



Building Personal Success

Child Protection and Safeguarding Policy

Brampton Primary School

Reviewed by: Alex Wedgbury and Paven Kettory

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School DSL: Sarah Fordham

School Deputy Safeguarding Leads: Alex Wedgbury, Marie Hardie, Olu Awelenje and Stefanie Reay

School Safeguarding Officer: Abdul Khaleque Begum

School Designated Governor: Susan Masters

School Chair of Governors: Yolanda Musinguzi

This policy is available on our school website and also on request from the school office. We inform parents and carers about this policy when their children join Brampton Primary School and through the school newsletter.

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Introduction

Our school is committed to developing and sustaining a strong safeguarding culture which supports us all to safeguard children, while creating a positive and respectful learning environment in which everyone can flourish.

“1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.

2. Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child.”
(Keeping Children Safe in Education, 2023)

The Governing Body (GB) and staff at Brampton Primary School fully recognise the contribution the school makes, in partnership with other agencies, to safeguarding children. We recognise that all staff, including volunteers have a full and active part to play in protecting our pupils from harm and to ensure that all young people are kept safe.

This **child protection and safeguarding policy** is therefore for all school and agency staff, parents, governors, volunteers and the wider school community. It forms part of the safeguarding arrangements for our school and should be read along with the following policies: Safer Recruitment, Staff Code of Conduct, Anti-Bullying, Equality, Behaviour for Learning, Attendance, Health and Safety, Educational Visits and E-Safety.

The United Nations Convention on the Rights of the Child (UNCRC) is at the heart of our school. At Brampton Primary School we recognise that all our children have the right to be treated with dignity and fairness, to be protected, to develop to their full potential and to participate.

As part of the ethos of the school we are committed to the following:

- Maintaining children’s welfare as our paramount concern
- Providing an environment in which children feel safe, secure, valued and respected; confident to talk openly and sure of being listened to
- Providing suitable support and guidance so that children have a range of appropriate adults who they feel confident to approach if they are in difficulties
- Using the curriculum to provide opportunities for increasing self-awareness, self-esteem, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others
- Working with parents to build an understanding of the school’s responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations
- Ensuring all staff are able to recognise the signs and symptoms of abuse and are aware of the school’s procedures and lines of communication
- Monitoring children who have been identified as ‘in need’ including the need for protection
- Keeping confidential records that are stored securely and shared appropriately with other professionals
- Developing effective and supportive liaison with other agencies

All staff are expected to have read and understood the following:

- Keeping Children Safe in Education (KCSiE) 2023
 - Part 1: Safeguarding information for all staff
 - Part 5: Child-on-child sexual violence and sexual harassment
 - Annex F: Table of substantive changes from September 2023
- Key changes to the KCSiE for 2023 (saved in T:\2. Staff Resources\Policies\23-24 Policies\Safeguarding and Behaviour)
- Safeguarding crib sheet (saved in T:\2. Staff Resources\Policies\23-24 Policies\Safeguarding and Behaviour)

This policy should also be read in conjunction with **KCSiE, Department for Education (DfE), 2023**, and with reference to the **Education Inspection Framework, Ofsted, 2023**.

Staff should be aware of the following documents:

- DfE statutory guidance 'Working Together to Safeguard Children'
- 'What to do if you're worried a child is being abused: Advice for practitioners' (DfE March 2015)

Those reading this policy may also want to read the **Newham Joint Position Statement on Everyone's Invited – Safeguarding all our children and young people in Newham, LBN 2021** (Appendix 7).

Sensitivity to Language

KCSiE uses 'victim' and 'perpetrator/alleged perpetrator' throughout, with a warning that such terms may not be helpful to use in front of or directly in addressing, children (see page 4 of the guidance).

We may say, 'reporting child' instead of 'victim', because a child may not see themselves as a victim. We attempt to say, 'reported child' when investigating incidents, rather than use labels like 'bully' or 'perpetrator'. **These words and other terms are thoroughly investigated for their meaning and impact as part of the safeguarding curriculum in our school.**

A key DfE statutory change for 2023 is using 'behaviour' and 'sanctions', rather than 'discipline'. Another change refers to children who are 'absent' rather than 'missing'. These changes apply throughout the Policy.

Definitions

Safeguarding is defined in KCSiE 2023 as the following:

- 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.

Statutory framework and content, plus the location of embedded safeguarding

The Education Act 2002 Section 175, (Section 157 for Independent schools) places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.

The development of appropriate procedures and the monitoring of good practice in the London Borough of Newham are the responsibilities of the Newham Safeguarding Children Partnership (NSCP).

Our school works in accordance with a range of legislation and guidance, which can be viewed in Appendix 10.

Our GB will support the SLT and teachers in ensuring that children are taught about how to keep themselves and others safe, including online.

Relevant topics will be included within Relationships Education (for all primary pupils), and and Health Education (for all primary and secondary pupils).

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Our school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Our programme is inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities).

School roles and responsibilities

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment that enables them to learn and achieve their full potential. However, there are identified key adults in schools and in the local authority who have specific responsibilities under child protection procedures. The names of those in our school with these specific responsibilities are shown on the front cover sheet of this policy. All staff in our school are familiar with the Early Help Offer. See Appendix 8.

The Governing Body

The GB ensures that a strong safeguarding culture is embedded within the school, that our commitment to keep our children safe is explicit and understood by all in the school community and that our practice reflects the GB's vision and values.

The GB ensures that all required policies relating to child protection and safeguarding (including Covid-19) are in place and that the child protection policy reflects statutory and local guidance. Safeguarding is a standing item on the agenda of all GB's meetings. The policy is reviewed at least annually.

The GB ensures that the policies, procedures, practice and professional development and training in our school are effective and comply with the statutory requirements at all times. The GB will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the Data Protection Act 2018 and the GDPR.

The GB ensures that there is a named DSL and deputy safeguarding lead(s) in place, that they have their safeguarding role explicitly within their job descriptions and are appropriately trained for their role, as set out in KCSiE 2023. The link governor/trustee for safeguarding visits the school regularly for meetings with the DSL and to observe safeguarding in school at first hand. The DSL reports directly to GB on issues arising from their role which impact on the school.

The GB checks that safeguarding is included in behaviour, online and all related policies including the staff code of conduct and is highlighted in all policies as the overarching responsibility of all staff at all times, particularly in procedures involving sanctions or searches, in school and out.

The GB ensures that the school contributes fully to inter-agency working in line with statutory and local guidance and uses the appropriate referral pathways. It ensures that information is stored and shared appropriately and in accordance with the statutory requirements as set out in the Data Protection Act 2018 and in line with GDPR (General Data Protection Regulation) requirements.

The GB ensures that all governors, staff members and volunteers undergo appropriate safeguarding and child protection training that is regularly updated, at least annually, to provide them with the relevant skills and up to date knowledge to keep all our children safe.

The GB ensures that all staff have the knowledge, skills and understanding of children who have an allocated social worker. It recognises their additional vulnerabilities with those of looked after and previously looked after children and monitors school action with all these children to keep them safe.

The GB ensures that children are taught to keep themselves safe, including on-line, making sure that appropriate filters and monitoring systems are in place in school. This responsibility includes children who are accessing on-line learning from our school, at home. Our children will also be taught how to keep themselves safe through teaching and learning opportunities in RSHE and through whole-school practice led by staff as part of the provision of a rich and balanced curriculum.

The GB and school leadership team are responsible for maintaining robust safer recruitment procedures that help to deter, reject or identify people who may abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place (see the school's 'Safer Recruitment' policy for further information). It also ensures that volunteers are appropriately supervised in school.

Designated Safeguarding Lead

The DSL in school takes the lead responsibility for managing child protection referrals, safeguarding training and raising awareness of all child protection policies and procedures in school. This includes a whole-school staff responsibility to support children affected by child on child abuse in all its forms, by following our protocol for listening, reassuring and reporting to

allow the child to move on. The DSL will ensure that everyone in school, including temporary staff, volunteers and contractors are aware of these procedures and that they are followed at all times.

The DSL will ensure that staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

The DSL is a source of advice and support to other staff on all child protection matters and makes sure that timely referrals to Newham Multi-Agency Safeguarding Hub (MASH) are made in accordance with current London Child Protection Procedures. The DSL works with the local authority, the Channel Programme and other agencies as required. If for any reason the DSL is unavailable, the deputy DSL will act in their absence.

The DSL will also be alert to the additional vulnerabilities of children with a social worker, ensuring that staff know who those children are, understand their academic progress and attainment and maintain a culture of high aspirations for these children. The DSL will also support staff to identify the challenges that children in this group may face and any additional support and/or adjustments that can make to best support them.

In addition, in most cases homelessness would be considered in the context of children living with their families, however the DSL will be alert that some children may be homeless independently and this will require a different level of intervention and support.

The DSL who has overall responsibility for child protection practice and safeguarding in our school is Sarah Fordham.

The deputy DSLs are as follows:

- Alex Wedgbury (Deputy headteacher)
- Marie Hardie (Deputy headteacher)
- Olu Awelenje (Assistant headteacher and SENDCo)
- Stefanie Reay (Assistant headteacher)

The headteacher, Paven Kettory, quality assures the safeguarding practices and procedures.

The senior safeguarding team (SST) is completed by the safeguarding officer, Abdul Khaleque Begum..

The DSL and deputies are responsible for the following:

- Co-ordinating child protection action within school, including being responsible for esafety
- Adhering to the Newham Safeguarding Children Board guidelines – Pan London Child Protection Procedures, relevant documents and procedures from the DfE, KCSiE 2023, Working Together to Safeguard Children 2018, The Prevent Duty 2015, Newham Safeguarding Children Partnership and school procedures with regard to referring a child if there are concerns about possible abuse
- Liaising with other agencies
- Ensuring that locally established procedures are followed including reporting and referral processes
- Acting as a consultant for staff to discuss concerns
- Working with parents and recognising where support is needed and referring to the local authority Early Help Team
- Making referrals as necessary
- Maintaining a confidential record keeping system
- Liaising with the Health and Safety coordinator to ensure that policies and procedures support safeguarding
- Representing or ensuring the school is appropriately represented at inter-agency meetings, in particular Child Protection Conferences, and that reports are provided for such conferences
- Managing and monitoring the school's part in Child Care/Protection Plans □ Liaising with other professionals

The DSL has responsibility online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see paragraph 141 of KCSiE 2023 for further information.

The Headteacher

The headteacher works in accordance with the requirements upon all school staff. In addition, the headteacher ensures that all safeguarding policies and procedures adopted by the GB are followed by all staff.

The headteacher will ensure that children are taught about safeguarding themselves and their peers, including e.g. the emotional impact of on-line nude image sharing, sexist abuse, body shaming or the sexual targeting of children with SEN or protected characteristics, as part of the broad and balanced curriculum. This includes covering relevant issues through Relationships, Sex and Health Education (RSHE) and through other curricular opportunities.

The headteacher ensures that all pupils, individually or collectively through our school council representatives are encouraged to promote the responsible use of social media, practical safety around the school and responsibility for their own and others' wellbeing, as an explicit, valued and integral element of a strong school safeguarding culture.

The headteacher ensures that there is immediate access to an individual member of staff, appropriately trained, to listen, reassure and provide practical support to move on, for children at need in the school.

The headteacher will make sure that they are satisfied that any children on the school roll placed with an alternative education provider can meet the needs of the child and obtain written confirmation that the appropriate safeguarding checks have been carried out.

All school staff – safeguarding children's futures

Everyone at our school has a responsibility to provide a learning environment in which our children can feel safe to learn and to ensure that every child has access to learning, even if circumstances preclude their physical presence in the school.

Staff are prepared to identify children who may benefit from early help and understand their role and responsibilities within this process. This includes identifying any emerging problems so appropriate support may be provided and in liaison with the DSL report any concerns. All staff members are aware of and follow school processes as set out in this policy and are aware of how to use the portal to make a referral to the Newham MASH when there is a need to do so.

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

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children. Our safeguarding culture in school depends upon every member of staff being proactive in recognising opportunities to promote and support the development of these protective factors.

This includes the use of appropriate forms of online communication directly from staff to children. We use the functions through Microsoft Teams as the platform for online learning. The use of social media (WhatsApp, X, Facebook, etc) for this purpose is inappropriate and would be regarded as a serious breach of professional boundaries.

All staff engage with and support children and their representatives / school council in promoting responsible use of social media, safety around the school and responsibility for their own and others' wellbeing, as an integral element of a strong school safeguarding culture.

General Strategies

At Brampton Primary School, children are encouraged to discuss their concerns through our PSHE curriculum, using parts of the Social and Emotional Aspects of Learning (SEAL) programme materials, provide opportunity for general discussion about an individual's rights to feel safe, secure, valued and respected. Children are encouraged to discuss many aspects of life, helping them to understand the dangers of abuse and how they can be protected. Opportunity is also given for children to voice their feelings and to understand that it is right to say "No" in certain situations.

As part of this programme, bullying and developing anti-bullying strategies will be addressed and a culture of 'telling' is encouraged. Pupils are encouraged to think positively about their relationships in school, feeling safe that the school operates an anti-bullying policy with strict consequences applied for any physically or verbally aggressive incidents within school. Children are supervised by a team of adults at playtimes and lunchtimes and concerns are listened to and acted upon. Year 6 pupils have received training as Peer Mediators and Play Leaders and they

are available to support children in playground situations. Children are aware that the school building is secure during the school day and reasons for the need for security are discussed openly with them. They are encouraged to notify adults in the playground area if they notice anything that makes them feel uncomfortable.

Our school culture of safeguarding ensures that the message that abusive behaviours are unacceptable is explicit through our curriculum, school environment and staff modelling appropriate language and respectful relationships. We do not accept that it is 'just part of growing up' or a joke. Our school manages such incidences in the same way by considering the need to undertake an immediate risk and needs assessment and as with any other child protection concern will follow the same procedures.

Where possible, 'strangers' in school will be introduced to children or their presence (in the case of people carrying out repairs on site) explained to the children. All adults, staff and visitors wear identification badges.

Procedures

All new members of staff, volunteers, students and those on work placement receive a child protection and safeguarding induction by the DSL or a member of the SST.

Visitors to our school receive a quick reference guide to our child protection and safeguarding policy which also highlights members of the SST.

All staff members have a duty to identify and respond to suspected and actual abuse or disclosures of harm. Any member of staff, volunteer or visitor to our school who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to the DSL or deputy DSL via SafeGuard, unless after 3pm, when it should be reported in-person to the DSL or deputy DSL. Concerns about a child at risk of radicalisation or extremism will also be raised this way.

All action is taken in accordance with the following guidance;

- Newham Safeguarding Children Partnership guidelines – Pan-London Child Protection Procedures
- KCSiE (DfE, 2023)
- Working Together to Safeguard Children (DfE, 2018)
- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

Where a child is suffering or is likely to suffer from harm, a child will be referred to the Newham Multi-Agency Safeguarding Hub (MASH) through the Newham MASH Portal or by calling **020 3373 4600**, immediately. Time-sensitive referrals may be telephoned first in case the child needs to be kept in school, pending a Section 47 Strategy meeting when a social worker will come to the school. Less urgent concerns or requests for support will also be referred via the Newham MASH Portal for consideration of Early Help support as appropriate. We will call police to the school directly if the risk is assessed as acute and immediate.

Practice when police are called to the school

There may be instances when it is deemed appropriate to call the police to school. Before calling police to the school, the DSL and senior staff will reflect upon the proportionality of this response, being aware of the child's rights under the Equalities Act and Human Rights Act and if

necessary, identifying and addressing concerns such as adultification if it is suspected of being present in staff decision making processes thus far.

Best practice for staff considering police intervention to be necessary should include the following:

- Consulting the DSL and headteacher or deputy about the reason to involve the police.
- Not searching a child by police at all, or taking them offsite to a police station without an appropriate adult (DSL, DDSL) being present if their parent/carer cannot accompany them

In the event that a child is interviewed on site by police, the DSL will act in loco parentis at that interview to provide support to the child. Parents/carers will be informed directly that the police have been called to the school in connection with their child, *subject to the safeguarding guidelines below*. A suitably trained Appropriate Adult (AA) must be present if the child is subsequently arrested and/or taken to a police station and the DSL will ensure that arrangements for such support are in place before the child leaves the school premises, with the reason for the arrest and the name of the appropriate adult concerned, confirmed.

Please see the following guidance for the roles and responsibilities: [Appropriate Adult | Youth Justice Legal Centre \(yjlc.uk\)](#); [DRAFT GUIDE FOR \(publishing.service.gov.uk\)](#)

No child / student may be subject to a search by police on school premises. Any such search should be carried out at the police station with an AA in attendance to the search.

Making Referrals to Newham's Multi-Agency Safeguarding Hub (MASH)

Wherever possible, the school will share any safeguarding concerns, or an intention to refer a child to the MASH with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the MASH or the Police in making decisions about when it is appropriate to share information with parents or carers.

If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for re-consideration of the case with the DSL who will escalate the concern as appropriate.

If, for any reason, the DSL or deputy DSL is not available, this should not delay appropriate action being taken. Contact details for Newham's MASH are available via the main school office and this link: [Newham Families Advice and Support | Safeguarding Children & Young People](#). All staff members have unfettered access to safeguarding support, should it be required. Any individual may refer to the Newham MASH where there is suspected or actual risk of harm to a child. All staff should be aware of how to access the portal.

If a child resides outside Newham the DSL will be aware of the need to refer to the MASH in the relevant local authority. If unsure, always refer to the Newham MASH who will forward to appropriate areas.

New Staff

All new members of staff are expected to go through child protection and safeguarding training.

As stated in paragraph 221 of KCSiE 2023, shortlisted candidates and new staff will be subject to some form of digital screening prior to interview.

Responding to concerns

Concerns for a child may come to the attention of staff in a variety of ways, for example through observation of behaviour or injuries or disclosure. Any member of staff who has a concern for a child or young person, however insignificant this might appear to be, should record the concern on Safeguard and discuss this with the DSL or deputy as soon as is practically possible and always before the end of the school day.

Early Help

All staff should, in particular, be alert to the potential need for early help for a child who falls into the following categories:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- 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 drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- has a parent/carer in custody

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

When new staff, agency staff, volunteers or regular visitors join our school they are informed of the safeguarding arrangements in place, the name of the DSL (DSL) and Deputy and how to share concerns with them. See Appendix 8 on Early Help pathways in Newham.

Training

The DSL and SST undertake child protection training appropriate to the role every two years as a minimum. The headteacher, all staff members and governors receive appropriate child protection training that is regularly updated. In addition, all staff members receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Records of any child protection training undertaken is kept for all staff and governors.

The school ensures that the DSL and deputies also undertake training in inter-agency working and other matters as appropriate.

Positive handling and de-escalation practice keeps children and staff safe in school. This is

refreshed at a minimum every 3 years and is undertaken by all staff in a rolling programme which builds a collegiate responsibility for everyone's safety and wellbeing.

All agency staff must complete the safeguarding induction programme before starting work in the school, which prioritises safeguarding practice and appropriate language to be used in school. Certificates for additional training, including positive handling, and the dates of the refresher are part of the recruitment process.

Record keeping

Staff can play a vital role in helping children in need or at risk by effective monitoring and record keeping. Any incident or behavioural change in a child that gives cause for concern should be recorded on SafeGuard Software and the concern brought to the attention of one of the DSL and deputies. It is important that records are factual and reflect the words used by the child as closely as possible. Opinion should not be given unless there is some form of evidence base which can be quoted. It is important to remember that all issues are confidential and staff should know only on a 'need to know' basis

If a child makes a disclosure of abuse to a member of staff they should do the following:

- Allow the child to make the disclosure at their own pace and in their own way.
- Avoid interrupting except to clarify what the child is saying (attentive listening/reflective feedback).
- Use Tell Explain Describe (TED) to clarify any unclear information without asking leading questions.
- Do not ask leading questions or probe for information that the child does not volunteer.
- Reassure the child that they have been heard and explain what you will do next and to whom you will talk.
- Alert the DSL/deputy for the phase as soon as possible and always before the child goes home.
- Record the details onto Safeguard Software before the end of the day.

Information to be recorded

All staff must ensure they complete every section of the online SafeGuard portal when reporting a concern, including the category of abuse. They should also record the following:

- The information which gives cause for concern with dates and times
- A verbatim record of what the child has said
- If recording bruising/injuries indicate position, colour, size, shape and time on a body map
- Action taken

In the exceptional case of the system failing, please complete paper copies and hand directly to the DSL, deputy DSL or safeguarding officer, adding the additional information detailed below:

- Child's name
- Name and signature of the person reporting an incident, including date and time

Please see appendices 3 and 4.

These basic details are vital to the information gathering process and do not constitute an investigation.

Storage of records

The DSL will ensure that records relating to concerns for the welfare or safety of children are kept separate from other school files and are stored securely. Information will be shared on a strictly 'need to know' basis and in line with child protection guidance.

Referrals to social services

Any staff member or visitor to the school will refer concerns to the DSL or deputies either directly or through SafeGuard. Where there is a risk of immediate harm, concerns will be referred via the Newham MASH portal and by telephoning on 0203373 4600. Less urgent concerns or requests for support will be referred via the online portal. Wherever possible, the school will share any safeguarding concerns, or an intention to refer a child to children's social care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from the Newham MASH team or the police in making decisions about when it is appropriate to share information with parents or carers.

Please see appendix 2.

If a child is referred, the DSL will ensure that the headteacher and other relevant staff are informed of this.

If after consultation with the DSL a member of staff feels that appropriate action is not being taken in respect of his or her concerns for a child, s/he should refer directly to social services. **The headteacher should be informed of this decision.**

Professional confidentiality

Confidentiality is an issue that needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils) or promise to keep a secret. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the DSL or deputies and may require further referral and subsequent investigation by appropriate authorities.

Information on individual child protection cases may be shared by the DSL or deputies with other relevant staff members. This will be on a 'need to know' basis only and where it is in the child's best interest to do so.

Records and information sharing

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst practitioners must have due regard for the Data Protection Act 2018 and the GDPR it is not a barrier to sharing information. Our school is confident of the processing conditions that allow us to store and share information for safeguarding purposes. This allows us to share information without consent, if it is not possible to gain consent or if to gain consent would place a child at risk.

Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern held about a child or children within our school, the status of such records and when these records should be shared with other agencies.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible on SafeGuard (or via the paper copy referral form (see Appendix

3), noting what was said or seen and using a body map to record if appropriate, (see Appendix 4) with the date, time and location. All records will be dated and signed, with the name printed and may include the action taken. This is then presented to the DSL or deputy, who will decide on the appropriate action and record it accordingly.

Any records related to child protection are kept in an individual electronic child protection file for that child, separate to the pupil file. All child protection records are stored securely and confidentially and will be retained for 25 years after the child's date of birth, or until they transfer to another school or educational setting. We acknowledge the guidance for transferring records as below.

Where a child transfers from our school to another school or educational setting, their child protection records will be forwarded or transferred electronically to the new educational setting with notice given to the receiving DSL. These will be sent confidentially and securely and marked for the attention of the receiving school's DSL who will need to provide a receipt, which is recommended to be an email. If paper files are sent they will be securely sealed and sent, under arrangements for immediate return if delivery to the receiving school's DSL/headteacher is not possible. A receipt is expected.

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

Transferring settings do not need to keep copies of child protection files, but if we do they are kept in accordance with data retention (and for the shortest practical time). In child protection cases where there may be ongoing involvement from transferring settings, for example, if any siblings still attend our setting, DSLs may wish to take copies of chronologies. SafeGuard has an option to link this information.

If a child who is subject of a child protection plan leaves our setting and we are unaware of the name of the child's new education placement, we will contact the child's key worker from Early Help or Children's Social Care to discuss how records should be transferred.

Where a child joins our school, we will request all child protection records from the previous educational setting. If none are received within the statutory time, we will renew the request and report this to the Education Safeguarding Officer.

Child Protection, Child-in-Need and Social Services Involvement Monitoring

The senior safeguarding team (SST) meet weekly to discuss open cases and will closely monitor children who are subject to a child protection plan, are children in need or a looked after.

In addition to this class teachers are required to complete a half termly monitoring sheet for vulnerable children.

The SST will also check-in regularly with children whose families are currently involved with social services, or have been recently. The purpose of the check-ins is to provide an opportunity

for children to discuss anything that is concerning them, without prompting, and to monitor aspects, such as hygiene, mood and behaviour.

Whistleblowing

Whistleblowing is defined as '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 members are made aware of the duty to raise concerns about the attitude or actions in line with the school's code of conduct and the whistleblowing guidance in Appendix 11. Further information on allegations against a member of staff can be found in Appendix 5.

Allegations about a member of the workforce

The aim of our school is to provide a safe and supportive environment that secures the wellbeing and best learning outcomes for children. All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the staff handbook. We do, however recognise that sometimes allegations of abuse are made and when they occur they are distressing and difficult for all. We also understand that some allegations are genuine and that there are adults who deliberately seek to harm or abuse children. Our school takes all possible steps to safeguard our children and ensure that the adults in our school are safe to work with children.

Supply staff, whilst not employed by the school are under the supervision, direction and control of the governing body when working in the school. If we receive an allegation about an individual that is not directly employed by the school for example, supply teachers we will discuss with the employer/agency whether it is appropriate to suspend the supply teacher or to redeploy them to another part of the school, whilst they carry out an investigation. We will usually take the lead in collecting the facts from children and other staff and work in partnership with the employer and LADO to manage the process.

We will always ensure that the procedures outlined in Chapter 7 of the London Child Protection Procedures are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO) by telephone 0203 373803 or email lado@newham.gov.uk

We will take all allegations seriously and respond accordingly if an allegation is made or information is received about any member of staff or volunteer who works with children and has done the following:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved in a way that indicates they may not be suitable to work with children;

Any concerns that involve allegations against a member of staff, this includes supply/agency staff and volunteers, should be referred immediately to the headteacher who will contact the Local Authority Designated Officer (LADO) to discuss and agree further action to be taken in respect of the child and the member of staff. In the absence of the headteacher please speak to the member of SLT who is deputising for her. If your concern is about the headteacher then you should immediately inform the Chair of Governors, Mrs Yolanda Musinguzi. The email address

can be found on the school system and the telephone number obtained from the main school office. (See Flow Chart Guidance Appendix 5) If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with this document's policy procedures, as set out in appendix 12. Further details can be found in our safer recruitment procedures and part four of KCSiE.

Any member of staff or volunteer who does not feel confident to raise concerns within the school should contact the LADO directly. Please refer to appendix 11 of this policy.

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

All staff need to be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. When in doubt – consult.

Safer recruitment

All shortlisting and interview panels will have at least one person qualified in safer recruitment practices as set out by the National College of School Leadership (NCSL) training. The current list of staff who have been trained in safer recruitment can be accessed through the school business manager or CPD lead.

- The school will obtain an enhanced Disclosure and Barring Service (DBS) check, which includes a Protection Of Children Act list/Barred check, in respect of all people who work directly with children or who are likely to have unsupervised access to them.
- The school will allow only people who have undergone an enhanced DBS check to have unsupervised contact with children on the premises.
- The school will keep records to demonstrate to Ofsted that the checks have been done, including the number and date of issue of the enhanced DBS check.
- The school will always seek to obtain two references from the previous employer(s) prior to interview. However, if attempts to obtain a second reference prove unsuccessful, or when the applicant's circumstances mean it is not possible to request a second reference, a candidate may still be appointed if the headteacher is completely satisfied with all other safeguarding checks.
- Schools are required, working with schools HR, to keep a record of all staff, including agency staff and appropriate volunteers, in the school under the Single Central Record. This indicates their DBS clearance in accordance with DfE requirements.
- The school must have effective systems in place to ensure that practitioners and others likely to have unsupervised access to the children (including those living or working on the premises) are suitable to do so.
- BPS follows the guidance document KCSiE (2023) and will also have regard to any requirements made under the Safeguarding Vulnerable Groups Act (2006).
- We will conduct background checks through an online search as part of due diligence when shortlisting candidates; undertake a risk assessment and use our professional judgement

when deciding whether to obtain an enhanced DBS certificate for any volunteer undertaking unregulated activity.

Code of conduct

All school staff should take care not to place themselves in a vulnerable position with relation to child protection. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Staff should only give gifts to children that have been provided by the school and handed out in line with reward procedures laid out in the behaviour policy.

Mobile phones

Staff members should not routinely carry or use their personal mobile phones when working directly with children. Use of phones for checking the time is acceptable in cases where access to a clock or computer screen is unavailable. Personal phones must never be used to take photos or videos of children nor should images be shared. The SLT and key staff may carry and use school phones.

Physical intervention

Physical intervention should only be used when the child is endangering him/herself/others or causing damage to the school's or other children's property. Such events should be recorded on SafeGuard. Staff should be aware of Brampton's safe touch policy and the school's behaviour policy. All physical interventions must be proportionate to the situation and in line with these policies.

Acceptable use policy

All staff are required to have read and sign the acceptable use policy for computing and should be aware of their responsibility to use the Internet appropriately in and out of school.

All school staff should work towards providing an environment and atmosphere for children to enable them to feel safe to talk. However, staff should never promise a child to keep certain information confidential. It must be explained that staff have certain duties to help keep that child safe, which may involve informing others.

Supervision and support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

All newly qualified teachers and classroom assistants have a mentor or co-ordinator with whom they can discuss concerns including the area of child protection.

The DSL can put staff and parents in touch with outside agencies for professional support if they so wish. Staff can also approach the Employee Assistance Programme (EAP) on 0800 882 4102.

Monitoring and review

All school personnel and governors will be given access to a copy of this policy and will have the opportunity to consider and discuss its contents prior to the approval of the Governing Body being formally sought.

This policy has been written in line with Pan London Child Protection Procedures, KCSiE 2023,

Working Together to safeguard Children 2018, The Prevent Duty 2015 and Newham Safeguarding Children Partnership to reflect the guidance and legislation issued in relation to safeguarding children and protecting their welfare within school.

This policy forms part of our school development plan and will be reviewed annually.

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

Key information

School	Brampton Primary School
DSL	Sarah Fordham
Designated teacher for Looked After Children and Deputy DSL	Alex Wedgbury
Deputy DSL	Marie Hardie
Deputy DSL	Olu Awelenje
Deputy DSL	Stefanie Reay
Safeguarding Officer	Abdul Khaleque Begum
Behaviour Lead	Sarah Fordham/Alex Wedgbury
Attendance lead	Sarah Fordham
Headteacher	Paven Kettory
Chair of Governors	Yolanda Musinguzi
CP/LAC/Prevent Governor	Susan Masters
Local Authority Designated Officer	Nick Pratt
Local Authority Prevent Lead	Ghaffar Hussain
Other staff trained in child protection	Patrick Stewart

Types of abuse and specific safeguarding issues

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

KCSiE (DfE, 2023).

The four main types of abuse referred to in KCSiE are as follows (for further details please see appendix 1):

- Physical
- Emotional
- Sexual
- Neglect

Our school is aware of the signs of abuse and neglect so we are able to identify children who may be in need of help or protection. Within those four types of abuse there are specific types of abuse that our school is alerted to.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children beyond the school environment. All staff, but especially the DSL and deputies should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familia harms (harms lying outside the family or its control) take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Predatory behaviour or a dismissive attitude towards sexual harassment may be prevalent online or feature in the children's lived experience of home, friendship groups or society at large but it is not indicative of respect for other pupils and therefore it is unacceptable at Brampton Primary School.

Child on child abuse

Our school may be the only stable, secure and safe place in the lives of children at risk of, or who have suffered harm. However, on occasions their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other children.

Child on child abuse can manifest itself in many ways. This may include bullying (including cyber bullying); on-line verbal abuse; gender-based abuse; verbal sexist abuse; unwanted, unthinking or coerced nude or semi-nude image sharing; or sexually harmful behaviour. We do not tolerate any bullying, abuse or harmful behaviour in school and will take swift action to intervene where this occurs.

We use the curriculum and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Staff are pro active and vigilant in recognising when a child may need to tell an adult of their choice about what is happening to them, will acknowledge how they feel and support them through the next steps of reporting to MASH, if that is what it takes to keep them safe. Our school staff understand the different gender issues that can be prevalent when dealing with child on child abuse. **Please see our anti-bullying and behaviour policies.**

Consensual image-sharing between older children of the same age may require a different response as it may not be abusive but the children still need to know that it is illegal and risky to maintain privacy as well as jeopardising future job searches, for example.

This is most likely to include, but not limited to the following:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm. Online activity which facilitates, threatens and/or encourages physical abuse.
- Sexual violence, such as rape, assault by penetration and sexual assault, this may include an online element which facilitates, threatens and/or encourages sexual violence

- Sexual harassment, such as comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting
- Initiation/hazing type violence and rituals, this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element

Children are capable of abusing their peers. Child on child will be fully investigated by the school and will never be tolerated or passed off as “banter” or “part of growing up”. Victims of child on child abuse will be fully protected and supported.

Children are encouraged to speak out, voice their concerns and understand that they have the right to say “No”. Year 6 pupils have received training as Peer Mediators and Play Leaders and are available daily to support the children in the playground.

Child on child abuse should be reported in line with policy procedures.

Sexual violence and harassment

Sexual violence and harassment can occur between children of any age individually or in groups. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, and in all likelihood will adversely affect their educational attainment. Our school takes all victims seriously and they will be offered the appropriate support.

Predatory behaviour or a dismissive attitude towards sexual harassment may be prevalent online or feature in the children’s lived experience of home, friendship groups or society at large, but it is not indicative of respect for other pupils and therefore it is unacceptable at our school.

An example of such harassment is ‘Upskirting’, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim and it is a criminal offence under the Voyeurism (Offences) Act 2019.

Our school culture of safeguarding ensures that the message that abusive behaviours are unacceptable is explicit through our curriculum, school environment and staff modelling appropriate language and respectful relationships. We do not accept that it is ‘just part of growing up’ or a joke. Our school manages such incidences in the same way by considering the need to undertake an immediate risk and needs assessment and as with any other child protection concern we will follow the same procedures. Pupils initiating such abuse or sexualised behaviour will be subject to an **AIM risk assessment** / Brook Traffic Lights (for EY and KS1) which will inform a safety plan for everyone involved, including themselves.

Children absent from education and missing from education (CME)

As part of our safeguarding role we ask parents and carers to provide a minimum of two contact details and we will regularly ask parents and carers to ensure that they are kept up to date.

All children, regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our school recognises that a child absent from education is a potential indicator of abuse or neglect and will follow the school procedures for unauthorised absence and for children missing education. Parents and carers should always inform us of the reason for any absence: call the school office on 0208 472 0830 or email info@brampton.newham.sch.uk. Where contact is not successfully made, a referral may be made to another appropriate agency (Newham Attendance Management Service (NAMS), Social Care or Police).

Our school will inform the local authority of any pupil who fails to attend school regularly or has been absent without school permission for a continuous period of 10 days or more in line with the requirements for children absent from education.

Contextual safeguarding

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school and can occur between children outside of the school environment. The DSL and all staff will consider whether children are at risk of abuse or exploitation in situations outside their families.

[Contextual Safeguarding](#) is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Our school staff need to engage with individuals and groups who do have influence over/within extra-familial contexts, and we recognise that risk assessment of, and intervention with, such sources of influence on our students are a critical part of our safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of our child protection systems in school in recognition of the fact that young people are vulnerable to abuse in a range of social contexts.

Contextual abuse takes different forms and children can be vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation and serious youth violence. If, as a school, we are concerned a child is being exploited in an extra-familial context, as previously outlined, we will follow the procedures set out in this document and consult or refer to the MASH, from where they are likely to be referred to the PCEHH.

Newham PCEHH – Preventing child exploitation and harm hub

The PCEHH is a weekly multi-disciplinary meeting chaired by the Director of Early Help and Children's Health. The PCEHH helps to identify and engage with children and young people who may be potentially at risk from any form of exploitation by responding to earlier 'critical moments' indicated via referrals from MASH. The PCEHH forms part of Newham's understanding and response to Child Sexual Exploitation (CSE), Missing, Criminal exploitation / gangs and county lines, serious youth violence (SYV), harmful sexual behaviour (HSB) and modern slavery in the borough.

It is well documented that focusing on prevention, early identification and intervention helps disrupt activity that might increase the probability of children and young people being exploited. Where there are low or emerging risks of child exploitation with no safeguarding concerns but heightened vulnerabilities, the child or young person is referred to the PCEHH for a multiagency

discussion to agree a co-ordinated package of support for the whole family. Involving all family members can be a key determinant in supporting children and young people to remain safe and achieve good outcomes.

The PCEHH sits within the Early Help service, which works with the whole family. This means that the PCEHH also considers both inter-familial as well as intra-familial concerns as part of a co-ordinated and contextual safeguarding approach. All cases must have followed existing child protection procedures prior to being discussed at the PCEHH, including strategy meeting/discussion where appropriate.

Child sexual exploitation (CSE) and child criminal exploitation (CCE) including county lines

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. This can happen to children and young people from any background or community. This power imbalance can also be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

In some cases, the abuse will be in exchange for something the child needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals, groups, males or females and children or adults. Abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve enforcement or enticement-based methods of compliance and may, or may not be accompanied by violence or threats of violence. Children can be exploited even when the activity appears consensual.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity; drug networks or gangs grooming and exploiting children and young people to carry drugs, weapons and money for them. Key to identifying potential involvement may be 'missing episodes' when the child may have been trafficked for the purpose of transporting drugs, weapons or money. Our school will consider a referral using the Newham pathways or a direct referral using the National Referral mechanism for human trafficking.

Serious violence

There are a number of indicators, which may signal that a child is at risk from, or involved with serious violent crime. These may include increased absence from school, a change in friendships, or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change of attitude or well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

Honour based abuse

So-called honour-based abuse (HBA) encompasses abuse committed to protect or preserving "honour". It often involves a wider network of family or community pressure and can involve

multiple perpetrators. This includes Female Genital Mutilation (FGM), forced marriage and such practices such as breast ironing.

Forced marriage

A forced marriage is one that is entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

Prevention of radicalisation

Children can be vulnerable to extremist ideology and radicalisation. Extremism covers views and actions that promote the following: violence against others, hatred towards others and undermining the rights of others. Protecting children from this risk is similar to protecting them from other forms of harm and abuse. The Counter-Terrorism and Security Act (HMG, 2015) Section 26 places a duty on schools in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the PREVENT duty.

It requires schools to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion;
- be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas and;
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to radicalisation and being drawn into terrorism. All staff understand how to identify those who may benefit from this support and are aware of relevant agencies to contact in circumstances where an individual demonstrates indicators of concern, as well as how to make a referral using the Newham referral pathways.

Mental health and wellbeing

All staff are aware that mental health can in some cases be an indicator that a child has or is suffering from or at risk of abuse. Staff are able to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health issue. Where there are mental health concerns about a child that is also a safeguarding concern, immediate action will be taken following the school child protection policy and the senior mental health lead, Sarah Fordham, will be informed.

Our school works to protect the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase a child's vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in a child's life, the more protective factors or supportive interventions are required to promote further growth and resilience. It is recognised

that some children in our school may be suffering from mental ill-health and are at risk of selfharm or suicide but may present in school as making good progress and achieving well. It is therefore vital that we work in partnership with parents and carers to support the mental health and well-being of our children. It is equally important that parents share any concerns about the well-being of their child with school, so that appropriate support and interventions can be identified and implemented in partnership.

Where there are concerns that a child may be self-harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a child discloses selfharm or found to be self-harming the DSL or mental health lead will take the time to establish any underlying concerns. The child will be supported to access services using the appropriate Newham referral pathways.

Domestic abuse

Domestic abuse is defined as *“any incident or pattern of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical, sexual; financial and emotional, coercive or controlling behaviour”*

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16).

Our school recognises that where there is domestic abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

Operation Encompass operates in London Borough of Newham and our school will use the information shared to ensure that our children are supported and kept safe.

Self-harm and suicide risk

Mental health is the concern of the whole community and we recognise that schools play a key part in this. Our school wants to develop and protect the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to promote further growth and resilience. It is recognised that young people that may be suffering from mental ill-health and are at risk of self-harm or suicide may present in school as making good progress and achieving well. It is therefore vital that we work in partnership with parents and carers to support the well-being of our pupils. It is equally important that parents share any concerns about the well-being of their child with school, so appropriate support and interventions can be identified and implemented.

Where there are concerns that a child or young person may be self-harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a child discloses self-harm or found to be self-harming the concern must be raised in line with policy procedures contained in this document.

E-safety

Children are encouraged to use the internet as much as possible but at all times in a safe way. Parents are asked to give permission for their children to use the internet on entry to school. Parents, pupils and staff must sign an appropriate usage form to ensure they understand the risks and sanctions relating to misuse of the system in and beyond school. The school will ensure that:

- Filtering software is in place to minimise access to any person accessing inappropriate sites or information.
- LGFL Home Protect is installed on all laptops that are handed out for home learning.
- Pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. Concerns should be logged on Safeguard before the end of the day, however any concerns of a significant nature must first be reported verbally to the DSL or deputy DSL before the child goes home.
- Every effort is made to encourage pupils not to give out their personal details, phone numbers, school, home address, computer password etc.
- Pupils adhere to school policy on mobile phones.
- Training is provided to pupils, staff and volunteers on e-safety matters where necessary.
- Issues classified within online safety are considerable, but can be categorised into four areas of risk:
 - **Content:** being exposed to illegal, inappropriate or harmful content for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - **Contact:** being subjected to harmful online interaction with other users, for example, peer on 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, for example, making, sending and receiving explicit images and online bullying.

- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Female genital mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and is a form of child abuse.

We know that if a teacher in the course of their work discovers that an act of FGM appears to have been carried out on a girl under the age of 18, staff must and will report this to the police. The DSL will advise/support staff in this position and work with appropriate colleagues and agencies to support the girl and liaise with the family. The Newham Attendance Management Service has produced guidance on FGM for staff dealing with families who announce that they are going abroad which is available here: [Newham Families Advice and Support | Female Genital Mutilation \(FGM\)](#).

What to look out for before FGM happens

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about:

- being taken 'home' to visit family □
a special occasion to 'become a
woman' □ an older female relative
visiting the UK.

She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

Families who practice FGM do not think of it as abuse.

Any concerns of a significant nature (abuse) must be reported immediately to the DSL or deputy DSLs via SafeGuard and certainly before the child is allowed to go home. If a concern arises after 3pm, the DSL or deputy DSLs must be informed in person.

As of October 2015, Section 75 of the Serious Crime Act places a legal duty upon all staff to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. All staff failing to report such cases will face disciplinary action.

Trafficking

Child trafficking is child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. They are often subject to multiple forms of exploitation.

Our admission process ensures that where trafficking is suspected, the relevant agencies are contacted and the details are reported.

Risk Assessment

Where children are at risk to others or themselves, individual pupil risk assessments will be employed. These will always be used in the best interests of the child and in consultation with parents/carers. Risk assessments will cover aspects, such as pupils who try to abscond from the care of the adults supporting them or those with SEN that have additional health needs.

In addition to procedures set out in the health and safety policy, all staff are required to remain vigilant during times where additional safeguarding risks could occur, e.g., on educational visits in crowded areas where the general public use of recording equipment, behaviour and/or language could pose a risk to children.

Inter-agency working

Our school will be pro-active and prioritise inter-agency working to contribute to safeguarding children. It is the responsibility of the DSL to ensure that the school is represented at and a report is submitted to any child protection conference or core group meeting for children on the school roll or previously known to them. Where possible and appropriate, any report will be shared in advance with the parent(s) and/or carer(s). Whoever represents the school will be fully briefed on any issues or concerns the school has and will be prepared to contribute to the discussions and planning at the meeting(s).

If a child is subject to a child protection or a child in need plan, the DSL will ensure the child is monitored regarding their school attendance, mental health and emotional well-being, academic progress, welfare and presentation. The DSL will ensure the school prioritises attendance at core group meetings and provide appropriate information to contribute to the plan at these meetings. Any concerns about the child protection plan and/or the child's welfare will be discussed and recorded at the core group meeting, unless waiting for the next meeting would place the child at further risk of significant harm. In this case the DSL will inform the child's key worker immediately and then record that they have done so and the actions agreed.

When we become aware that a child who is being, or is going to be, privately fostered our school has a duty under Section 10 of the Children Act 2004 to inform the Local Authority to ensure the appropriate safeguards are in place. The DSL (DSL) will make an appropriate referral using the Newham referral pathway.

Appendix 1

Categories of Child Abuse

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

Abuse is categorised under four headings: physical abuse, neglect, emotional abuse and sexual abuse. There are many signs which may indicate that a child is being abused. For example, overt and inappropriate sexual behaviour may be a specific sign that the child is being exposed to sexual abuse. However, a withdrawn and unhappy looking child could possibly be suffering from any of the four categories of abuse, but it may not be obvious as to what is the cause of the unhappiness. Staff should always be aware of children who show:

- Uncharacteristic aggression or temper tantrums
- An inability to make friends or relate to other children of the same age group.
- Bursts of tearfulness
- Frequent complaints of tummy aches and headaches.
- An air of depression.

Physical Abuse

Physical abuse is a form of abuse that 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.

Physical Signs of physical abuse could include:

- Obvious major injuries such as fractures, black eyes, cuts, and burns.
- Frequent “minor” injuries such as bruising, swelling, and redness, which may be evident in P.E.
- A child walking stiffly or holding themselves in an awkward way which might indicate an injury hidden beneath their clothing
- An unwillingness to change for P.E. □ Flinching at sudden movements
- An air of watchfulness and fear

Emotional Abuse

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

Signs of emotional abuse could include:

- Withdrawal and an air of detachment
- Depression
- Poor self esteem and lack of confidence
- A loss of appetite

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration e.g. rape or oral sex or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place on line, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue, please see details under the heading of Peer on Peer Abuse. Signs of sexual abuse could include:

- Child complaining of soreness / itching in the genital area
- Difficulty in walking or sitting
- Overt sexual behaviour or playing of a sexual nature
- Sexualised drawings
- Frequent soiling or wetting

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance misuse. Once the child is born, neglect may involve a parent or carer failing to provide adequate food, clothing, shelter, including exclusion from home or abandonment or emotional warmth. It may also be neglect if the parent or carer fails to protect the child from physical and emotional harm or danger, or if they have failed to ensure adequate supervision or access to appropriate medical care or treatment.

Signs of neglect could include:

- Constant hunger
- Thin or weak looking physique
- Untreated medical problems
- Poor personal hygiene and a dirty, unkempt appearance
- Lack of warm clothes in cold weather
- Constant tiredness
- A young child who comes to school and goes home unaccompanied
- A child who is left in the home without adult supervision
- A child who clings to adults and seeks affection
- Non Attendance

Complex and Organised Abuse

Complex and organised abuse may be defined as abuse involving one or more abusers and a number of related or non-related abused children and may take place in any setting. The adults concerned may be acting in concert to abuse children, sometimes acting in isolation or may be using an institutional framework or position of authority such as a teacher, coach, faith group leader or be in a celebrity position to access and recruit children for abuse.

Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will also be cases of children being abused via the use of electronic devices, such as mobile phones, computers, games consoles etc. which all access the internet and in particular social networking websites.

Although in most cases of complex and organised abuse the abuser(s) is an adult, it is also possible for children / young people to be the perpetrators of such harm, with or without adult abusers.

Taken from the London Safeguarding Children Board Protection Procedures, 5th Edition 2016.

Appendix 2

Situations where there should be a referral to Newham MASH Team

1. When it is suspected a child has suffered or is at risk of suffering significant harm either because disclosures or allegations have been made or from the presenting evidence. (Section 47)

- Physical abuse - when a parent or carer deliberately injures or induces illness in a child by hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm.
- Emotional abuse – when a child is persistently maltreated as to cause severe and persistent adverse effects to their emotional development. When you think a child is traumatised, injured or neglected as a result of domestic violence or persistent serious verbal threats.
- Sexual abuse – forcing or enticing a child to take part in sexual activities including both contact and non contact (pornographic, voyeuristic) abuse. When a girl under 13 is pregnant.
- Neglect – the persistent failure to meet a child’s basic physical and psychological needs which could cause significant harm to their health & development.

2. When there is a concern that a parent or carer poses a risk to children, including when someone has criminal convictions which suggest a risk to children or he/she poses a risk to a child of FGM, honour-based violence or forced marriage (Section 47)

- Children living in contact with adults with former schedule 1 offences or known to MAPPA /MARAC processes
- Children/unborn babies of parents who have previously had children removed or with issues such as substance misuse, mental health problems or disabilities which could place children at risk of significant harm.
- Children whose parents suffer from mental health problems where the child is the subject of parental delusions – even if the parent is not living with the child.

3. When a child is abandoned, home alone, lost or no-one has parental responsibility. (section 17 or 47)

- This includes vulnerable children left home alone and children whose parents are incapacitated through physical or mental ill health from caring for them.

4. When a child or young person is at risk of imminent family breakdown or breakdown has already occurred. (section 17 or 47)

- Children whose parents are experiencing a crisis or domestic violence dispute and are temporarily incapable of caring for them. When the parents’ drug and alcohol misuse, learning difficulties, physical and/or mental health are preventing them from caring for their children.
- Young people who are in crisis with their parents and who require professional intervention to prevent family breakdown.

5. When a child has a disability, serious or terminal illness. (Section 17) □

Including where a child has been in hospital for 3 months or more

- Where a child may need a package of services to support living at home

6. When a child may be privately fostered. (Section 17)

- Children who are looked after by someone other than a parent, step-parent, grandparent, aunt, uncle or sibling

7. When there is a suspicion that a child may be a 'child in need' which means they are unlikely to reach or maintain a satisfactory level of health or development without the provision of services. (Section 17)

- Children of disabled parents entitled to carers assessment.
- A child who is disabled.
- A child who is unlikely to maintain a reasonable level of health or development.
- A child whose health and development is likely to be significantly or further impaired without the provision of services.
- Children who are suspected of being trafficked

8. Young people remanded into Care because of criminal activity

Appendix 3

BRAMPTON PRIMARY SCHOOL

CONCERNS FORM

Record of incidents causing concern / telephone calls /contact with parents or other agencies

Full name of child

Class

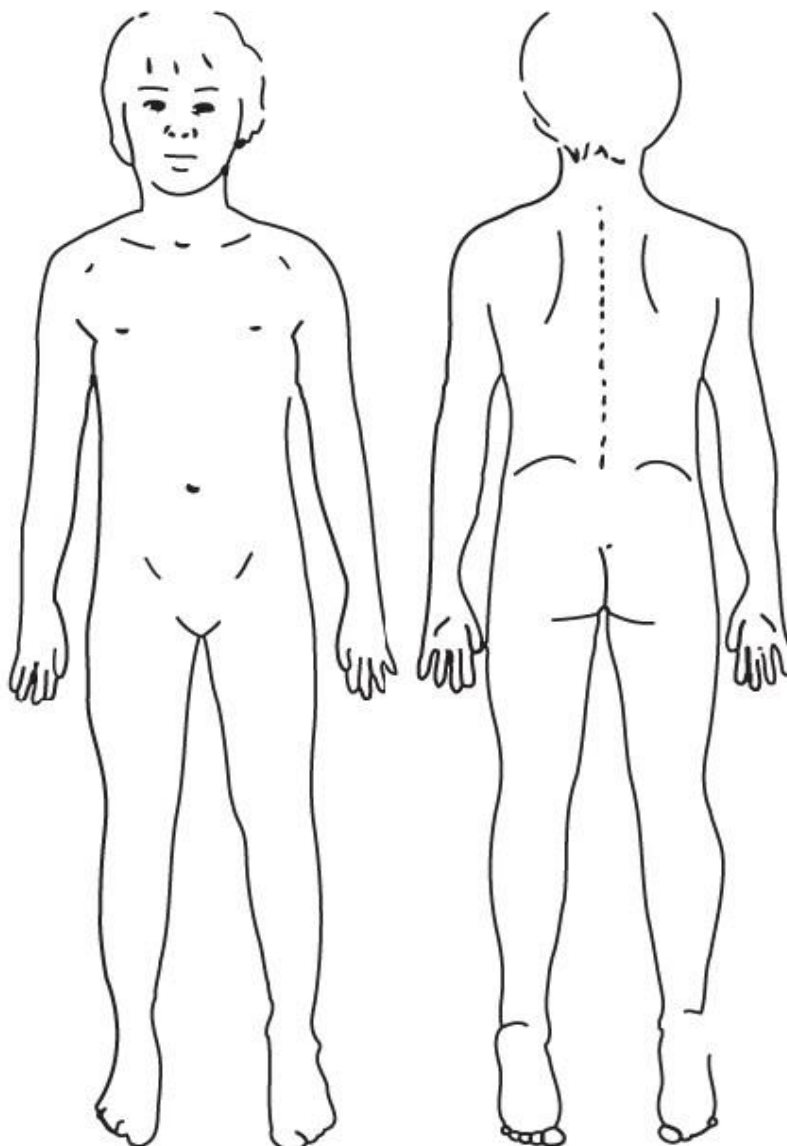
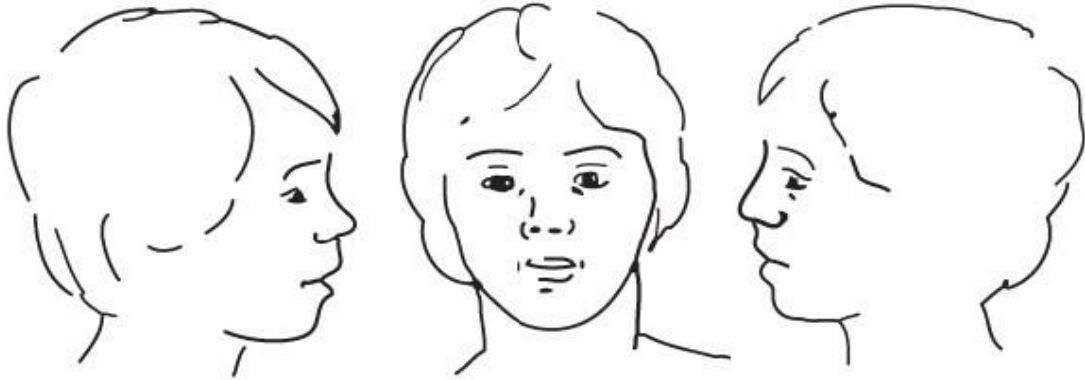
Date and time of reporting	INCIDENT / CONCERN
	<p>Signed:</p> <p>Print Name:</p> <p>Job Title:</p>

Each entry to be signed by person making entry, print name and job title. Hand to DSL or member of the Safeguarding Team.

**Appendix 4 Body
Map**

Indicate where the child has marks or bruises.

Sign, date and attach to the concerns form.



Appendix 5

ALLEGATIONS AGAINST

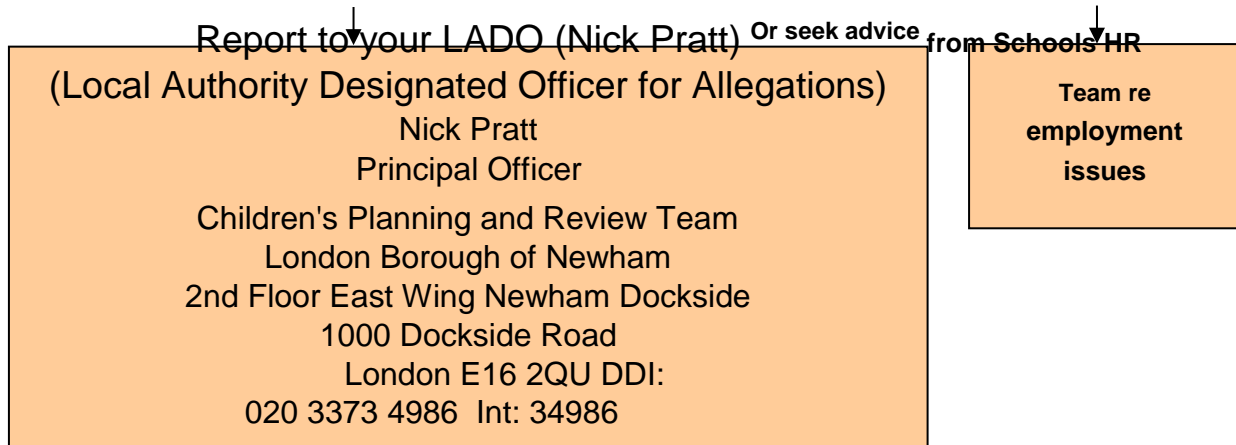
SCHOOL STAFF GUIDANCE FLOWCHART

If you become aware that a member of staff may have:

- behaved in a way that may have harmed a child or
- possibly committed a criminal offence against a child or
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children

The child and/or alleged abuser **SHOULD NOT** be questioned but a record made of what has been reported.

REPORT IMMEDIATELY TO YOUR HEADTEACHER, (or Chair of Governors if the allegation concerns the HT.)
In their absence, the Deputy, or Designated CP teacher who, unless there is evidence to prove the allegation is incorrect, will:



Your LADO will:

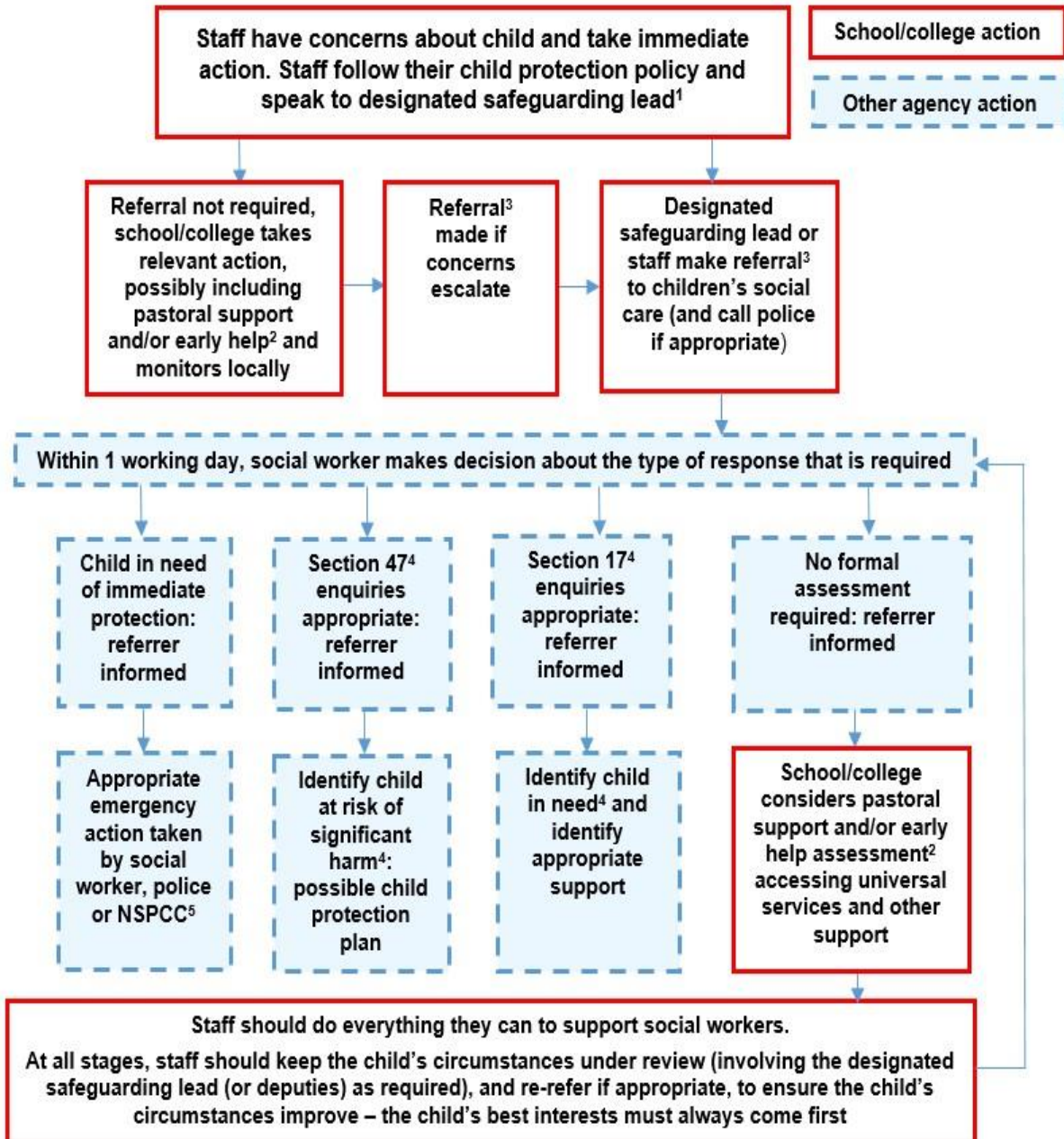
1. Consider the relevant facts and concerns re the adult and child, including any previous history.
2. Decide on next course of action –usually straight away, sometimes after consultation with others such as HR.

If the DfE procedures are indicated, the LADO will work with you an appropriate response (e.g. the school undertake enquiries)

If the DfE procedures ARE indicated, a Strategy meeting will normally be held- by phone or in person. Normally the Head, the LADO, HR and often Police are invited. Info is shared, risks to children considered and appropriate action agreed – e.g. S47 Children Act enquiries, school enquiries, disciplinary measures or (unusually) criminal proceedings. A record of the meeting will be made, and further meetings held every 4 weeks until a conclusion is agreed.

Appendix 6

ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD KCSiE – DfE 2020



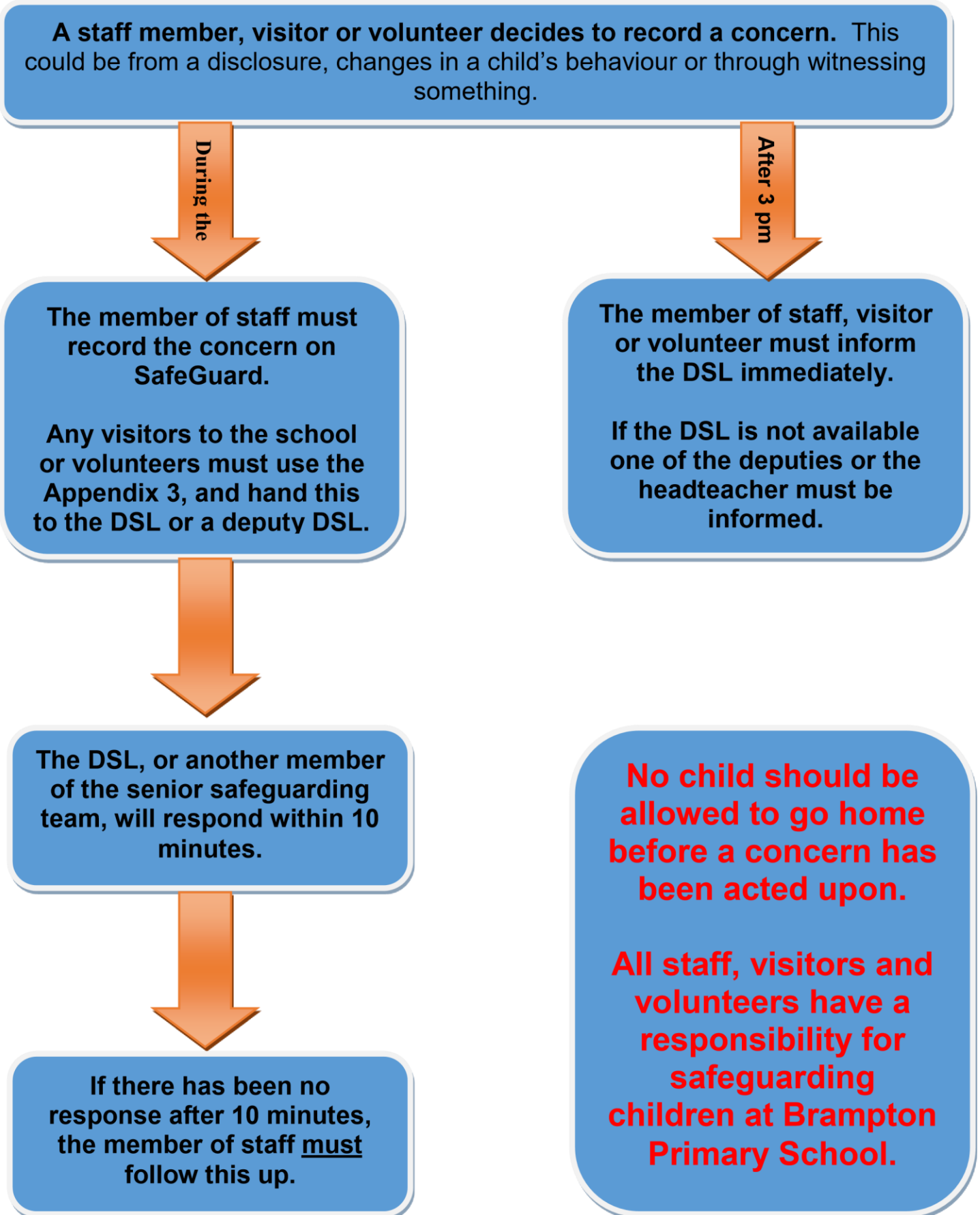
Appendix 7: Newham Joint Statement on Everyone's Invited

[Joint position statement on Everyone's invited | Newham Connect](#)

Appendix 8: Early Help Offer

http://www.newhamlscb.org.uk/wp-content/uploads/2018/02/04892-Pathways_A4-HIRES.pdf

Appendix 9 – Brampton’s Procedures for Staff Reporting Concerns



Appendix 10 – Statutory framework and content, plus the location of embedded safeguarding

Our school works in accordance to the following legislation and guidance:

[KCSiE - GOV.UK \(www.gov.uk\)](http://www.gov.uk) for 2023.

[Education inspection framework for September 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/90222/education-inspection-framework-for-september-2023.pdf)

London child protection procedures <http://www.londoncp.co.uk/>

[Working Together to Safeguard Children](#) (HMG, 2018)

Education Act 2002 Domestic Abuse Act 2021 Modern Slavery Act 2015 [What to do if you're worried a child is being abused](#) (HMG, 2015)

[Counter-Terrorism and Security Act \(HMG, 2015\)](#)

[The Prevent duty Departmental advice for schools and childcare providers \(DfE 2015\)](#)

[Prevent Duty Guidance for Further Education Establishments in England and Wales \(HMG 2015\)](#)

[Serious Crime Act 2015](#) (Home Office, 2015)

Sexual Offences Act (2003) Voyeurism (Offences) Act 2019

Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. (DfE July 2018)

<https://contextualsafeguarding.org.uk/>

Education (Pupil Registration) Regulations 2006

General Data Protection Regulations 2018 (GDPR)

[Searching, screening and confiscation](#) (DfE, 2018); Use

Of Force DfE current guidance.

Children Act 1989 Children Act 2004

Children and Social Work Act 2017

The Homelessness Reduction Act 2017

[Preventing and Tackling Bullying \(DfE, 2017\)](#),

Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)

Advice on Whistleblowing in Maintained Schools (DfE 2014)

<https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools>

[What are the latest rules around COVID-19 in schools, colleges, nurseries and other education settings? - The Education Hub \(blog.gov.uk\)](#) Current at July 2023.

Please note that guidance [Sexual violence and sexual harassment between children in schools and colleges](#) (DfE, 2017) has been incorporated throughout KCSiE 2023.

Appendix 11 – Whistleblowing Procedures

Definitions and Advice

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistle-blowing include (but are not limited to) the following:

- Criminal offences, such as fraud or corruption
- Pupils’ or staff health and safety being put in danger

- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure can be found by using the link. The free and confidential [advice line](#) can also be used.

Procedure for staff to raise a whistle-blowing concern

When to raise a concern

Staff should consider the examples in the section above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

Who to report to

Staff should report their concern to the headteacher. If the concern is about the headteacher, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of governors.

How to raise the concern

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

Procedure for responding to a whistle-blowing concern

Investigating the concern

When a concern is received by the headteacher – referred to from here as the ‘recipient’ – they will do the following:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative.
- Get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken.

- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the [headteacher and/or chair of trustees – amend to reflect your approach], if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police.
 - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the headteacher and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

Our recruitment policy refers to outcomes to protect staff when allegations against them have been found to be false or unfounded.

Escalating concerns

The school encourages staff to raise their concerns internally, but recognises that staff may feel the need to report concerns to an external body. In the first instance, concerns should be reported to the chair of governors. The LADO can also be consulted. Staff can contact the NSPCC whistleblowing helpline on: 0800 028 0285 or email: help@nspcc.org.uk. A list of additional prescribed bodies to whom staff can raise concerns with is included [here](#). The Protect advice line can also help staff when deciding whether to raise the concern to an external party.

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.

Appendix 12 – Low-level Concerns Procedure

Section 1: allegations that may meet the harms threshold

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

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

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

If we’re in any doubt as to whether a concern meets the harm threshold, we will consult 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.

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 investigation

- **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. [Add further information here about the support available to individuals in your context, such as who they can turn to for advice – trade union representatives, or a colleague, for example – and any school/local authority/trust arrangements for welfare counselling or medical advice]
- 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. Amend or add to this as applicable to reflect your own approach.

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

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

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

Definition of low-level concerns

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

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and** does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority. Examples of such behaviour could include, but are not limited to:

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

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

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

References

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

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