

SAFEGUARDING / CHILD PROTECTION POLICY

GRIFFIN PRIMARY SCHOOL



Designated Safeguarding Leads:

Angela Boyce (Outreach Lead)

Nicolle Atkin - SENDCo

Carly Doyle: Deputy - Mon, Tues, Thurs, Fri

Louise Black: Deputy - Mon, Tues, Wed, Fri

TEFAT Safeguarding Lead: Caroline Oliver

TEFAT DSLs: Caroline Oliver & Travis Latham

To be read alongside KCSiE update Sept '21 [KCSiE - Sept '21](#)

&

TEFAT Safeguarding Policy [TEFAT Safeguarding & CP Policy: 2021-2022](#)

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Griffin Academy

Griffin is part of a Federation with Greenside and part of the Elliot Foundation MAT - all local policies relating to Safeguarding pertain to the MAT's overall policy and guidance.

This policy may be subject to change in the light of Covid-19

IMPORTANT NOTICE

SAFEGUARDING AND PROMOTING THE WELFARE OF STUDENTS IS EVERYONE'S RESPONSIBILITY

Everyone who comes into contact with students and their families and carers has a role to play in safeguarding students. All professionals should ensure that their approach is student centred: this means considering at all times what is in the best interests of the student

Staff members must raise any safeguarding concerns with the appropriate safeguarding lead without delay. Concerns must be logged.

If a staff member has serious concerns about immediate risk to a student or that a student has suffered significant harm and continues to be at risk, they should contact Wandsworth Initial Point of Contact (IPOC) immediately - wherever possible with the support of the designated safeguarding lead or a deputy lead. If a student is in immediate danger the police should also be contacted.

Staff members should ensure they are prepared for the referral with clear details of their concern and the student's name, dob, address and contact details for parents / carers.

A referral in urgent circumstances can be made on the telephone but a completed Early Help Assessment form is required as soon as possible with key details included (even if additional background information is completed later) as s47 enquiries cannot be progressed with the police unless a referral has been received.

Referrals to IPOC can be made by:

Telephone: 020 8871 6622

e-mail: IPOC@wandsworth.gov.uk

The IPOC is in operation Monday – Friday 9.00am to 5.00pm. At other times please contact the Out of Hours Duty Service on 020 8871 6000.

INTRODUCTION

The Trust and staff of Griffin Primary School fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all students at the school. We recognise that all staff, including volunteers, have a full and active part to play in protecting students from harm.

Safeguarding and promoting the welfare of students is defined as:

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

We believe that our school should provide a caring, positive, safe and stimulating environment in which students can learn and which promotes the social, physical and emotional wellbeing of each individual student, and which takes a student-centred approach.

The school recognises its responsibilities and duties to report Child Protection concerns to the social work service within Children's Services and to assist Children's Services in Child Protection enquiries and in supporting Children in Need.

This policy is in line with the London Child Protection Procedures 2017 (5th edition amended October 2017), Working Together to Safeguard Children 2020, local guidance from the Wandsworth Safeguarding Children Partnership and Keeping Children Safe in Education 2021.

The school will raise Child Protection / Safeguarding concerns with parents / carers at the earliest appropriate opportunity, and work in partnership with them and other agencies to improve outcomes.

The school will ensure that all staff are provided with the appropriate training in Child Protection and Safeguarding issues, including Early Help processes, as recommended in the guidance. In particular the Designated Safeguarding Leads (DSL) will have their role explicitly stated in their job descriptions and will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively. Designated leads will also ensure that all staff are provided with Part One of Keeping Children Safe in Education 2020 guidance and assisted to understand and discharge their roles and responsibilities as set out in this guidance.

Project Tearose / Encompass is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Schools. Our school has signed up to this agreement.

If police have responded to a domestic incident and there are students in the family, the officers working on project Tearose / Encompass will disclose this incident to the student's school the following morning (Monday to Friday). The actual content of the information shared is kept to the minimum, i.e. outlining the offence, but without specific details.

At each school the information is shared securely with the Designated Safeguarding Leads, and is treated as sensitive and confidential.

Research shows that students who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the student, and so that support can be offered to the student if necessary. The school is part of the network available to support the family and students.

All staff are required to read this policy carefully and to be aware of their role in these processes.

All new staff will have the opportunity to discuss safeguarding requirements and this policy during their induction process. Safeguarding arrangements are explained to new staff members as part of their induction

AIMS

- To raise awareness of all school staff of the need to safeguard all students and of their responsibilities in identifying and reporting possible cases of abuse
- To emphasise the need for good communication between all members of staff in matters relating to student protection
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse

- To provide a systematic means of monitoring students known or thought to be at risk of significant harm or where there are ongoing concerns
- To work openly and in partnership with parents in relation to student protection concerns
- To support all students' development in ways that will foster security, confidence and independence
- To promote safe practice and challenge poor and unsafe practice
- To further develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of students
- To ensure that all vulnerable students, including those who need a social worker and those requiring mental health support are provided with appropriate help in school to ensure their needs are identified and responded to effectively
- To ensure that all adults working within our school have been checked as to their suitability to work with students, in line with current guidance
- To integrate opportunities into the curriculum for students to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages
- To take account of and inform policy in related areas, such as anti-bullying; online safety; discipline and behaviour; health and safety; student on student abuse; missing students; student sexual exploitation; FGM; violence in the name of honour; serious youth violence, including knife crime; anti-radicalisation; positive handling and physical intervention procedures; procedures for dealing with allegations against staff and recruitment practice.
- To comply with the core responsibilities expected of the school as a relevant agency to the multi-agency safeguarding arrangements in Wandsworth, as set out in the Wandsworth Safeguarding Children Partnership published arrangements

DEFINITIONS

- Child abuse is taken to refer to any student of under 18 years who, through the actions of adults (with a caring role for that student) or their failure to act, has suffered or is at risk of suffering significant 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 (eg via the internet). They may be abused by adults or another student or students
- Behaviours such as alcohol and substance misuse, truancy and sexting put students at risk or in danger and safeguarding issues can manifest themselves via peer-on-peer abuse, including cyber-bullying and gender-based violence / sexual assaults
- Abuse is broadly divided into four categories:- Neglect, Physical Injury, Sexual Abuse and Emotional Abuse. Brief definitions are given below. Guidance for recognising the indicators of possible abuse are attached as Appendix 3.
- Neglect is the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a student from physical harm or danger or the failure to ensure access to appropriate medical care and treatment. It may also include neglect of, or unresponsiveness to a student's basic emotional needs.
- Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a student. Physical harm may also be caused

when a parent or carer feigns the symptoms of, or deliberately causes ill health to a student who they are looking after. This situation is now known as illness fabricated or induced by carer (previously Munchausen Syndrome by Proxy).

- Sexual abuse involves forcing or enticing a student or a young person to take part in sexual activities, whether or not the student is aware of what is happening. The activities may involve physical contact, including penetrative (e.g rape) or non-penetrative acts. They may include non-contact activities, such as involving students in looking at pornographic material or watching sexual activities or encouraging students to behave in sexually inappropriate ways.
- Emotional abuse is the persistent ill treatment of a student, such as to cause severe and persistent adverse effects on the student's emotional development. It may involve conveying to students that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person. It may feature age or developmentally inappropriate expectations being imposed on students. It may involve causing students frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of ill treatment of a student although it may occur alone.

It is important to recognise that many students will be living (or may have lived) in families where Domestic Abuse is a factor, and that these situations have a harmful impact on students emotionally, as well as placing them at risk of physical harm. The definition of Domestic abuse is *any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or 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 harm.*

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

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

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a student into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a student or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the student or young person. Victims of FGM are likely to come from a community that is known to

practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

FGM is illegal in the UK and there is a mandatory duty on schools to report cases of FGM to the police.

Honour Based Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a student being at risk of HBA, or already having suffered HBA.

Children Who Go Missing From Home or Care are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- No means of support or legitimate income – leading to high risk activities
- Involvement in criminal activities
- Victim of Abuse
- Victim of crime, for example through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health
- Missing out on schooling and education
- Increased vulnerability

Longer-term risks include:

- Long-term drug dependency / alcohol dependency
- Crime
- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health.

Children Missing From Education: all students, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A student going missing from education, or not attending it regularly, is a potential indicator of abuse or neglect. We will follow the required procedures for unauthorised absence and for dealing with students who go missing from education, including appropriate notification to the Local Authority. We will also ensure staff are alert to the potential risks of poor or non attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as travelling to war zones, FGM and forced marriage.

Prevent: all schools must have due regard to the need to prevent students from being drawn into extremism, terrorism or being radicalised. We will ensure that staff are provided with appropriate training and information to enable them to assess the risk of students being drawn into extremist ideas that are part of terrorist ideology and identify any student who may be at risk and how to support them. We will also ensure that students are safe from terrorist and extremist material when accessing the internet in school. Concerns will be discussed with the student’s parents whenever possible and with the Local Authority Prevent co-ordinator and referrals made to the Channel programme when appropriate. We understand our responsibilities as set out in the Prevent Duty and legislation and will ensure these are adhered to.

KEY PRINCIPLES

- We believe that all students have a right to be protected from harm and /or abuse
- We recognise that abuse and neglect are complex issues and rarely stand alone events and therefore require a culture of vigilance, professional curiosity and respectful challenge and effective recording and monitoring systems
- We recognise that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be taken into account depending on the student's cultural and social background when dealing with CP and safeguarding issues. However we also recognise that the needs of the student are paramount and any concerns will be referred on appropriately whatever the family background of the student concerned.
- We recognise that because of the day to day contact with students school staff are extremely well placed to observe outward signs of abuse
- We recognise that a student who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel helpless and humiliated and may feel self blame.
- We recognise that the school may provide the only stability in the lives of students who have been abused or are at risk of harm.
- We accept that research shows that the behaviour of a student in these circumstances may range from that which is perceived as normal to that which is overtly aggressive, disturbed or withdrawn.
- We know that it is important that students feel secure, are encouraged to talk and are sensitively listened to, and that students know that there are adults in school whom they can approach if they are worried or unhappy.
- We acknowledge that (although all designated / key staff have the skills and experience to respond to a variety of situations and issues) there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, a student can be spoken to by a same sex member of staff (who has received enhanced training) if this is felt to be appropriate.
- We adhere to the principles of working in partnership with those who hold parental responsibility for each student.
- The prime concern at all times must be the welfare and safety of the student. Where there is a conflict between the needs of the student and the parent/carer, the interests of the student must be paramount.
- The ethos of the school supports open practice, good communication and a safe culture in which students can thrive and learn.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately
- All staff are aware of the relevant data protection principles (under DPA 2018 and the GDPR), but are also clear that where there is the need to safeguard or promote the welfare of a student, relevant and proportionate information must be shared.

PROCEDURES

Logging a concern

Our Designated Safeguarding Lead (DSL) is Angela Boyce (Outreach Lead).

Our Deputy Safeguarding Leads are Nicolle Atkin (F/T) Carly Doyle & Louise Black (P/T)

If all of the above are unavailable KBS can be contacted at any time, or the DSL Leads at Greenside or the Trust.

Please read and adhere to our Child Protection Policy at all times. Child Protection issues must be reported immediately. If you have any concerns regarding any aspect of a student's well-being it is your duty and responsibility to share this by alerting a DSL (and following your conversation with a written report) as soon as possible. Any safeguarding concerns can be emailed to safe@griffingprimary.org with URGENT in the subject line and this will then reach the Safeguarding Team.

Teachers also use the programme 'My Concern' where all safeguarding concerns should be logged as soon as possible. The designated safeguarding leads will receive notification and take action when necessary.

Our school procedures are in line with those agreed by TEFAT, the Wandsworth Safeguarding Children Partnership (WSCP), the LA and the Secretary of State (see Appendix 1 for details of relevant procedural and guidance documents)

We will therefore ensure that

- We have a designated member of staff who has received appropriate training and support for this role, in accordance with mandatory requirements.
- We have a minimum of one additional member of staff who will act in the absence of the designated member of staff and has also received appropriate training for this role.
- We will ensure designated staff attend training and receive relevant updates every year and all staff are provided with training at induction and thereafter on a regular basis including safeguarding briefings and updates at least annually
- Induction and refresher training for staff members will include the school's behaviour policy and procedures for students missing education as well as the staff code of conduct and this CP / safeguarding policy
- The roles of the designated safeguarding leads are explicit in their job descriptions
- staff and volunteers know the name of the designated safeguarding lead (DSL) and their role and what the back up arrangements are if the DSL is unavailable.
- We will ensure that staff have access to a DSL at all times during the school day so that they can report concerns and seek advice / guidance if required
- All staff are familiar with the school's Safeguarding and Child Protection Policy as well as the staff code of conduct and that these issues are included in the induction for each new staff member
- All staff develop their understanding of signs and indicators of abuse and report any concerns to the designated lead but know that they can also refer direct to Children's Services (Social Services) if needed
- We will ensure that all staff are aware that it is important to identify any concerns about students at as early a stage as possible so that their needs can be identified and monitored and appropriate support put in place
- We recognise that there is a variety of expertise within the staff team and will provide opportunities for staff to contribute to and shape safeguarding arrangements and policy
- We are aware of risks to students online and will ensure students are safeguarded in school from potentially harmful and inappropriate online material through appropriate filtering and monitoring systems and educated in how to be as safe as possible online
- When considering referrals to support agencies the school will act in accordance with WSCP Thresholds for Intervention guidance, which is consistent with the London-wide Continuum of Need thresholds
- All staff are aware that they should raise any concerns about colleagues or other adults with the DSL
- All staff know how to respond appropriately to a student who discloses abuse.
- All parents / carers are made aware of the responsibilities of staff members with regard to Child Protection procedures, (for example in information provided to all parents and on the website).
- We will request a minimum of three emergency contact numbers for each student as we acknowledge that this is a protective measure for students to enable swift contact with families when necessary
- We will refer any student believed to have suffered or to be likely to suffer significant harm to Children's Social care without delay, and will follow up any such referral in writing as quickly as possible (on the same day)
- We will ensure the immediate safety of any student felt to be at serious risk by taking appropriate action and by involving other relevant agencies as necessary

- We will carry out risk assessments where required and ensure any assessed risk is appropriately managed and key staff have been provided with the relevant information and with strategies to support safety and wellbeing of students and staff members
- We will develop effective links with relevant agencies and co-operate as required with their enquiries regarding student protection matters, including attendance at CP case conferences wherever possible and providing reports as a matter of course (model format attached as appendix 2). We will contribute to multi – agency assessments of students’s needs where appropriate and work in a fully integrated way with other relevant services as appropriate.
- If a student’s situation does not appear to be improving, the school will take responsibility for finding out what is happening and keep pressing for action to be taken
- Written records are kept of all concerns, whether or not there is a need to refer the matter immediately, and that these records are kept securely, separate from the main student file, and in locked locations or securely using an appropriate computerised system.
- All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing.
- All staff members are made aware of the record keeping requirements and how they are expected to record any safeguarding concerns.
- The student’s social worker is notified of any student subject to a Child Protection Plan who is absent from school without explanation for more than 2 days
- Any new concern or relevant information about a student subject to a Child Protection Plan will be passed to the student’s allocated social worker without delay
- If a student subject to a Child Protection Plan leaves the school, records will be transferred to the new school without delay and in a secure manner which ensures acknowledgement of receipt of the information. The student’s social worker will also be informed of the change
- If school staff are unsure how to proceed in a potential Child Protection situation, or require advice, this will be appropriately sought via the Education Safeguarding Officer , a duty manager in IPOC / MASH or directly from the Safeguarding Standards Service. (useful numbers listed in Appendix 5)

EARLY INTERVENTION AND HELP

- All staff recognise that when a student or family may be experiencing difficulties, support is most effective if it is provided at as early a stage as possible
- This involves identifying emerging problems; liaising with the designated lead or other relevant colleagues; sharing information with other professionals to support early identification and acting as lead professional in undertaking an Early Help Assessment (EHA)
- Any concerns will be identified by staff, discussed with relevant colleagues and parents and support put in place. Effective monitoring systems will be used to assess the effectiveness of interventions and outcomes.
- Any student may benefit from Early Help but school staff will be particularly alert to the potential need for support for any student who
 - 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 in to 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 misusing drugs or alcohol themselves;
 - Is at risk of modern slavery, trafficking or exploitation;
 - is in a family circumstance presenting challenges for the student, such as substance abuse, adult mental health problems or domestic abuse;
 - has returned home to their family from care;
 - is showing early signs of abuse and/or neglect;
 - is at risk of being radicalised or exploited;

➤ is a privately fostered student.

- If appropriate support is not available within school's own resources, an Early Help Assessment will be completed to identify the student's needs and enable additional support to be sought from other agencies
- A Team Around the Child will be established where appropriate and a Lead Professional identified
- If Early Help is in place the situation will be kept under constant review and consideration given to additional referrals (eg to social care) if the student's situation does not appear to be improving
- Early Help Assessments will follow the Signs of Safety and Wellbeing model

CURRICULUM INPUT AND ONLINE SAFETY

- We ensure that students are taught about safeguarding, including how to keep themselves safe online, through teaching and learning opportunities within our curriculum. We will ensure that the curriculum includes input about safe relationships and personal resilience, sexual education and health education and is in line with legislative changes in our SMSC/ RHE policy & practice.
- In planning curriculum input in relation to online safety we will ensure materials are differentiated to take account of the different ages, levels of understanding and vulnerabilities of our students so that all students are enabled to access this input effectively.
- We acknowledge that as well as providing a variety of positive opportunities, the use of technology has become a significant component of many safeguarding issues, and can provide the platform that facilitates exploitation of students and young people. The breadth of issues classified within online safety are considerable but can be categorised into four areas of risk:

CONTENT: being exposed to illegal, inappropriate or harmful material

CONTACT: being subjected to harmful online interaction with other users

CONDUCT: personal online behaviour that increases the likelihood of, or causes harm, such as the sending of explicit images or online bullying

COMMERCE: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

STUDENTS WITH SPECIAL EDUCATIONAL NEEDS / DISABILITIES

- We recognise that students with SEN / Disabilities may be especially vulnerable to abuse and expect staff to take extra care to interpret apparent signs of abuse or neglect.
- We will ensure assumptions are not made that indicators of abuse (such as behaviour, mood and injury) relate to the student's disability without further exploration
- We will provide a school environment in which all students, including those with SEND, can feel confident and able to discuss their concerns, providing support with communication difficulties where needed, and differentiating appropriately
- We recognise that students with SEN and disabilities are at higher risk of peer group isolation and may suffer a disproportionate impact from bullying and will provide proactive support to ameliorate these risks .
- The designated member of staff will work with the SENDCo, where necessary, to ensure that the needs of SEN students in relation to student protection issues are responded to appropriately (eg for a student with particular communication needs).

CONTEXTUAL SAFEGUARDING

- We understand that safeguarding incidents and/or behaviours can be associated with factors outside Griffin and/or can occur between students outside of Griffin or within.
- All staff, but especially the designated safeguarding lead (or deputy), understand these extra familial issues and will ensure that the context within which such incidents and/or behaviours occur is considered, including whether the student is at risk of abuse or exploitation in situations outside their families.
- This is known as contextual safeguarding, which simply means assessments of students should consider whether wider environmental factors and influences are present in a student's life that are a threat or pose a risk to their safety and/or welfare.

- We understand that extra-familial harms take a variety of forms and students can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence
- The school will contribute to the assessments and mapping processes, taking these extra familial risks into account and sharing relevant information with social workers and other professionals in order to enable all such factors to be taken into account when risk to students is being assessed.
- This will allow any assessment to consider all the available evidence and the full context of any abuse.

LOOKED AFTER CHILDREN, CARE LEAVERS and OTHER CHILDREN LIVING AWAY FROM HOME

- The school will ensure there is a designated teacher (Nicolle Atkin) whose role is to promote the educational achievement of students who are looked after, and that the identified person has received appropriate training as defined in the Children and Young Persons Act 2008.
- We will ensure that appropriate staff have the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her, as well as the details of the student's social worker and the virtual school head in the LA.
- School will work with the virtual school head to discuss how the LAC funding can be best used to support the progress of Looked After Children in the school.
- The school recognises that students who were previously Looked After; Care Leavers and other students living away from home are also additionally vulnerable and may continue to require support at a higher level

MENTAL HEALTH AND BEHAVIOUR

- In order to help our students succeed, we recognise that the school plays an important role in supporting them to be resilient and mentally healthy
- We will ensure that students and their families are enabled to participate as fully as possible in decisions and are provided with information and support
- We recognise that some students are more at risk of developing mental health problems than others. These risks can relate to the student, their family or to community and life events and may include students who have experienced abuse.
- Risk factors are cumulative, and students exposed to multiple risks are more likely to develop behavioural or mental health problems
- Where severe problems occur we will ensure that appropriate referrals are made (with consent) to specialist services (eg CAMHS)
- If we have a mental health concern about a student that is also a safeguarding concern, immediate action will be taken in line with our policy

COMMUNICATION WITH PARENTS / CARERS

- We will ensure that all parents are informed that the school has a student protection / safeguarding policy and is required to follow WSCP guidelines and other statutory documents in respect of reporting suspected abuse to Children's Social Care.
- Students and parents/ carers will be made aware of how the school's safeguarding system works and with whom they can discuss any concerns.
- Information will also be made available about any local and national telephone helplines.
- In individual cases, parents/ carers will be notified of the schools' concerns at the earliest appropriate opportunity.

CONFIDENTIALITY

- We recognise that matters related to Child Protection are of a confidential nature. The designated member of staff and / or headteacher will therefore share detailed information about a student with other staff members on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with the designated lead and with other relevant agencies where necessary to safeguard and promote the welfare of students.
- All staff must be aware that they cannot promise a student that they will keep certain information secret.

SUPPORT FOR STAFF

- We recognise that staff working in the school who have been dealing with student protection issues may find the situation stressful or upsetting
- We will ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have
- We will ensure that formal supervision is provided for staff working in Early Years and foundation stage as required
- We will consider what arrangements can be made to provide supervision for designated leads and any other staff members as appropriate

ALLEGATIONS AGAINST STAFF OR VOLUNTEERS

- We recognise that there will be occasions when a student at the school, or a parent or another person may make an allegation against a member of staff (including supply or agency staff or contracted staff) or volunteer. The term allegations refers to concerns reported or raised that might indicate a person has caused harm to a student, acted in a way that created potential serious risk to a student or would pose a risk of harm if they continue to work in regular or close contact with students in their present position, or in any capacity.
- The majority of allegations against staff and volunteers relate to their behaviour in the workplace. However some concerns may relate to their personal life or the care of their own students. In some cases there may have been an allegation of abuse against someone closely associated to them and this person may pose a risk of harm to the students the staff member of volunteer is responsible for.
- We expect any member of staff or volunteer who is concerned about the behaviour or presentation of a colleague, or sees an incident which concerns them, to discuss this as soon as possible with the DSL or Executive Head. If necessary the whistleblowing procedures can be used but an ethos should be encouraged which enables open discussion, and allows staff or volunteers to feel able to discuss any concerns without fear of reprisal.
- This will also involve a discussion with the LA and Authority Designated Officer (LADO) where appropriate within 24 hours of the concern / allegation becoming known.
- The criteria for making a referral to The LADO is that an individual may have:
 - behaved in a way that has, or may have, harmed a student;
 - possibly committed a criminal offence against or related to a student; or
 - behaved towards a student or students in a way that indicates he or she would pose a risk of harm to students.
 - behaved or may have behaved in a way that indicates they may not be suitable to work with students
- The LADO also offers a consultation service, which supports those investigating an allegation or concern and provides expert advice. Every consultation with the LADO is followed up in writing to reflect the advice and guidance given. This means the school will have a clear record of their

correspondence with the LADO, which provides important evidence (for example if they are inspected by OFSTED). It also holds the LADO accountable for the advice given.

- All staff are expected to recognise the need for absolute confidentiality in these situations.

SAFER RECRUITMENT

- The school will ensure that it operates a safe recruitment policy to ensure that all those working in the school, in either a paid or unpaid capacity are suitable to do so as far as can be reasonably ascertained.
- Leadership Group and any other staff involved in selection procedures will attend Safer Recruitment training
- Appropriate checks (ie enhanced DBS checks and checks against the barred list) will be carried out on all potential employees and all references will be taken up and verified.
- The school will carry out risk assessments for any volunteers to determine if they need to undertake an enhanced DBS check or barred list check.
- The school will ensure it is following the most recent guidance in respect of these issues, including taking account of the definition of regulated activity
- The school will ensure compliance with Section 3 of Keeping Children Safe in Education 2020 (updated Sept '21) in relation to recruitment, recruitment checks, obtaining of references, s128 checks (where applicable) and information that must be included on the single central record (SCR)
- Interview panels will follow recommendations from the HR section in relation to practice. One member of each interview panel must have completed Safer Recruitment training
- At interview, candidates will be asked to account for any gaps in their employment history.

RESPONSIBLE BODY

- The Trust will ensure that they comply with their duties under legislation. They will ensure that the policies, procedures and training in their schools are effective and comply with the law at all times and take into account the procedures and practice of the WSCP and Keeping Children Safe in Education 2021
- The Trust will ensure that a member of Trust (Caroline Oliver - Director of Safeguarding, DSL for TEFAT) has been nominated to liaise with the LA and/or partner agencies on issues of Child Protection and in the event of an allegation of abuse being made against the Executive Head.
- The Executive Head will liaise in the event of an allegation being made against a member of LG.
- The Trust will remedy any deficiencies or weaknesses in regard to Child Protection arrangements that are brought to its attention without delay

POSITIVE HANDLING and PHYSICAL INTERVENTION

- Our policy on positive handling and physical intervention by staff is set out in a separate document and acknowledges that staff should only use physical intervention in particular circumstances, and that even when necessary the minimum force should be used to prevent harm to the student or another student or adult.
- Positive handling training will be provided by a BILD accredited trainer for staff members, as required, to ensure best practice at all times.
- Risk assessments will be carried out where individual students have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/ carers.
- These plans are intended to minimise the likelihood of challenging behaviour and that if and when it does occur there is less use of physical interventions and other restrictive methods
- Physical intervention which causes injury or severe distress to a student may have to be considered under student protection or disciplinary procedures.

SPECIFIC SAFEGUARDING ISSUES

- Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary
- The DSL will attend relevant training and cascade information, or where relevant organise additional briefings or training input for staff. to ensure that staff are aware of issues such as those listed below, understand the indicators and recognise the complexities of these issues for young people
 - Child Sexual Exploitation
 - Female Genital Mutilation
 - Radicalisation
 - Illness Fabricated and Induced
 - Domestic Abuse
 - Violence in the name of Honour
 - Children missing education
 - Students and the court system
 - Students with family members in prison
 - County lines
 - Domestic abuse
 - Homelessness
 - Sexual violence and sexual harassment
 - Peer on peer abuse, including knife crime and serious youth violence
 - Sexual violence and sexual harassment, including upskirting

Please see Sept '21 updates.

ANTI - RADICALISATION

The school supports the Prevent Strategy, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions.

Extremism is defined as the holding of extreme political or religious views which may deny rights to any group or individual.

All staff members are aware of these issues and relevant staff have attended training.

The school works within the curriculum and SMSC/ RHE to promote tolerance and respect for diverse views, while challenging prejudice of any kind. We are an inclusive school which values citizenship and a sense of belonging. students are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.

As with all matters pertaining to the maintenance of a safeguarding culture within the school, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay.

If any concerns arise, or are disclosed by a student, they will be responded to following normal safeguarding processes and advice would be sought from colleagues in LA (either Prevent co-ordinator or safeguarding services) if necessary.

STUDENTS WHO ABUSE OTHER STUDENTS

We recognise that students are capable of abusing their peers. As a school we work to minimise the risk of peer on peer abuse and will investigate and deal with any allegations robustly. Where needed risk assessments will be carried out and strategies put in place to protect the student who has suffered abuse

and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion.

It is important to be conscious that any student who is engaging in abusive behaviour towards others may have been subject to abuse from other students or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse / activity; physical harm; emotional abuse and / or verbal abuse.

Students who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

In such incidences, the school will follow guidance issued in relation to students who abuse others and local procedures and make referrals to social care, CAMHS and / or police as appropriate. This guidance is attached as (Appendix 6)

Instances of sexual violence and sexual harassment will be taken seriously and responded to robustly. The school will adhere to guidance in section 5 of Keeping Children Safe in Education and follow procedures (as detailed in Appendix 7) - Updated Sept '21

All staff will be made aware of indicators which may signal that students are at risk from, or involved in, serious violent crime. They will be provided training and information about the associated risks and the measures in place to manage these, in line with Home Office guidance "Preventing youth violence and gang involvement" and the OFSTED report "Safeguarding students and young people from knife crime" (as detailed in Appendix 12).

OTHER RELATED POLICIES

- This policy has clear links to other policies in our school, in particular to any policies concerned with the protection of all students in the school from various kinds of harm. Please see policy folder: [Gf.Policies: 2021-2022](#)

Appendix 1

London Child Protection Procedures, 5th edition
available electronically via Wandsworth Safeguarding Board website www.wscb.org.uk and London SCB website – www.londonscb.gov.uk

London Safeguarding Children Board supplementary procedures
These provide detailed information related to specific safeguarding issues. They are available via the London SCB website (as above).

Keeping Children Safe in Education
DfES statutory guidance issued Sept 2021
Keeping Children Safe in Education 2021

[Keeping children safe in education 2021](https://www.gov.uk/government/publications/keeping-children-safe-in-education-2021)

Or via www.gov.uk/government/publications

This guidance contains links to guidance and advice about many of the key specific safeguarding issues.

Working Together to Safeguard Children 2015
[Working Together to Safeguard Children March 2015](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2015)

What To Do If You Are Worried a Child Is Being Abused
[What to do if you are worried – revised guidance for all professionals to use if they are worried a student may be being abused](https://www.gov.uk/government/publications/what-to-do-if-you-are-worried-a-child-is-being-abused)

Information Sharing Guidance
[Information Sharing Guidance 2015 – revised guidance on information sharing for all professionals](https://www.gov.uk/government/publications/information-sharing-guidance-2015)

Managing Allegations Against Staff
WSCB guidance, available on WSCB website. www.wscb.org.uk

Children Missing from Home and Care
WSCB procedures, available on WSCB website www.wscb.org.uk

Positive Handling
WSCB guidance, available on WSCB website www.wscb.org.uk

Sexual exploitation
WSCB protocol and guidance, available on WSCB website www.wscb.org.uk

Domestic Violence – guide for schools
Wandsworth guidance issued June 2012

Thresholds for Intervention – Multi-Agency guidance
Wandsworth Guidance updates 2020, available on WSCP website www.wscb.org.uk

Mental Health and Behaviour in schools – departmental advice for school staff
DfE guidance, issued June 2014
DFE-00435-2014 www.gov.uk/government/publications

Whistleblowing policy – Wandsworth Council HR or general guidance can be found at
<https://www.gov.uk/whistleblowing>

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding student protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Safeguarding Children and young people from knife crime
OFSTED report March 2019

Vulnerable Children in a Digital World
Adrienne Katz and Dr Aimen El Asam in partnership with Internet matters.org

Wandsworth Safeguarding Children Partnership – published arrangements 27th June 2019

Ofsted framework for Inspecting safeguarding in early years, education and skills

School report to Child Protection Conference or Looked After Child review

School	
Name of student	
Date of birth Year group	
Name of class teacher	

When completing the sections below consider issues such as attendance and punctuality; preparation for school / learning; general appearance; emotional presentation and wellbeing; indicators that student may have suffered harm / be at risk of harm; disclosures made by student; behaviour and social development; relationships with peers and adults; academic progress/ areas requiring improvement; contact with family; etc

What is working well?
What are we worried about?
What needs to happen?

--

Signature	
Print name	
Date	

Reports should be shared with families prior to the meeting except in exceptional circumstances
Please send this report wherever possible at least 48 hours in advance of the relevant meeting to Childrensplanning@wandsworth.gov.uk and bring copies for those attending the meeting.

Appendix 3

Guidance re potential signs of abuse from London SCB procedures

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents / carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their student is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury.
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small students
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older student.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a student getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small student, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discoloration over a bone or a joint.

Non-mobile students rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

Behavioural Indications

Some students may behave in ways that alert you to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self destructive tendencies
- Aggression towards others

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a student and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school students
- Low self esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self harming
- Running away

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents/ carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A student seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of student to grow within normal expected pattern, with accompanying weight loss

- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

Recognising Sexual Abuse

Girls and boys of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a student to talk about and full account should be taken of the cultural sensitivities of any individual student / family.

Recognition can be difficult, unless the student discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the student's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling

Appendix 4
Safeguarding / Child Protection protocol / procedures
Griffin Primary School

The designated members of staff in our school are
Angela Boyce (Outreach Services Lead)
Nicolle Atkin (SENDCo)
Carly Doyle (DHT)
Louise Black (DHT)

All staff members have a statutory responsibility to safeguard and promote the welfare of all students at all times

If you have a concern about a student or you receive information that leads you to be concerned that a student has been harmed or is at risk of harm or their welfare is being compromised you are required to act appropriately to ensure action can be taken to protect the student concerned.

The concern may be as a result of a disclosure from a student, a parent or a third party or may arise due to behaviour that has caused you to become concerned.

If a student discloses abuse please note the following key points

- Listen carefully to what the student is telling you without interrupting
- Do not promise confidentiality
- Remain non judgemental and keep an open mind
- Do not ask leading questions, or more questions than you have to – just establish what the student is telling you
- Be honest with the student and explain what you will happen next
- Record the information fully
- Pass on to the designated safeguarding lead (DSL)

In the case of any concerns always record the information clearly and be clear how the concern has arisen.

If the information you have indicates that the student has suffered harm or there is a high level of risk, ensure this is passed to the DSL immediately.

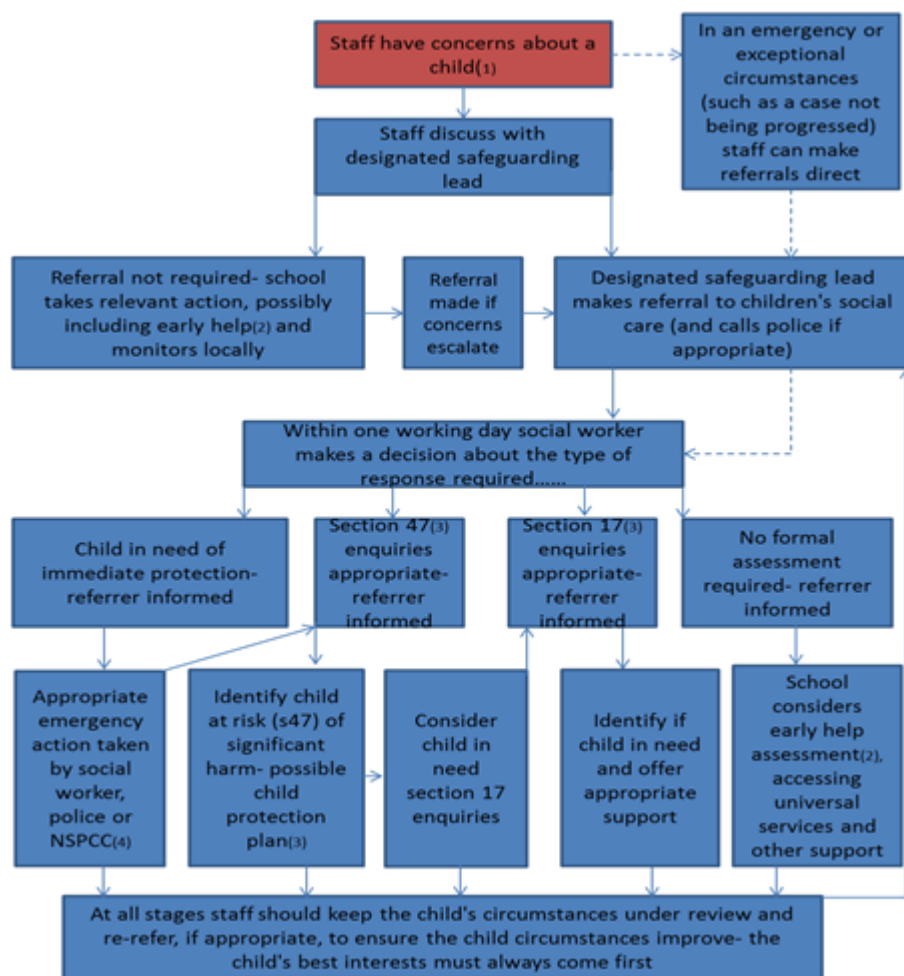
In all other instances concerns should be passed on to the DSL at the as soon as possible – do not delay.

Please remember the DSL is available to offer help, advice and guidance to staff and students where necessary. If you have a concern or problem and are unclear how to proceed ask for advice.

In all cases ensure ongoing support is offered to the student as appropriate.

Appendix 5

Referral flow chart



Appendix 6

Guidance for schools re students who abuse other students

Introduction

Managing situations where students have been abused by other students can be complex and stressful. For the purpose of this document 'student' refers to any student or young person up to the age of 18 years

It is important to be conscious that any student who is engaging in abusive behaviour towards others may have been subject to abuse from other students or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse / activity; physical harm; emotional abuse, verbal abuse.

When dealing with such allegations, professionals should be mindful that there is significant research evidence to suggest that students who behave in a sexually inappropriate and / or aggressive way towards other students are often victims of abuse themselves.

There is also significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by students.

Where an allegation is made regarding alleged abuse perpetrated by another student, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the student concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

Process

When an instance of student on student abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, a referral should be made to students's social care in respect of both students concerned. The interests of the identified victim must always be the paramount consideration.

Where the allegation relates to an incident that took place within the school, or relates to students attending the same school the school should

- Keep the involved students separate during the school day while the investigation is taking place to avoid collusion or intimidation
- Having established what is alleged to have taken place, avoid talking to the students any further about the incident (s)
- Keep a detailed log of actions, discussions and decisions
- Carry out a risk assessment and put a risk management plan in place if necessary – ensure that non teaching times are considered, especially times when students are moving around the school as the student who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in school or elsewhere, other students may know what has happened (or is alleged to have happened). Other students may have been involved, either directly or indirectly. Other students may be judgemental or make unkind, or even threatening ,comments
- Contact parents where possible (unless advised otherwise, or serious concern re further risk to student or in particularly complex situations eg sexual exploitation – in these instances seek advice)
- Consider whether the situation warrants information being shared with other parents in the school (eg where press coverage is likely) and seek advice

The decision as to whether or not behaviour directed at another student should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two students
- Whether the alleged abuser is supported or joined by other students
- Any differential in power or authority (eg related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

In such cases the needs of each student should be separately considered by social care. In cases where a significant incident has occurred or the alleged incident is of a serious nature the usual process will involve a separate strategy meeting in respect of each student, and s47 enquiries initiated, which will involve discussion with police (CAIT). Different social workers should be allocated for the student who is the victim and the student who has harmed, even if they are living in the same household. Police will decide whether an alleged offence should be subject to criminal investigation.

If the investigation / assessment concludes that the allegations are substantiated, the students should not necessarily be expected to continue their education in contact with each other. The student (ren) responsible for the abuse should be moved if necessary. The views and wishes of the student who has been abused and their parents should be appropriately considered in the decision making. Once initial actions have been taken and processes are in place consideration should be given to the provision of ongoing support / counselling for the students involved, where appropriate / necessary. Additional guidance is available via the London Child Protection procedures http://www.londoncp.co.uk/chapters/ch_harm_others.html

Appendix 7

Guidance for schools re student on student sexual violence and sexual harassment

Victims and alleged perpetrators

There are many different ways to describe students who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. For the purposes of this advice, we use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual student is most comfortable.

We also use the term 'alleged perpetrator' and where appropriate 'perpetrator'. These are widely used and recognised terms and the most appropriate to aid effective drafting of advice. However, schools and colleges should think very carefully about terminology, especially when speaking in front of students. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

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

Schools need to make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. Children need to understand that sexual violence or sexual harassment will not be dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys" and that challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts will not be tolerated as this risks normalising such behaviour.

We understand that such behaviours may reflect wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why a whole school/college approach (especially preventative education) is important.

Some students (eg those with SEND, or those who are LGBT) can be particularly vulnerable. Schools also need to be aware that staff can also be victims of sexual violence or harassment and have strategies to protect staff .

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person with his penis, that person does not consent to the penetration and he does not reasonably believe that they have consented.

Assault by Penetration: A person commits an offence if: s/he intentionally penetrates the vagina or anus of another person with a part of her/his body or anything else, the penetration is sexual, that person does not consent to the penetration and s/he does not reasonably believe that they have consented.

Sexual Assault: A person commits an offence of sexual assault if: s/he intentionally touches another person, the touching is sexual, that person does not consent to the touching and s/he does not reasonably believe that they have consented.

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

- a student under the age of 13 can never consent to any sexual activity;
- the age of consent is 16. However, it is recognised that between the ages of 13 and 16 sexual activity may be considered by the young people to be consensual. In cases where the sexual activity is mutually agreed and non- exploitative then it is not intended to instigate criminal proceedings. An assessment against risk factors should be carried out to assist in decision making in relation to safeguarding
- sexual intercourse without consent is rape.

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a student's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- upskirting (which is now a criminal offence) – this 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.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

Preventative programmes should be developed to be age and stage of development appropriate and tackle such issues as

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong; and
- addressing cultures of sexual harassment.

Responding Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any report.

Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement and being supported by other agencies, such as student's social care and the police as required.

Disclosures from students should be dealt with sensitively in line with guidance about any safeguarding disclosures. The student should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other students (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

The designated safeguarding lead (or a deputy) should ensure they are engaging with students's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a student at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the student in any decision they take. This should be with the support of student's social care and any appropriate specialist agencies.

The wishes of the victim in terms of how they want to proceed should be taken into account. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how things are being taken forward.

Appendix 8

Safeguarding sexually active young people (under 18s)

The London Child Protection Procedures has several supplementary procedures. One of these is the Procedure for Safeguarding Sexually Active Children (remembering that all young people are deemed to be a student in law until their eighteenth birthday). These are designed to help professionals identify those students and young people whose sexual relationships may be abusive.

A student under the age of 13 is not legally capable of consenting to sexual activity. Any suspicion that a student under 13 is involved in sexual activity should be discussed with the nominated student protection lead in the organisation. Under the Sexual Offences Act 2003 penetrative sex with a student under 13 is classed as rape. All cases such as these must be referred to Children's Specialist Services.

Sexual activity with a student under 16 is also an offence. However, it is recognised that between the ages of 13 and 16 this activity may be consensual. There should still be consideration as to whether this should be discussed with or referred to Children's Specialist Services as there may still be serious consequences for the young person, but no automatic requirement to do so. The younger the student the stronger the presumption must be that sexual activity may be harmful

It is also accepted that it is not always in the best interests of student for criminal proceedings to be instigated. In cases where the sexual activity is mutually agreed and non- exploitative then it is not intended to instigate criminal proceedings.

The first duty is to safeguard and promote the welfare of young people and professionals should be aware that the duty of confidentiality is not absolute in matters such as this. There may be other students involved, for example siblings, and sharing information may be required in law.

Sexual activity between the ages of 16 and 17 will not be an offence but may still involve risk or harm and so particular factors still need to be considered.

Professionals working with students need to consider how to balance students's rights and wishes with their responsibility to keep students safe from harm.

Underage sexual activity should always be seen as a possible indicator of student sexual exploitation.

In order to assess whether the relationship is harmful the following factors should be discussed:

- Is the young person competent to understand and consent to sexual activity?
- The student's living conditions (any other types of concern/ other statutory agencies involved)
- Age differences in the relationship
- Whether the student has a disability
- Power imbalances in the relationship
- Whether aggression, coercion or bribery could have been involved
- Whether the student may have been disinhibited by substances or alcohol
- If attempts had been made to keep the matter secret (beyond what would normally be expected)
- Have there been attempts at 'grooming' (through gifts, treats, money, drugs or developing a relationship with the student or their parents)
- Whether the partner is known to have had previous concerning relationships.

If there is reasonable cause to suspect that a student is suffering or is likely to suffer significant harm then a strategy meeting will be held to share concerns and agree action.

It is the responsibility of individual members of staff to ensure that the relationship they develop with students or students cannot be misinterpreted or developed beyond the professional. It is an offence for anyone in a position of trust or authority in relation to a young person to have a sexual relationship with a student or young person up to the age of 18.

Appendix 9

Children Missing from Education

All students, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Local Authorities (LA) have a duty to establish, as far as it is possible to do so, the identity of students of compulsory school age who are missing education in their area. This requires a co-ordinated approach across schools, relevant LA sections and other agencies to ensure good monitoring systems are in place.

A student going missing from education is a potential indicator of abuse or neglect. The school will follow their established procedure for unauthorised absence and for following up students who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent the risks of them going missing in future.

The school has both an admissions register and an attendance register, and all students are placed on both registers (unless students are boarders). Students must be entered on the admissions register at the beginning of the first day on which the school has agreed or been notified that the student will attend the school. If the student fails to attend the school will undertake reasonable enquiries to establish their whereabouts.

The school will make reasonable enquiries (jointly with the LA) to establish the whereabouts of a student who ceases to attend, before deleting the student from roll if the deletion is under regulation 8(1), sub paragraphs (f)(iii) and (h)(iii) (see table below)

The school will always inform the LA of any student who is going to be removed from the admission register under any of the grounds listed in the regulations (see table below)

The notification will include:

- a) The full name of the student
- b) The full name and address of any parent with whom the student usually resides
- c) At least one telephone number of the parent
- d) The student's future address and destination school (if applicable)
- e) The ground in regulation 8 under which the student's name is to be removed

The notification should be made as soon as the grounds above are met and prior to removal. This is essential so that the LA can take appropriate follow up action when required.

The school will also notify the LA within 5 days of adding a student's name to the admission register at a non-standard transition point. The notification will include all the details included in the admissions register. The school will also provide information about student admissions at standard transition points if requested to do so by the LA.

In line with the safeguarding duties of the school, all unexplained student absences will be investigated. The school must inform the LA of any student who fails to attend school, or has been absent without permission for a continuous period of 10 school days or more.

Established procedures will be followed, but each case needs to be treated on its own merits, taking into account all the facts of the case. Some students are at particular risk, and may also need referral to social care.

Grounds for deleting a student of compulsory school age from the school admission register set out in the Education (student Registration) (England) Regulations 2006, as amended	
1	8(1)(a) - where the student is registered at the school in accordance with the requirements of a school attendance order, that another school is substituted by the local authority for that named in the order or the order is revoked by the local authority on the ground that arrangements have been made for the student to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school.
2	8(1)(b) - except where it has been agreed by the proprietor that the student should be registered at more than one school, in a case not falling within sub-paragraph (a) or regulation 9, that he has been registered as a student at another school.
3	8(1)(c) - where a student is registered at more than one school, and in a case not falling within sub-paragraph (j) or (m) or regulation 9, that he has ceased to attend the school and the proprietor of any other school at which he is registered has given consent to the deletion.
4	8(1)(d) - in a case not falling within sub-paragraph (a) of this paragraph, that he has ceased to attend the school and the proprietor has received written notification from the parent that the student is receiving education otherwise than at school.
5	8(1)(e) - except in the case of a boarder, that he has ceased to attend the school and no longer ordinarily resides at a place which is a reasonable distance from the school at which he is registered.
6	8(1)(f) - in the case of a student granted leave of absence in accordance with regulation 7(1A), that — (i) the student has failed to attend the school within the ten school days immediately following the expiry of the period for which such leave was granted; (ii) the proprietor does not have reasonable grounds to believe that the student is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the student is.
7	8(1)(g) - that he is certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he nor his parent has indicated to the school the intention to continue to attend the school after ceasing to be of compulsory school age.
8	8(1)(h) - that he has been continuously absent from the school for a period of not less than twenty school days and (i) at no time was his absence during that period authorised by the proprietor in accordance with regulation 6(2); (ii) the proprietor does not have reasonable grounds to believe that the student is unable to attend the school by reason of sickness or any unavoidable cause; and

	(iii) the proprietor of the school and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the student is.
9	8(1)(i) - that he is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the student will return to the school at the end of that period.
10	8(1)(j) - that the student has died
11	8(1)(k) - that the student will cease to be of compulsory school age before the school next meets and (i) the relevant person has indicated that the student will cease to attend the school; or (ii) the student does not meet the academic entry requirements for admission to the school's sixth form
12	8(1)(l) - in the case of a student at a school other than a maintained school, an Academy, a city technology college or a city college for the technology of the arts, that he has ceased to be a student of the school
13	8(1)(m) - that he has been permanently excluded from the school
14	8(1)(n) - where the student has been admitted to the school to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the school
15	8(1)(o) where— (i) the student is a boarder at a maintained school or an Academy; (ii) charges for board and lodging are payable by the parent of the student; and (iii) those charges remain unpaid by the student's parent at the end of the school term to which they relate

Appendix 10

Role of Designated Safeguarding Lead (DSL)

The DSL is the cornerstone of day to day safeguarding in the school and should be the first port of call for any safeguarding issues.

The role of the DSL should be held by an appropriate senior member of staff, who is a member of the school's leadership team.

The DSL takes lead responsibility for safeguarding and student protection practice in the school and this should be explicit in their job description.

The DSL must have appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to

- Provide advice and support to other staff
- To take part in CP meetings, strategy discussions and other multi-agency meetings (and / or support other staff to do so)
- To contribute to the assessment of students

Schools should also ensure that they have at least one, appropriately trained, deputy DSL. The DSL (or a deputy) should be available at all times during the school day for staff to discuss any safeguarding concerns.

The activities of the DSL can be delegated to a trained deputy DSL, but the ultimate lead responsibility for CP, as set out in the guidance, remains with the nominated lead and this responsibility cannot be delegated

Key responsibilities include

- Responsibility for following up concerns and making appropriate referrals (these may be to early intervention / targeted support services, health, social care, CAMHS, Channel programme, police, DBS etc)
- Information gathering, effective monitoring systems and recording
- Liaising with other agencies as required
- Liaising with parents / carers when there are concerns
- Liaising with the Headteacher / Principal to inform him or her of key issues
- Liaising with case manager in the event of an Allegation Against a Professional
- Liaising with all staff on safeguarding matters and
- Acting as a source of support, advice and expertise for staff
- Encouraging a safeguarding ethos across the whole school community and a culture of listening to students and taking account of their wishes and feelings
- Keeping the best interests of the student, or students, in mind at all times when responding to safeguarding matters

Training

The DSL (and any deputies) should undergo training at an appropriate level to provide them with the knowledge and skills to carry out the role.

They must also attend Prevent training.

Their knowledge and skills must be updated at least annually to allow them to understand and keep up with any developments relevant to their role.

Policy and procedures

The DSL should ensure there is a safeguarding policy which is reviewed and updated annually (as a minimum); that the policy and procedures are known to, and understood by, all staff in the school; that the policy is available to parents and they understand the school's safeguarding responsibilities and that referrals may be made.

Recording

The DSL should ensure there is an effective recording system for safeguarding matters, which is kept securely and confidentially with access restricted to those members of staff who have a lead role.

When a student leaves the school, the DSL should ensure his or her safeguarding records are securely transferred to the DSL in the receiving school in a timely fashion. Confirmation of receipt should be recorded.

Appendix 11

Safeguarding recording and record keeping guidance for schools

This guidance is intended to support effective recording of key (significant) events for students, safeguarding concerns and Child Protection issues.

The importance of accurate recording is generally well understood by staff members but advice is frequently requested in respect of this issue.

Significant life events

Some key events in a student or family can have a significant impact and it is essential that these are clearly recorded on the student's file. An example of a significant event would be the death of parent, sibling or other close family member. Unnecessary distress can be caused to a student or parent if such significant information is overlooked or not known, so it is important that it is recorded in such a way as to be accessible to other members of staff who may be working with the student or in a position where they may be required to contact the family.

Key information

Schools need to have key information about students recorded and regularly updated. This information should include basic details such as

- which adults have Parental Responsibility for a student
- contact details for parents and any other nominated adults who can be contacted in case of emergency – it is advised that schools ask for three contact numbers for each student – one of which should be a trusted adult who the parent agrees can be contacted in an emergency but who does not live at the home address
- which adults the student lives with (especially in situations where parents do not live together) and contact arrangements if relevant
- any legal orders in place, particularly any which affect the care of the student
- any information which may impact on the safety of the student – eg adults who pose a risk to a student or are not permitted contact; Domestic Abuse issues etc
- details of any key professionals working with the student

Child Protection / safeguarding concerns

Many schools have specific proforma for the recording of Child Protection (CP) / safeguarding concerns. These can be very useful as they guide staff members by the completion of certain fields / questions and ensure that key information needed is not missed. Some use a coloured paper so that they are easily recognisable. Whatever the system in place it is essential that all staff are aware of the requirement to complete recording of CP / safeguarding concerns and given guidance about distinguishing between fact and opinion. An example proforma is attached – app 3

Schools are increasingly using computerised safeguarding recording systems (eg CPOMS or My Concerns) and these are generally proving to be positive in enabling effective recording and facilitating retrieval of information when needed. Guidance given to staff about good and effective recording should be the same whether they are writing it on paper or typing it into a computer system.

If injuries have been seen these should be recorded as accurately as possible, giving a clear description of the marks seen and their location.

If a disclosure has been received from a student this should be recorded using the student's own words, rather than an interpretation of what was said.

If the concern is as a result of third party information received this must be made explicit.

CP notes should be dated and signed by the member of staff who noted the concern or received the initial information about the issue.

Designated Safeguarding Leads should record when the information was received and any discussion had with parents, other staff members or professionals from other agencies, the identity of the other professional (eg name of duty social worker) and clearly note any decisions or actions agreed. This includes recording the reasons for a decision not to make an external referral if this is relevant.

Copies of referrals made to external agencies should be kept in the student's individual confidential record, alongside minutes of any meetings held, letters, e-mails etc.

Please remember when referrals are made it is important to include

- basic family details with contact details for the parents
- whether parents have been informed / consent to the referral
- if the concerns have not been discussed with the family why this is - usually only in cases where to do so may place the student at further immediate risk; where the parent is believed to have been responsible for / colluded in the student being sexually abused; or if all attempts to contact the parent have failed

- a clear explanation of your concerns and what actions you have already taken (if applicable)

Many safeguarding and / or CP concerns will not rely on a single incident or injury and will arise as a result of a series of smaller incidents, concerns and issues which build a picture that becomes more concerning over a period of time. It is therefore really important to ensure that a log of concerns is kept which will support effective decision making and (when necessary) referrals which provide clarity and evidence - based concerns.

It is advised that all designated staff keep a single record / log to note all students for whom they have a safeguarding file (example attached app 1), which logs basic details, status etc

It is also advisable to record a brief risk assessment for each pupil for whom school has CP concerns as this informs the level of risk / concern and what actions may need to be taken, (example attached app 2). For some students where there are complex concerns / high levels of concern related to risk, a more detailed risk assessment may be required.

Confidentiality

Records can be paper files or computerised. What is important is that CP information is recorded and kept securely, with access to particularly sensitive information restricted where necessary.

When passing on sensitive or confidential information to other agencies please ensure this is done in a secure manner.

Transfer and retention of records

When students leave your school any CP / safeguarding information / records must be passed on to the receiving school (once confirmed) in a secure way and confirmation of receipt should be obtained.

Safeguarding and CP information is regarded as personal information and you do not necessarily need consent to share this. Generally, families should be made aware that information will be shared with a new school, what will be shared, with whom and why. If it is not reasonable to do this, or by doing so a student or young person's safety could be put at risk information can be shared.

Guidance as to whether copies of CP / safeguarding files should be retained in the originating school is not absolute, but local practice has been developed and it is recommended that schools seek advice from the Local Authority (or their legal provider if relevant).

In Wandsworth, therefore, we recommend that key CP / safeguarding records are copied and one copy is retained in the originating school. It is immaterial whether original is retained and copy sent or vice versa

It is fine to retain either paper or electronic records so if there is shortage of filing space records can be scanned and retained electronically – some schools have chosen to do this – however if there are original signed notes relating to a serious disclosure it is advisable to retain the paper copy as these could be required

The computer systems that are on the market have facilities to transfer the data to other schools. At the time of writing, this does not mean that the data is transferred, it simply means that the previous school relinquish access, and access rights are transferred to the new school; the data is kept intact. If unsure please check with your provider.

Records should be retained 'long term, until the student is 25 years of age or older, then reviewed. IRMS guidance states that records should be retained for a longer period in 'instances where detailed information about activities in school may form an important part of safeguarding for that individual'.

This guidance is included in Government guidance: [Data protection: toolkit for schools](#) and the annual review checklist.

In addition, since the Independent Inquiry into Child Sexual Abuse (IICSA) was established, organisations should not destroy any records that might be relevant. Since we may not know at the time which records may be relevant, this provides justification for retention. Judicial review also supports this stance.

Schools should update their data audit log to reflect their retention period for these records

Allegations against staff and volunteers

Please note that any concerns of a safeguarding nature / allegations against staff and volunteers must be recorded and retained. These matters need to be treated as confidentially as possible and the records kept securely.

The records should include

- record of initial concern / allegation
- who raised the initial concern
- any accounts provided by those involved or witnesses
- contact with parent / carer of student(ren) concerned
- how the matter was investigated
- action taken
- consultation with LADO / advice given
- outcome of above
- risk assessment
- safeguarding measures put in place
- minutes of ASV meeting (if held)
- details of any disciplinary action / hearing (where relevant)
- outcome of police involvement (where relevant)
- final LADO outcome note

Details of how an issue was investigated and the outcomes should not be included on the student's file (as details of the staff member or volunteer need to be protected. Brief reference should be put on student's file so that records can be cross referenced if required at a later stage. We need to recognise that there is an increase in non-recent allegations and good recording keeping supports any current investigations immeasurably.

Peer on peer abuse

All staff are aware that children can abuse other children (often referred to as peer on peer abuse). Staff are trained to recognise the indicators and signs of peer on peer abuse and know how to identify and report it. All staff understand the importance of challenging inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

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

Similar guidance should be followed where there have been instances of peer on peer abuse or concerns reported about concerning or possibly abusive behaviour between students. ie

- record of initial concern / allegation
- who raised the initial concern
- any accounts provided by those involved or witnesses
- contact with parent / carer of student(ren) concerned
- how the matter was investigated
- action taken
- risk assessment
- safeguarding measures put in place
- consultation with Safeguarding in Education Advisor / advice given
- contact with Children's Social Care
- contact with police (if relevant)

The relevant information should be recorded and retained on records for both students as well as copies of any referrals made.

Students of concern list

EXAMPLE

Form 1

Name	Dob / class	Status <i>e.g CLA; subject to CP plan; CiN; privately fostered etc</i>	Nature of concern <i>e.g domestic abuse; CP concerns; self-harming; victim of bullying etc</i>	Other agencies / professionals involved <i>eg EWO; EP; school nurse; social care etc</i>

Safeguarding Risk Assessment (Individual Students)

Form 2

Name

Date of birth

Class / tutor group

Date of assessment

Carried out by

Reason for risk assessment

Category: personal safety / emotional safety / physical safety / other

Identifying the risks / evidence of concern

Assessing the risk

LOW

MEDIUM

HIGH

Actions being taken / reducing the risk

Other professionals involved

Logged on system (date)

Safeguarding concern report

Form 3

Name

Dob / class / tutor group

Reason for concern

eg disclosure by student; behaviour observed; injury noted etc

Details of concern

Is parent / carer aware of concern?

Name of member of staff reporting concern

Date

Received by DMS

Date

Actions to be taken

Appendix 12

Serious youth violence and knife crime

See pdf version in policy folder.

Appendix 13

Useful contacts

Ameliah Rayn

Safeguarding In Education Officer

07929862210

MASH / referral and assessment service
(duty SW)

020 8871 6622

Out of hours duty service

020 8871 6000

Safeguarding Standards Service (manager: Ruth Lacey)

Principal Administrator Jackie Reynolds

020 8871 7208

LADO

Anita Gibbons

07974 586461

Anita.Gibbons@richmondandwandsworth.gov.uk

Link Social worker *(name and contact to be entered by each school if appropriate)*

School nurse

Alison Madert

amadert@nhs.net

Police

Melissa Ewin

melissa.ewin@met.police.uk

Current Police Sgt for schools liaison officers

Amreek Singh

Wandsworth safety net

0207 801 1777

(for Independent Domestic Abuse advisors)

Appendix 14: Low level concerns (from KCSIE 2021)

407. As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one of KCSIE 2021) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low level concern?

409. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

410.

Examples of such behaviour could include, but are not limited to: being over friendly with children;

having favourites;

taking photographs of children on their mobile phone;

engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

using inappropriate sexualised, intimidating or offensive language.

411.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

412. It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Staff code of conduct and safeguarding policies

413. As good practice those with responsibility for governance and proprietors should set out their low-level concerns policy within their staff code of conduct and safeguarding policies as set out in Part two of this guidance. They should make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e. to create and

embed a culture of openness, trust and transparency in which the school's or college's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

414. As set out in Part two of this guidance, those with responsibility for governance or proprietor should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

415. Schools and colleges can achieve the purpose of their low-level concerns policy by, for example:

- ensuring their 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 safeguarding concerns with the designated safeguarding lead (or a deputy);
- 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; and,
- helping identify any weakness in the school or colleges safeguarding system. [Sharing low-level concerns](#)

416. Low-level concerns about a member of staff should be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the headteacher or principal.

417. Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

418. Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy (and paras 419 and 421 below), and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

[Recording low-level concerns](#)

419. All low-level concerns should be recorded in writing by the designated safeguarding lead (or deputy). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

420. Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

421. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

422. It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

References

423. Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns

424. Concerns about safeguarding should be reported to the designated safeguarding lead or their deputy. The school or college policy should set out the procedure for responding to reports of low-level concerns. If the concern has been raised via a third party, the designated safeguarding lead should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

425. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

426. A good low level concerns policy will simply be a reflection and extension of the school's or college's wider staff behaviour policy/code of conduct.

427. More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](https://www.farrer.co.uk).