children and young people's criminal exploitation by organized criminal groups (OCGs) and gangs.

Both CSE and CCE occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or other advantage of the perpetrator or facilitator.
- And/or through violence or the threat of violence.

The victim may have been sexually and/or criminally exploited even if the child does not view themselves as a victim. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

Victims of CSE and CCE can be of any gender. Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through the offer of friendship, relationships and care, gifts, drugs, alcohol, money and accommodation.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs

groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

- Child criminal exploitation may include activities such as:
 - a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as [county lines](#)
 - a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated
 - a child being forced to commit crime in order to settle actual or fabricated debts
 - gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang
 - a child being encouraged or manipulated to commit crime via social media
 - a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.

Advice for schools and colleges is provided in the Home Office's [Preventing youth violence](#) and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

- All staff are trained to be vigilant about and report indicators of CSE and CCE including:
 - acquisition of money, clothes, mobile phones, etc. without plausible explanation
 - gang-association and/or isolation from peers/social networks
 - children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them
 - exclusion or unexplained absences from school.

- leaving home/care without explanation and persistently going missing or returning late
- excessive receipt of texts/phone calls
- returning home under the influence of drugs/alcohol
- inappropriate sexualised behaviour for age/sexually transmitted infections
- evidence of/suspicious of physical or sexual assault
- relationships with controlling or significantly older individuals or groups
- multiple callers (unknown adults or peers)
- frequenting areas known for sex work
- concerning use of internet or other social media
- increasing secretiveness around behaviours
- self-harm or significant changes in emotional well-being.

Although the pre-existing vulnerabilities increase the risk of child sexual and/or criminal exploitation, not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues.

A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

The Home Office has released guidance: [County lines: criminal exploitation of children and vulnerable adults](#)

Contextual Safeguarding

Contextual safeguarding means that assessments of children should consider whether wider environmental factors which are present in a child's life that are a threat to their safety and/or welfare.

Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm.

Yardley will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care.

Online Safety

Children and young people commonly use electronic equipment including mobile phones, tablets and computers daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding and wellbeing issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

The breadth of issues within online safety is considerable, but can be categorised into four areas of risk:

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, including computer-generated imagery), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in school. Many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

The school's online safety policy explains how we try to keep pupils safe in school and protect and educate pupils in the safe use of technology. The school has appropriate filters and monitoring systems in place to protect children from potentially harmful online material.

Cyberbullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sexting' below). Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns.

Staff must not use their personal mobile phones to communicate or take photographs at the school, in the presence of children.

The school's online safety coordinators are: Mrs Odysseas and Miss Emerson.

Youth Produced Sexual Imagery (YPSI) or 'Sexting'

The school will act in accordance with advice endorsed by DfE [Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety 2024\)](#). All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people (under 18) who share sexual imagery of themselves or their peers are breaking the law. Still, authorities will avoid criminalising young people unnecessarily.

All incidents of YPSI should be reported to the DSL. If there is a YPSI issue in relation to a device (e.g., mobile phone, tablet, digital camera), the member of staff will secure the device (i.e., it should be confiscated). This is consistent with DfE advice [Searching, Screening and Confiscation - Advice for headteachers, school staff and governing bodies 2022](#). Staff will not look at (unless directed to do so by police), copy or print any indecent images as this would be a criminal offence. The confiscated device will be passed immediately to the DSL.

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police via the MASH immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is experimental (e.g., a child sending an image to a child with whom they are romantically involved) or aggravated.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured. Aggravated incidents of sexting will be referred to MASH.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

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

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

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

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

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children absent from Education and Children Missing from Education (CMfE)

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse, exploitation and neglect, including sexual abuse and sexual exploitation. The attendance lead will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

We follow the 'Working Together to Improve School Attendance Guidance' and will refer all cases of concern to our Education Welfare Officer (EWO) or Attendance Lead. The school also refers to the Waltham Forest locally agreed policy and procedures.

Where parents inform our school that they wish to 'home educate' their child, we will inform the Local Authority in accordance with the Elective Home Education procedure.

In Waltham Forest, the Behaviour, Attendance & Children Missing Education Service within Early Help is responsible for agreeing and monitoring CMfE (Children Missing from Education) with the Procedures for Once a School Place has Been Offered.

Female Genital Mutilation

FGM is a cultural practice and is illegal in the UK and is considered violation of human rights by the United Nations. It is considered as a form of child abuse with harmful consequences in short and long term. Individuals, groups in relevant communities and professionals in all agencies need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

In the UK, FGM is a criminal offence and a harmful form of child abuse. It is illegal to practice in the UK and/or anyone involved in taking girl outside of the UK to have FGM carried out will be punished under the [FGM Act 2003](#) and [Serious Crime Act 2015](#). LBWF follows a comprehensive approach comprising care, prevention, enforcement, through promoting protection measures and safeguarding young girls from FGM. 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. Our school will operate in accordance with the statutory requirements relating to this issue, and in line with existing local safeguarding procedures

Preventing Radicalisation

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

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- o Negate or destroy the fundamental rights and freedoms of others; or
- o Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- o Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

Prevent Duty

At Yardley Primary we are fully aware and committed to the on-going protection and safety of our pupils, staff and wider community in accordance with DfE guidance [Working together to Safeguard Children \(2018\)](#) and [Keeping Children Safe in Education \(2024\)](#). An integral part of that work relates to the government's PREVENT strategy and the duties it places on academic institutions.

We are committed to providing a secure environment for pupils, where children feel safe and are kept safe. All adults in our school recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. Staff will be alert to issues including:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture

By continually developing our leadership and accountability practices, staff training opportunities (primarily the Home Office developed WRAP Training), referral systems and management of those referrals, we strive to demonstrate a pro-active and diligent approach to this aspect of our responsibilities as educators and safe-guarders.

Aligned with a consistent delivery of a broad and balanced curriculum and use of the Local Authority-sanctioned Self-Assessment framework, we strive to protect our students - and the wider community - against the threats of

extremism, through the promotion of both fundamental values and cohesion amongst our communities.

We also recognise that further information and support is available from the Multi-Agency Safeguarding Hub (0208 496 2310) and the Local Authority's Community Safety Team (0208 496 3000) and the school's Prevent Coordinator.

Private Fostering Arrangements

A private fostering arrangement occurs when someone **other than** a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

<https://www.walthamforest.gov.uk/families-young-people-and-children/fostering-and-adoption/private-fostering>

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school should notify the local authority of the circumstances.

Helping children to recognise risk and access support

A key mechanism for [Keeping Children Safe In Education](#) is ensuring that they are given an understanding of how to recognise risk and where to go for help when they need it. Giving children and young people an understanding of what is and is not appropriate in professional conduct and in their home/care can improve identification of concerns and reporting about themselves and their

peers. School staff can enhance this further by building trusting relationships with children, using professional curiosity, and speaking to the DSL, or the deputies, about any concerns for a pupil.

At Yardley we encourage a range of ways for children to report concerns (e.g. feelings box, playground friends and face to face). Using peer support is another way to give pupils the opportunity to discuss difficult topics and get the help needed.

[Keeping Children Safe in Education](#) 2024 requires governing bodies and proprietors to ensure that children are taught about safeguarding, including online safety, as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our [PSHE](#) and [RSE](#) lessons and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Relationships Education is compulsory for all pupils receiving primary education. Health Education is compulsory in all schools except independent schools. Personal, Social, Health and Economic Education (PSHE) continues to be compulsory in independent schools.

Children are also taught about their rights through our [Rights Respecting School Award](#). The UK Committee for UNICEF works with schools in the UK to create safe and inspiring places to learn, where children are respected, their talents are nurtured and they are able to thrive. These values are embedded in daily school life and give children the best chance to lead happy, healthy lives and to be responsible, active citizens.

We understand the importance of preventative education in the context of a whole-school approach. Our aim is to ensure that it prepares pupils and students for life in modern Britain.

Safeguarding Children: Whistle Blowing

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

All staff are made aware of the duty to raise concerns about the attitude or actions of staff in line with the school's Code of Conduct / Whistleblowing policy.

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk. We want everyone to feel able to report any child protection / safeguarding concerns. However, for members of staff who feel unable to raise these concerns internally, they can call the NSPCC whistleblowing helpline on: 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or email: help@nspcc.org.uk. Staff are also able to contact the Local Authority Designated Officer lado@walthamforest.gov.uk or 0208 496 3646

Parents or others in the wider school community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: help@nspcc.org.uk

You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or young person who are targeted. These children need someone like you to safeguard their welfare.

Don't think what if I'm wrong - think what if I'm right

Reasons for whistleblowing

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour
- To prevent the problem worsening or widening
- To protect or reduce risks to others
- To prevent becoming implicated yourself

What stops people from whistle blowing

- Fear of starting a chain of events which spirals out of control
- Disrupting the work or project
- Fear of getting it wrong
- Fear of repercussions or damaging careers
- Fear of not being believed

How to raise a concern

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken
- Try to pinpoint exactly what practice is concerning you and why
- Approach the Headteacher
- If your concern is about your immediate manager/Headteacher, speak to the Chair of Governors or if you feel you need to take it to someone outside the school, contact the MASH team and ask for the LADO (local authority designated officer)
- Make sure you get a satisfactory response - don't let matters rest
 - Ideally, you should put your concerns in writing, outlining the background and history, giving names, dates and places wherever you can
- **A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.**

¹Staff includes any adult, paid or voluntary, who works in a school or educational establishment within the Local Authority.

What Happens Next

- You should be given information on the nature and progress of any enquiries
- Your employer has a responsibility to protect you from harassment or victimisation.
 - No action will be taken against you if the concern proves to be unfounded and was raised in good faith
- Malicious allegations may be considered as a disciplinary offence

Self Reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and

personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Further advice and support

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from your line manager, HR department and/or your professional or trade union.

"Absolutely without fail- challenge poor practice or performance. If you ignore or collude with poor practice it makes it harder to sound the alarm when things go wrong" (reproduced with acknowledgement to "Sounding the Alarm" – Barnardos)

[Multi Agency Safeguarding Hub \(MASH\)](#)

Tel: 020 8496 2310 (Mon-Thurs 9am-5.15pm, Fri 9am-5pm), (out of hours 020 8496 3000)

Email: MASHrequests@walthamforest.gov.uk

Fax: 020 8496 2313

Appendices

Appendix 1: safer recruitment and DBS checks – policy and procedures

Safer Recruitment Policy

Safer Recruitment and Selection

Safer Recruitment

Yardley will ensure that our Safer Recruitment policy is in place and updated annually, and that it is followed meticulously for the recruitment of all permanent and temporary staff and volunteers.

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

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

Planning and Advertising

When advertising roles, we will make clear:

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

Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the

opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- o If they have a criminal history
 - o Whether they are included on the barred list
 - o Whether they are prohibited from teaching
 - o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - o Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

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

-

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

- Explore any potential areas of concern to determine the candidate's suitability to work with children
- At least one interview question about attitude to safeguarding and working with children
- At least one member of each recruitment panel will have attended safer recruitment training
- Record all information considered and decisions made

Pre-appointment vetting checks

- Obtain references for all shortlisted candidates via reference proforma, including internal candidates, and follow up by phone
- Carry out additional or alternative checks for applicants who have lived or worked outside the UK
- Ensure that applicants for teaching posts are not subject to a prohibition order
- check that applicants for management positions are not the subject of a s128 direction prohibiting or restricting them from taking part in the management of an independent school, academy or free school.
- Applicants only begin work after providing DBS certificates. Exceptionally, if an individual starts work in the regulated activity before the DBS certificate is available, the individual must be appropriately supervised, and the employment remains conditional on suitably clear checks.
- Barred List checks will always be taken prior to the individual starting to work in a school.

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

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

Vetting Appointment

- Offers of employment are fully conditional on unblemished DBS certificate (or a risk-assessed blemished DBS certificate that meets a high standard of safeguarding) and full references, using a references proforma (that requests whether candidates would be re-employed for the same post and whether there have ever been any safeguarding concerns), followed up by phone.

Induction

- Once appointed, a full safeguarding induction process must be put in place for all new staff, that includes rigorous monitoring in order to pick up any concerns early.
- All staff are required to sign to confirm they have received a copy of the safeguarding policy and Staff Behaviour Policy (code of conduct), and that they have read [Keeping Children Safe in Education](#) 2024.
- All relevant staff (teachers, teaching assistants, other classroom-based staff, lunchtime supervisors and members of the senior leadership team) and all those who work in before or after school care for children under eight are made aware of the disqualification legislation.

Third Party Organisations

- Yardley obtains written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly; and that those individuals are suitable to work with children.
- Yardley will ensure that any staff from third party organisations have suitable and up-to-date training in safeguarding.
- Trainees and Students on placements should be subject to the same checks as other members of staff. However, fee-funded trainee teachers' checks should be carried out by the training provider and should be judged by the provider to be suitable to work with children. The school is not required to record details of fee-funded trainees on the Single Central Record.

Recording

- The school maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of [Keeping Children Safe in Education](#) 2024 and guidance.

Yardley endeavors to only employ suitable staff and allow suitable volunteers to work with children by complying with the requirements of [Keeping Children Safe in Education](#) 2024 together with the school's and the *Safer Recruitment* policy. School's are 'specified places' which means that most staff and volunteers will be engaged in Regulated Activity.

Volunteers

- Volunteers will undergo checks commensurate with their work in the school and contact with pupils. Under no circumstances will a volunteer

who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

- Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

Regulated activity means a person who will be:

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

Contractors

- The school checks the identity of all contractors and their staff on arrival at the school and requests DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in regulated activity, barred list checks are also requested.
- Contractors who have not undergone checks will not be allowed to work unsupervised or in regulated activity.

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and if needed check identification and reason for visiting before allowing them to enter the setting. Visitors are expected to sign the visitors' log and wear a visitor's badge.

We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Adults who supervise pupils on work experience

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

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

Governors

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

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

Appendix 2: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

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

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

Procedure for dealing with allegations

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

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

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

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

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.

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy

- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

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

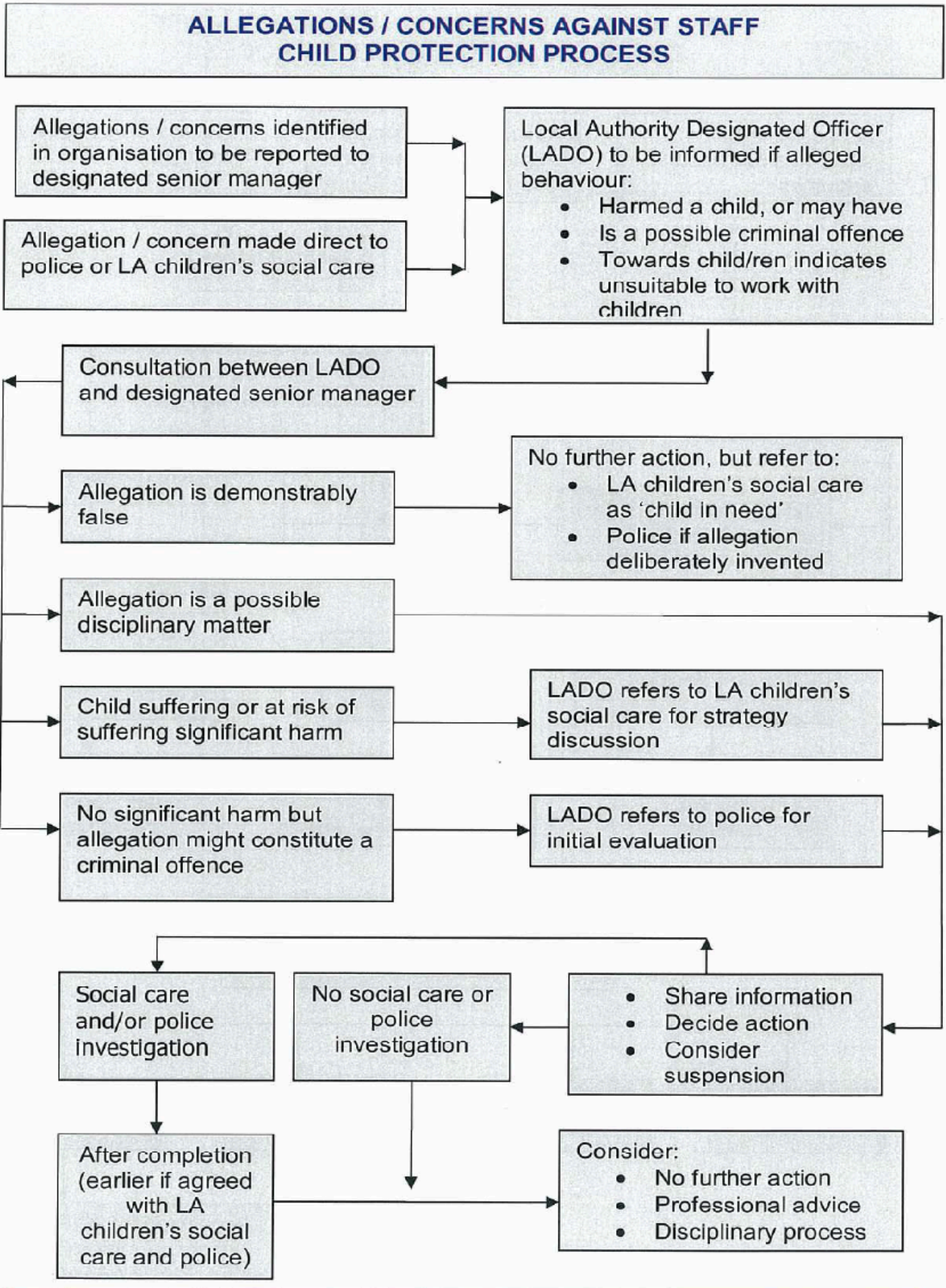
Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

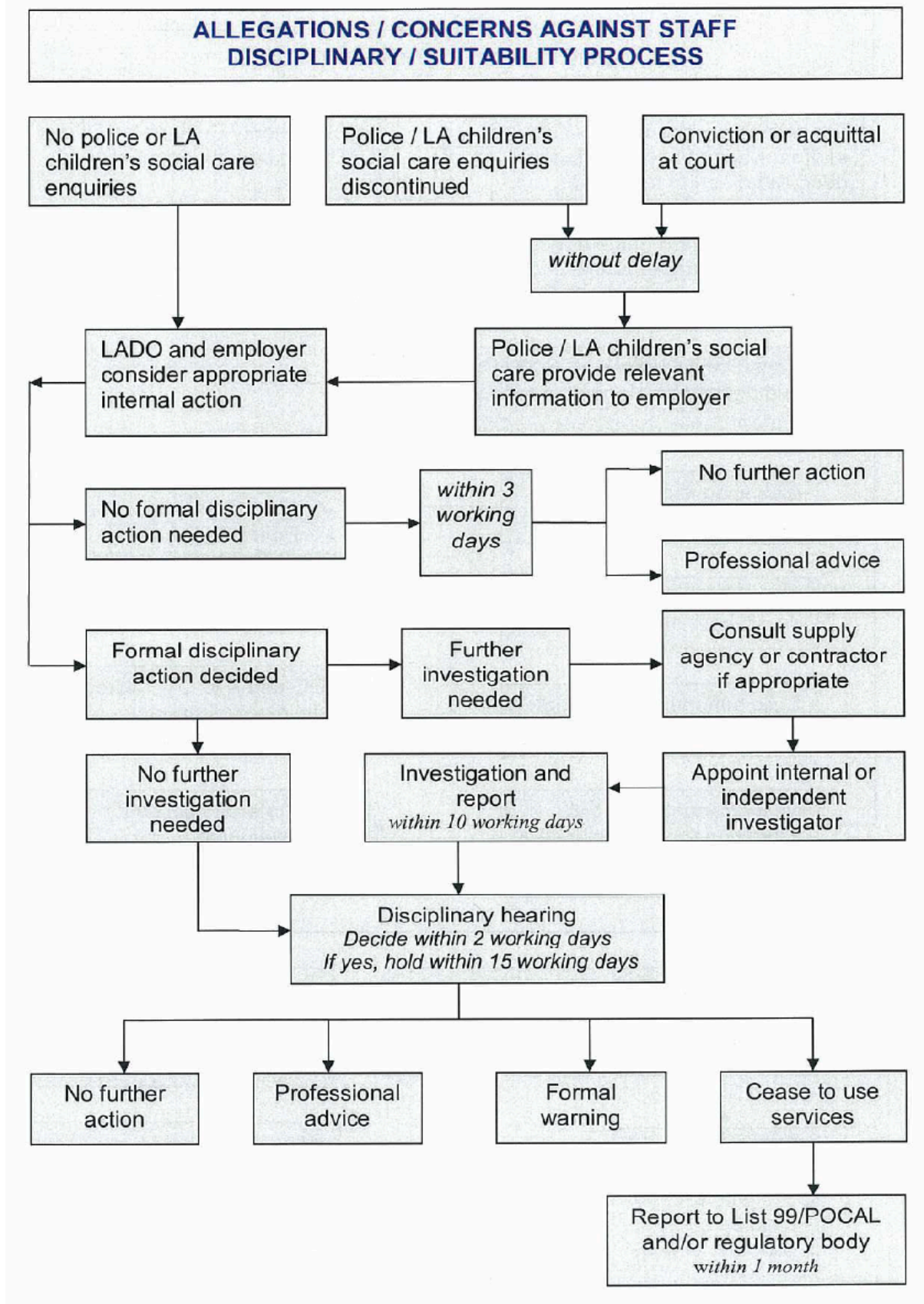
We will not include low-level concerns in references unless:

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

Appendix 2: Allegations/Concerns Against Staff Child Protection Process



Appendix 2: Allegations/Concerns Against Staff Disciplinary/Suitability Process



Appendix 4. Thresholds for social care intervention



Thresholds for social care intervention

Level 1 – Universal

Universal services are key partners in the delivery of a preventative approach to improving outcomes for children and young people. Services delivered at the universal level meet the needs of most children and young people. These ‘universal services’ are those services (sometimes also referred to as mainstream services) that are provided to or are routinely available to, all children and their families. Universal services are designed to meet the sorts of needs that should enhance the lives and wellbeing of all our children.

Most children will not require intervention beyond the universal level of support within the borough available to all children – these will not require social care intervention.

Level 2 – Vulnerable

Vulnerable needs requiring targeted support, when the needs of the child can no longer be fully met within Universal provision. These children and their families may have low level additional needs that are likely to be short term and that are sometimes known but unmet. In this context, a Common Assessment should be completed with the family and child or young person. At this point the Team around the Child and Family processes should commence if support is required from more than one professional service. The team is coordinated by a Lead Professional to provide a consistent link for the family.

WF [Early Help and Threshold Criteria for Intervention](#) lays out the agreed thresholds for intervention at different levels of risk to children and young people within Waltham Forest. Early Help intervention requires parental consent and engagement. Providing early help is more effective in promoting the welfare of children than reacting later. The aim is to prevent further issues arising and current issues escalating.

In cases where consent is not given for an early help assessment, practitioners should consider how the needs of the child might be met. If at any time it is considered that the child may be a child in need, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to [MASH](#).

Level 3 – Complex

For children and young people whose needs are complex, the lead professional will be a social worker who will work closely with the child and family to ensure a single assessment and deliver the right support and intervention. These children will be eligible for social care services, outlined in a Children in Need plan, because they are at risk of moving to a higher threshold for intervention from specialist services. In most cases the social worker will act as the lead professional to coordinate the work of all agencies with the child and family. “Asset” is the risk assessment tool used to assess the likelihood of a Young Person going on to commit an offence and to identify what areas of work need to be undertaken to reduce this risk.

Section 17 of the Children Act 1989 places a general duty on every Local Authority to safeguard and promote the welfare of children living within their area who are in need and to promote the upbringing of such children, wherever possible by their families, through providing an appropriate range of services. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Level 4 – Acute

Acute Specialist Services are required where the needs of the child or young person are so great that statutory and /or specialist help and intervention is required to keep them safe or to ensure their continued development. These span the multi-agency partnership including; Children's Social Care, Child and Adolescent Mental Health Services and Level 3 and 4 Youth Offending Services.

By effective integrated working in Waltham Forest, we aim to reduce the escalation of those children and families requiring targeted support to prevent more children requiring specialist and statutory interventions. To ensure the right support, in the right place at the right time.

In Waltham Forest we are developing a confident integrated workforce with a common core of knowledge and understanding to support and intervene effectively to safeguard children, young people and families.

A very small number of children for whom targeted support will not be enough will have more significant and acute needs which meet the threshold for Stage 4 intervention. This includes children who are experiencing significant harm or where there is a likelihood of significant harm and children at risk of removal from home.

s47 or Child Protection intervention is the process for children where there is reasonable cause to suspect that the child is suffering or likely to suffer significant harm (this includes immediate protection for children at serious risk of harm).

Appendix 4 Useful Contacts in Waltham Forest

<p>Multi-Agency Safeguarding Hub (MASH)</p> <p>Single point of referral for Early Help, Child Protection and Adults' Safeguarding in Waltham Forest</p>	<p>Phone: 020 8496 2310 Mon-Thurs, 9am-5.15pm and Fri, 9am-5pm Out of Hours: 020 8496 3000 Email: MASHrequests@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours</p>
<p>LADO Team</p> <p>Allegations against staff and volunteers (ASV)</p>	<p>Phone: 020 8496 3646 Email: lado@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours</p>
<p>Safeguarding in Education Team</p> <p>Consultations / Training / Support (traded service)</p>	<p>Phone: 020 8496 3646 Email: safeguardingineducation@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a phone response within 24 hours during normal business hours</p>
<p>Early Help</p>	<p>Phone: 020 8496 1517 Email: earlyhelp@walthamforest.gov.uk</p>
<p>Virtual School</p>	<p>Phone: 020 8496 1741 Email: virtual.school@walthamforest.gov.uk Head of Virtual School: fay.blyth@walthamforest.gov.uk</p>
<p>Special Educational Needs & Disability (SEND) Service [formerly known as Disability Enablement Service (DES)]</p>	<p>Phone: 020 8496 6503 Email: senteam@walthamforest.gov.uk</p>
<p>Corporate Director Children's Social Care (CSC)</p> <p>Inter-agency Escalation of concerns beyond escalation to Team Manager for Children's social care intervention</p>	<p>Phone: 020 8496 1907 Email: cspahub@walthamforest.gov.uk; amana.gordon@walthamforest.gov.uk</p>
<p>Corporate Director Quality Assurance (QA)</p> <p>Inter-agency Escalation of concerns beyond escalation to Team Manager for LADO intervention</p>	<p>Phone: 020 8496 3685 Email: cspahub@walthamforest.gov.uk; Darren.McAughtrie@walthamforest.gov.uk</p>

Local Safeguarding Children Board (LSCB) Local Safeguarding Partners (LSPs)	Email: strategicpartnerships@walthamforest.gov.uk
Child Death Overview Panel (CDOP) notifications	Phone: 020 8496 3691 Email: cdop@walthamforest.gov.uk
Female Genital Mutilation (FGM) Community Safety	Refer via MASH . Phone: 020 8496 3281 Email: Sylvie.lovell@walthamforest.gov.uk
Prevent Community Safety	Refer via MASH . Phone: 020 8496 3000 Mobile: 07816150037 Email: communitysafety@walthamforest.gov.uk ; Amy.Strode@walthamforest.gov.uk
Gangs Community Safety	Refer via MASH . Email: Adeolu.Solarin@walthamforest.gov.uk
Adolescent Safeguarding Lead Children's Social Care	Refer via MASH . Email: Reanne.Turner@walthamforest.gov.uk
Harmful Sexual Behaviour Lead Children's Social Care	Refer via MASH . Email: tracey.goddard@walthamforest.gov.uk Tel: 020 8496 5027 Mob: 0797 476 8433
MARAC / DRM queries	Refer via MASH . Dianne.Andrews@walthamforest.gov.uk
Mental Health First Aid / Public Health	catherine.hutchinson@walthamforest.gov.uk
Private Fostering	Refer via MASH . Email: Pamela.Levy@walthamforest.gov.uk Phone: 020 8496 1575
Violence against women and girls (VAWG) & Domestic Abuse one-stop-shop	Refer via MASH . Email: vawg@walthamforest.gov.uk ; domesticabuseadvice@walthamforest.gov.uk