



Hadley Wood Primary School

Child Protection Policy and Procedures

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Name of person responsible for this policy	Fran Worby
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School Designated Safeguarding Team:

- Lynsey Jennings, Designated Safeguarding Lead, Deputy Headteacher
- Fran Worby, Designated Safeguarding Team Member, Headteacher
- Tina Stanley, Designated Safeguarding Team Member, SENCO Inclusion Lead,
- Lyndsey Albon Designated Safeguarding Team Member, Key Stage 1 Lead

Child Protection and Safeguarding Governor: Mr Tom Stacey

Important contacts

ROLE/ORGANISATION	NAME
Headteacher	Fran Worby
Designated Safeguarding Lead (DSL)	Lynsey Jennings
Deputy DSL	Fran Worby, Tina Stanley, Lyndsey Albon
Named person for Allegations Against Staff and Volunteers (Headteacher)	Fran Worby
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MASH Duty Line	0208 379 5555
Chair of Governors	Richard Walker
Safeguarding Link Governor	Tom Stacey
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If you would like to contact a member of the Hadley Wood Primary School DSL team please telephone 020 8440 4359 or email office@hadleywood.enfield.sch.uk

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1 Aims

At Hadley Wood Primary School we believe that all children have a right to be safe and should be protected from all forms of abuse and neglect. The purpose of this policy is to safeguard and promote the welfare of children at Hadley Wood Primary School.

Safeguarding is everyone's responsibility. All members of staff are committed to recognising and reporting all concerns relating to child well-being and are vigilant in spotting signs of abuse and maltreatment. As such, we promise to have an open and positive culture around safeguarding that puts pupils' interests first. This means we:

- protect pupils from serious harm, both online and offline
- are vigilant, maintaining an attitude of 'it could happen here'
- understand and follow the school's policies and procedures
- are open and transparent, sharing information with others and actively seeking expert advice when required
- work together with other agencies when appropriate to make sure that support for children, young people and families is effective and supports improved outcomes ensure that all those who work with pupils are trained well so that they understand their responsibilities and the systems and processes that the school operates and are empowered to 'speak out' where there may be concerns.

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework. (Working Together to Safeguard Children 2023 p7 and 8)

This Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the whole school staff and volunteers. All staff, volunteers and visitors to the school should be made aware of systems within our school or

college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- Child Protection Policy and Procedures, which should amongst other things also include the policy and procedures to deal with child-on-child abuse;
- Behaviour Policy in Schools which should include measures to prevent bullying, including online bullying, prejudice-based and discriminatory bullying;
- Staff Code of Conduct should amongst other things, include low-level concerns, allegations against staff and whistleblowing as well as acceptable use of technologies, staff/pupil relationships and communications including the use of social media;
- Safeguarding response to children who are absent from education; and also important that staff determine how best to build trusted relationships with children and young people which facilitates communication;
- Role of the DSL including the identity of the DSL and any Deputy DSLs.
- Copy of Part One Keeping Children Safe in Education (2025) and should be signed to say it has been read and understood. Annex B Further information
- Annex A, condensed version of Part one of KCSiE (DfE 2025). It can be provided (instead of Part one) to those staff who do not directly work with children

2 Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- › [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [Working Together to Improve School Attendance](#) which clarifies roles and responsibilities for schools, local authorities and parents in ensuring adequate school attendance
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.
- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- › This policy aligns with and should be read along with the school's Safer Recruitment Policy, Staff Code of Conduct Policy, Positive Handling Policy, Anti-Bullying Policy, Behaviour in Schools Policy, Health and Safety Policy, Educational Visits Policy, Online-safety Policy and any other relevant policy.

3 Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The London Borough of Enfield
- › North Central London Integrated Care Board
- › The Metropolitan Police Commander for Enfield and Haringey

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4 Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face, in accordance with [The Human Rights Act 1998](#) and [The Equality Act 2010](#).

We give special consideration to children who:

- › Have special educational needs and/or disabilities (SEND) or health conditions
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

5 Roles, responsibilities and procedures

Our school procedures for safeguarding children will comply with those recommended by the Safeguarding Enfield Partnership (Enfield Council, NHS Enfield Clinical Commissioning Group and the Metropolitan Police Service) All professionals within the Safeguarding Enfield Partnership must work in accordance with the London Child Protection Procedures (7th edition)

We recognise that it is essential to establish positive and effective working relationships with other agencies that are partners of the City and Enfield Safeguarding Children Partnership, including Children and Families' Services and the MASH. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children and work together to secure positive outcomes.

Our school will work openly and collaboratively with parents/carers and seek consent (where possible) when sharing information with other agencies. We will inform parents/carers of our responsibilities to safeguard their children. We will make this policy available via our website and provide additional safeguarding information via our newsletter and parents/carers forums.

We will ensure that:

We have designated members of staff who undertake regular training every two years: Lynsey Jennings is Designated Lead (person responsible for making decisions about Child Protection and Safeguarding and liaising with external bodies) with Fran Worby, Tina Stanley and Lyndsey Albon forming part of the DSL Team. Each have received the relevant full DSL training.

All members of staff develop their understanding of the signs and indicators of abuse and refresh their training every two years formally. During the interim year the training is delivered annually by one of the trained DSLs. All staff are invited to this training, together with member of the Governing Body. The school will ensure that regular relevant safeguarding training is offered to all staff working in partnership with the school and ensure that Part 1 of KCSIE is read as part of this training. Records of any

child protection training undertaken is kept for all staff and governors. If a member of staff is absent from the training steps will be taken for them to take the training at the first opportunity.

All members of staff know how to respond to a pupil who discloses abuse:

- All staff members have a duty to identify and respond to suspected and actual abuse or disclosures of harm. Any member of staff, volunteer or visitor to our school who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the Designated Safeguarding Lead (DSL) or, in their absence, the Deputy Designated Safeguarding Lead. Posters identifying the DSL and Deputy DSLs are displayed around the school.
- Concerns about a child at risk of radicalisation or extremism will be raised with the PREVENT and Designated Safeguarding Leads.
- All action is taken in accordance with the following guidance;
 - Safeguarding Enfield Partnership guidelines – Pan-London Child Protection Procedures
 - Keeping Children Safe in Education (DfE, 2025)
 - Working Together to Safeguard Children (DfE, 2023)
 - PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015) including PREVENT Duty Guidance 2023
- Where there is risk of immediate harm, concerns will be referred by telephone using the relevant local authority Multiagency Safeguarding Hub (MASH) or the Police. Less urgent concerns or requests for support will be referred via the relevant local authority MASH for consideration of Early Help support as appropriate.
- Wherever possible, the school will share any safeguarding concerns, or an intention to refer a child to the relevant local authority (MASH) with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation.
- On occasions, it may be necessary to seek advice from the Enfield MASH or the Police in making decisions about when it is appropriate to share information with parents or carers.
- If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for reconsideration of the case with the Designated Safeguarding Lead (DSL) who will escalate the concern as appropriate.
- If, for any reason, the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead is not available, this should not delay appropriate action being taken. Safeguarding contact details are displayed in the school to ensure that all staff members have unfettered access to safeguarding support, should it be required. In addition, where there is no Designated Safeguarding lead (DSL) or Deputy DSL available on site (due to sickness or other circumstances beyond our control), a member of the Senior Leadership Team (SLT) will take responsibility for safeguarding and will inform

all school staff and volunteers of this by email. A member of the Safeguarding Team will be contactable at all times via telephone, if not on site.

- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures.
- All staff will have read Part 1 of the Government Guidance *Keeping children safe in education (September 2025)*. This guidance contains reference to specific safeguarding issues and provides links to further information as well as providing further information on child sexual exploitation, female genital mutilation and preventing radicalisation.
- All staff will have read the school safeguarding and child protection policy and signed that they have understood it. It is the responsibility of senior managers and Chair of Governors to ensure all staff can access and understand Part 1 of the document *Keeping children safe in education (September 2025)*.
- Our procedures will be regularly reviewed and up dated.
- All new members of staff will be given a copy of our child protection procedures and of the Government Guidance; *Keeping children safe in education (September 2025)* part 1 as part of their induction into the school. All staff will sign to say that they have read and understand these documents.
- We provide "refresher sessions" each September to remind staff about key issues and school protocols. Careful records of staff training will be kept and filed within the school's safeguarding file.
- A weekly email with relevant key safeguarding information to ensure that safeguarding is at the forefront of all staff's minds.

Safeguarding and child protection is everyone's responsibility.

This policy applies to all staff, trainees, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour Policy
- › Pastoral support system
- › Planned programme of relationships, sex and health education and Personal, Social, Health and Citizenship education
- › Planned programme of values assemblies, with these values also being carefully through our curriculum
- › Our planned programme for lessons on online safety, including an awareness of misinformation through online sources

5.1 All staff

All staff will

- › Read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- › Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- › Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- › Provide a safe space for vulnerable pupils to speak out and share their concerns

All staff will be aware of and understand:

- The school systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and members of the designated safeguarding team, the Behaviour Policy, the Online Safety Policy and the safeguarding response to children who go missing from education
- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- › What to look for to identify children who need help or protection

5.2 The designated safeguarding lead (DSL and deputy designated safeguarding lead (DDSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school, supported by one or more Deputy Designated Safeguarding Leads (DDSL). This includes online safety, including understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The DSL will be given the time, funding, training, resources and support to:

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- › Contribute to the assessment of children
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Have a good understanding of harmful sexual behaviour
- › Lead on online safety, including overseeing filtering and monitoring systems and processes in place at our school

The DSL will also:

- › Keep the Headteacher informed of any issues
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

5.3 The Governing Body

Governing bodies must ensure that all required policies relating to child protection and safeguarding are in place and that the Child Protection and Safeguarding Policy reflects statutory and local guidance. They will facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

Our Child Protection & Safeguarding governor is **Mr Tom Stacey**.

Our **Governing Body** will ensure that:

- All governors and should receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- There is a named Governor lead for safeguarding and there is good communication between them and Designated Safeguarding Lead(s) within the school
- In the event of allegations of abuse being made against the Headteacher, allegations should be reported directly to **Mr Richard Walker, Chair of Governors.**
- In the event of allegations of abuse being made against the Site Manager, allegations should be reported directly to **Mr Richard Walker, Chair of Governors.**
- Governing bodies must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their school are effective and comply with the law at all times.
- The Governing body will ensure that their safeguarding arrangements take into account the procedures and practice of the Enfield Safeguarding Partnership and remedy, without delay, any deficiencies or weaknesses regarding safeguarding practice and arrangements.
- Governors ensure the school contributes fully to inter-agency working, in line with statutory and local guidance. It ensures that information is stored and shared appropriately and in accordance with the statutory requirements as set out in the Data Protection Act 2018 and in line with GDPR requirements.
- Governors should ensure that the policy is updated annually and all staff are aware of expectations set out in the staff Code of Conduct
- Governors also ensure there is a named Designated Safeguarding Lead and Deputy Safeguarding Lead(s) in place and that they have their safeguarding role explicitly within their job descriptions and are trained for the role as set out in Keeping Children Safe in Education 2025
- Governors recognise the pivotal role schools have to play in multi-agency safeguarding arrangements. They ensure that the school contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#)
- The governing body ensures that all staff have the knowledge, skills and understanding of children who have an allocated social worker; looked after and previously looked after children in order to recognise their additional vulnerabilities and keep them safe
- Governing bodies should put in place appropriate safeguarding responses to children who are absent from education for prolonged periods and/or repeated occasions to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future. The school follows the LA policy 'Children Absent from Education'.

- Governors ensure that children are taught to keep themselves safe, including online, making sure that appropriate filters and monitoring systems for online usage in school are in place. This will include children that are accessing online learning at home. Our children will also be taught how to keep themselves safe through teaching and learning opportunities as part of a rich and balanced curriculum. This may include covering relevant issues through Relationships Education and Relationships and Sex and Health Education (RSHE).
- The governing body and school leadership team are responsible for robust, safer recruitment procedures that help to deter, reject or identify people who may abuse children. The school adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place (see the school's 'Safer Recruitment' policy for further information). It also ensures that volunteers are appropriately supervised in school. We will undertake a risk assessment and use our professional judgement when deciding whether to obtain an enhanced DBS certificate for any volunteer undertaking unregulated activity.
- Where services or activities are provided on the school premises by another service, group or individual, the school will check they have appropriate policies and procedures in place in regard to safeguarding children and have 'hire agreements' with external groups and individuals.
- Policies and procedures are reviewed annually and provide information to the Local Authority about them and about how the above duties have been discharged.
- Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- Governing bodies are expected to support the school in ensuring that schools meet the filtering and monitoring standards 'Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.'

5.4 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- › Ensuring that staff (including temporary staff, contractors and volunteers):
 - › Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - › Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
 - › Communicating this policy to parents/carers when their child joins the school and via the school website
 - › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
 - › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- › Ensuring the relevant staffing ratios are met
- › Overseeing the safe use of technology, mobile phones and cameras in the setting

6 DSL Decision-Making

Once concerns are identified and shared with DSLs, DSLs and involved staff will decide together how best to proceed to support the child and to mitigate the risk. DSLs can consult with MASH at any point. Important contact details can be found on Page 2 of this document.

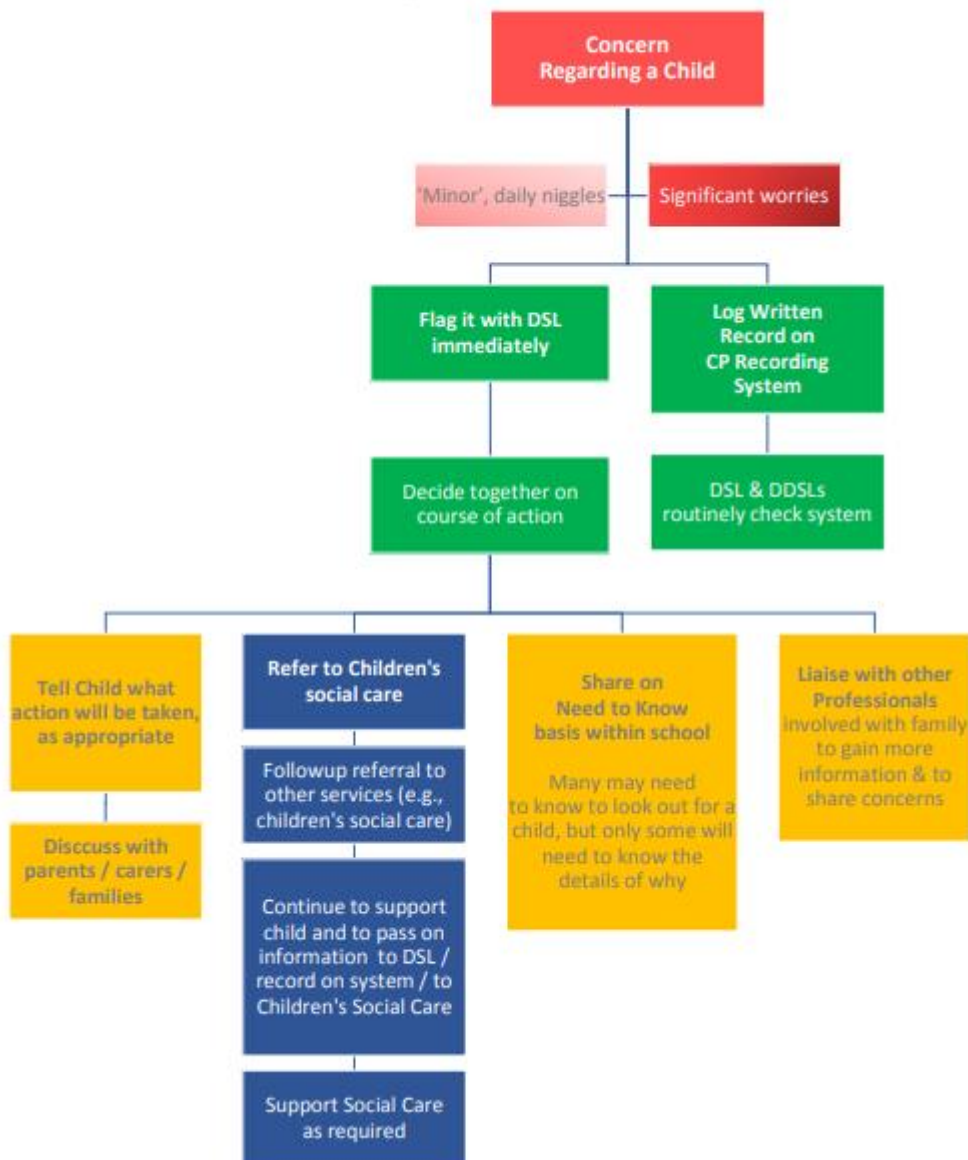
Options for action are:

Pastoral Care	Keeping Children Safe in Education acknowledges the casework that schools undertake on a pastoral level. This includes managing any support for the child internally via the school’s own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.
Early Help (MASH)	Schools can refer children and families for early help assessment and support, with the informed consent of parents.
Referral to statutory services (MASH)	<p>A referral must be made to MASH/children’s social care (and if appropriate the police) immediately if the child is:</p> <ul style="list-style-type: none"> • A child in need; defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled • Suffering, or likely suffering, harm.

Allegation of harm to a child by a practitioner	If the alleged harm to a child is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.
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Following several cases nationally where senior leaders in schools failed to act upon concerns raised by staff, [Keeping Children Safe in Education](#) emphasises that any member of staff must contact and/or make a referral to Children’s Social Care if they are concerned about a child.

Procedures for Reporting Concerns in Setting



Referrals to the MASH should be made immediately when there is a concern that the child is suffering significant harm or is likely to do so. It is good practice to notify MASH by phone and/or email to discuss the situation prior to sending a written referral. This will help determine the level of intervention and will also give children's social care and the police time to decide to come and see the child that same day in school, if deemed necessary.

In this school the DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the child. Still, there are circumstances where another member of staff must refer without delay:

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

Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

7 Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure at Hadley Wood Primary School

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

8 Confidentiality

Timely information sharing is essential to effective safeguarding and the fear of sharing information must not be allowed to prevent the promotion of the welfare of any child. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

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

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL.

9 Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

9.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Key contacts including the LADO, Channel Helpline and Mash Duty line can be found on Page 2 of this document.

Tell the DSL as soon as possible if you make a referral directly.

9.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- › Listen to and believe them. Allow them time to talk freely and do not ask leading questions (Use the TED approach – Tell me..., Explain to me... Describe)
- › Stay calm and do not show that you are shocked or upset
- › Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- › Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- › Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- › Upload all information immediately onto Safeguard https://smoothwall.auth.goria.cloud/login?redirect_uri=https%3A%2F%2Fapp.safeguard.software%2Fdashboard.asp

- › Alternatively, if appropriate, make a referral to children’s social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- › Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- › Not recognise their experiences as harmful
- › Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

9.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

9.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible,

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

9.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social

care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 if you:

- › Think someone is in immediate danger
- › Think someone may be planning to travel to join an extremist group
- › See or hear something that may be terrorist-related

9.6 If you have a concern about mental health

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

9.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the chair of governors.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO). Contact details can be found on page 2 of this document.

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

10 Allegations of abuse made against other pupils

At Hadley Wood Primary School, we recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

The School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

- The DSL (or DDSL) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2025 and HSCP procedures.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the school/college and where necessary will be referred to Children’s Services and/or the police.

Most cases of pupils hurting other pupils will be dealt with under Hadley Wood Primary School’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- › Is serious, and potentially a criminal offence
- › Could put pupils in the school at risk
- › Is violent
- › Involves pupils being forced to use drugs or alcohol
- › Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- › You must record the allegation and tell the DSL, but do not investigate it
- › The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- › Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- › Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to report abuse using our reporting systems easily and confidently
- › Ensure staff reassure victims that they are being taken seriously
- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

- › Ensure staff are trained to understand how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- › Be alert to the likelihood of the involvement of social media

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

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

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

All staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. All staff should be clear of our school’s policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in our school of Child-on-Child abuse it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their DSL (or DDSL).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. 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.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault. (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos¹¹ (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).

- **10.1 Child-on-child sexual violence and sexual harassment**

- When responding to concerns relating to child-on-child sexual violence or harassment, Our school will follow the guidance outlined in Part five of KCSIE 2025.
- The School recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' We recognise sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school/college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- The School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.
- The School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation

- The DSL (or DDSL) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2023 and HSCP procedures.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the school/college and where necessary will be referred to Children's Services and/or the police.

Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult students, or school/ college staff
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Services and/or the police) to ensure a consistent approach is taken.

11 Sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- › Delete the imagery or ask the pupil to delete it
- › Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery. This is the DSL's responsibility.
- › Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- › Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- › What further information is required to decide on the best response
- › Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to delete or remove images or videos from devices or online services
- › Any relevant facts about the pupils involved which would influence risk assessment
- › If there is a need to contact another school, college, setting or individual
- › Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- › The incident involves an adult

- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Safer Schools officer or the local neighbourhood police (101).

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum coverage

Our carefully sequenced curriculum enables pupils to be introduced to protective and preventative content in a way that does not cause unreasonable alarm and does not appear to normalise risky behaviours or activities. Further information on this can be found within our PHSE Curriculum Overview

(<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=61&type=pdf>), and in the online safety aspects of our Computing Curriculum Content Overview, for Year 6 (<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=384&type=pdf>)

12 Reporting systems for our pupils

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we:

- › Put systems in place for pupils to confidently report abuse including, talking to trusted adults, using the trust box in each classroom and ensuring children are regularly advised how to access support within school.
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

13 Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, Hadley Wood Primary School:

- › Has robust processes in place, including filtering and monitoring systems, to ensure the online safety of pupils, staff, volunteers and governors
- › Protects and educates the whole school community in its safe and responsible use of technology, including mobile and smart technology
- › Sets clear guidelines for the use of mobile phones for the whole school community
- › Establishes clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- › Children are not permitted to have a mobile phone onsite and must hand these into the office on arrival

The 4 key categories of risk

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

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

13.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Hadley Wood Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse, enable misinformation, and/or expose pupils to harmful content.

The school will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

14 Vulnerable Pupil Groups

14.1 Children with SEND or medical needs

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges

We offer additional pastoral support for more vulnerable pupils.

14.2. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- › Responding to unauthorised absence or missing education where there are known safeguarding risks
- › The provision of pastoral and/or academic support

14.3 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- › Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- › The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- › Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

14.4 LGBTQ+

Hadley Wood Primary School recognises that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) are at increased risk of harm from their peers, their families and themselves.

We will:

- › Ensure all pupils are treated with respect
- › Provide a safe space and additional pastoral support for children who may identify as LGBTQ+
- › Educate pupils through our PHSE curriculum ,where pupils learn about stereotyping, including gender stereotyping and can identify stereotypes as presented in the media and wider world. Pupils are supported to enable them to feel able to challenge gender stereotype. They learn about diverse role models and take part in a workshop to further improve aspirations. Pupils learn about prejudice and discrimination and how this can make people feel. Pupils identify some discriminatory language (homophobic, sexist, disablist, racist and transphobic) and know what to do if they experience discriminatory language at school. They understand how discriminatory language can make people feel and that this is unacceptable.

14.5 Homelessness

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

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

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

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

Both Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, it may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation: Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children

in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

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

Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess. The indicators for child sexual exploitation can sometimes be mistaken for 'normal adolescent behaviours'. It requires knowledge, skills, professional curiosity and an assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly and appropriate support is given. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something); for the victim and/or perpetrator or facilitator. Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). It is critical to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a child/young person does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Whilst there can be gifts or treats involved in other forms of sexual abuse (e.g. a father who sexually abuses but also buys the child toys) it is most likely referred to as child sexual exploitation if the 'exchange', as the core dynamic at play, results in financial gain for or enhanced status of, the perpetrator. Where the gain is only for the perpetrator/facilitator, there is most likely a financial gain (money, discharge of a debt or free/discounted goods or services) or increased status as a result of the abuse. If sexual gratification, or exercise of power and control, is the only gain for the perpetrator (and there is no gain for the child/young person) this would not normally constitute child sexual exploitation, but should be responded to as a different form of child sexual abuse.

If, as a school, we are concerned a child is being sexually exploited we will follow the procedures set out in this document and make reference to the guidance provided by [CHSCP](#). This further Governmental guidance can be useful when considering cases of CSE.

Child Criminal Exploitation - As set out in the Serious Violence Strategy, published by the Home Office, criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) it may involve an 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. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

County Lines - As set out in the Serious Violence Strategy, published by the Home Office, County Lines is the term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated

mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

14.7 Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used.

If staff become aware that this may be an issue they must report it to the Designated Safeguarding Lead at once.

14.8 FGM

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

The Serious Crime Act 2015 (Home Office, 2015) places a duty on **teachers** to notify the police of any known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18.

Our school will operate in accordance with the statutory requirements relating to female genital mutilation in line with the London Child Protection Procedures.

If a teacher (persons employed or engaged to carry out teaching work at schools and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the teacher must report this to the police via 101. This is a mandatory reporting duty. KCSiE (DfE 2025) further information on how to report this can be found here:

https://assets.publishing.service.gov.uk/media/5a8086f2ed915d74e33faefc/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

14.9 Honour Based Violence (HBV)

This encompasses crimes which have been committed to protect or defend the honour of the family and /or community, including FGM, forced marriage and practices such as breast ironing.

It often involves a wider network of family or community pressure and can involve multiple perpetrators.

All forms of HBV are abuse and if staff become aware of children discussing these in school they must report this to the Designated Safeguarding Lead.

• Radicalisation

- Children can be vulnerable to extremist ideology and radicalisation. Radicalisation is defined as "The process of a person legitimising support for, or the use of, terrorist violence. Protecting children from this risk is similar to protecting them from other forms of harm and abuse. The Counter-Terrorism and Security Act (HMG, 2015) Section 26 places a duty on schools in the

- exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.
- This duty is known as the PREVENT duty. It requires schools to:
 - teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical
 - development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion;
 - be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas and;
 - be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.
 - CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to radicalisation and being drawn into terrorism.
 - All staff understand how to identify those who may benefit from this support and are aware of relevant agencies to contact in circumstances where an individual demonstrates indicators of concern, as well as how to make a referral using Enfield referral pathways

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Mental Health and Wellbeing

All staff are aware that mental health can in some cases be an indicator that a child has or is suffering from or at risk of abuse.

Staff are able to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem.

Where there are mental health concerns about a child that is also a safeguarding concern, immediate action will be taken following the school child protection policy. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Our school will work to protect the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs.

We understand that there are risk factors which increase a child’s vulnerability and protective factors that can promote or strengthen resilience. The more risk factors

present in a child's life, the more protective factors or supportive interventions are required to promote further growth and resilience.

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

Where there are concerns that a child may be self-harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a child discloses self-harm or found to be self-harming the Designated Safeguarding Lead (DSL) or relevant key person will take the time to establish any underlying concerns. The child will be supported to access services using the appropriate Enfield referral pathways.

Domestic Abuse

The Domestic Abuse Act 2022 received Royal Assent on 29 April 2022. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2022 Act).

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

As a school, if we are concerned about the life lived experience of children who are, or may be, living in a household where domestic violence and abuse are present, we will adhere to our safeguarding procedures and consult with Enfield MASH.

Operation Encompass - Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available via the Enfield Safeguarding Team.

15 Record-keeping

At Hadley Wood Primary School, we record all safeguarding on the programme Safeguard. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within **5 days** for an in-year transfer, or within **the first 5 days** of the start of a new term.

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

16 Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand Hadley Wood Primary Schools safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This includes contractors, trainees and volunteers.

This training will be regularly updated and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- › Have regard to the Teachers' Standards to support the expectation that all teachers will have a clear understanding of the needs of all pupils and will manage behaviour effectively to ensure a good and safe environment

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

16.2 The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

16.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

17 Recruitment

Hadley Wood Primary School pays full regard to the statutory guidance for schools and colleges; Keeping Children Safe in Education (2025) – Part Three: Safer Recruitment. We ensure that all appropriate measures are applied in relation to everyone who works in the school and who is therefore likely to be perceived and experienced by the children as a safe and trustworthy adult. This includes volunteers, supervised volunteers and staff employed by contractors.

Safer recruitment practice includes scrutinising applicants, verifying identity and academic/vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checks with the Disclosure and Barring Service (DBS).

In line with statutory changes, underpinned by regulations, the following will apply:

- DBS and barred list checks will be undertaken for all posts that are deemed regulated activity, and for all other posts an enhanced DBS check will be undertaken unless they are supervised roles that are deemed not to meet the definition of regulated activity
- This school is committed to keeping an up-to-date Single Central Record detailing the range of checks carried out on our staff
- All new appointments to our school workforce who have lived outside the UK will be subject to additional checks as appropriate
- Our school ensures that supply staff have undergone the necessary checks and will be made aware of this policy

- Identity checks that must be carried out on all appointments to our school workforce before the appointment is made, in partnership with the Local Authority (LA)
- Staff responsible for recruiting and appointing must be suitably qualified.
- Schools should inform shortlisted candidates that online searches may be done as part of due diligence checks including online pre recruitment checks for shortlisted candidates.
- Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

18 Checking the identity and suitability of visitors

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

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

Visitors are expected to sign on the visitors page of the iPad and wear a lanyard.

- A red lanyard means that the school have not seen a valid DBS and therefore they must be accompanied by a member of staff at all time.
- A green lanyard means that the school have seen a valid DBS, and the visitor may walk around the school unaccompanied.

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

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

DBS details will be uploaded onto the SCR.

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

19 Attendance and Punctuality

Hadley Wood Primary Schools attendance policy is located on the website under School Policies, (<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=368&type=pdf>)

19.1 Children Missing in Education

If a child on roll at Hadley Wood Primary School does not attend because of a move of home or school, because the parent has decided to home educate, or for a reason unknown to the school, the following steps will be taken:

- the child will remain on roll at Hadley Wood Primary School until off-rolling is authorised
- the new school will be contacted and confirmation of the child's registration received in writing
- the school will inform the local authority if enrolment at another school cannot be confirmed

We will refer all cases of concern to the Education Welfare Officer (EWO) and Children and Families Service. When parents inform our school that they wish to 'home educate' their child, our school will inform the Education Attendance Service (EAS), who will implement the 'Elective Home Education' procedure. Enfield Council is responsible for the delivery of CME (Children Missing from Education) duties defined by the Education Act Amendments and we will refer to the Pupils Out Of School Team as necessary.

19.2 Children Absent in Education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing

information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

19.3 Missing pupils

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

- Search the school premises, or offsite location (if the child is on an educational visit)
- If the child is not located within 10 minutes the police will be phoned
- Once the police have been phoned, the parents and carers will be notified.

19.4 Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Keep the child in late collection (with a member of school staff) until 3:45 and ring the parents/carers. The person ringing will leave a voice message to explain that the child has not been collected.
- At 3:45 the child will be sent to our wrap around care providers (Top Sports Academy), who will charge the parent for the session.
- At 4:50pm the DSL onsite will again ring the parent/carer and leave another voice message.
- At 5pm the DSL onsite will ring Social Services.

If the child is not picked up by 4:20, when clubs end this will be recorded onto Safeguard.

The school will monitor patterns of late collection on Arbor and meet with the parents/carer where appropriate.

20 Transport and off-site activities

Children must be kept safe while on outings. Hadley Wood Primary School will assess the risks or hazards which may arise for the children, and identify the steps to be taken to remove, minimise and manage those risks and hazards. The assessment must include consideration of adult to child ratios. The risk assessment does not necessarily need to be in writing; this is for providers to judge. Vehicles in which children are being transported, and the driver of those vehicles, will be adequately insured.

Further details for this can be found on the Education Visits Policy, located on the School Policy section of our website.

21 Links with other policies

This policy links to the following school policies and procedures, which can all be located on the school website under policies and procedures:

- › Behaviour Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=390&type=pdf>
- › Safer Recruitment Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=241&type=pdf>
- › Staff Code of Conduct – available on request
- › Complaints Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=9&type=pdf>
- › Whistleblowing Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=45&type=pdf>
- › Health and Safety Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=394&type=pdf>
- › Attendance Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=368&type=pdf>
- › Equality Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=451&type=pdf>
- › Relationships and Sex Education Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=455&type=pdf>
- › First Aid and Welfare Policy
<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=288&type=pdf>

22 Monitoring arrangements

This policy will be reviewed **annually**. At every review, it will be approved by the full governing board.

Appendices

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

Appendix 2:

Safer recruitment policy

Recruitment and selection process

[The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2025. Our Safer Recruitment Policy is also located on the Hadley Wood School Website

<https://www.hadleywood.enfield.sch.uk/attachments/download.asp?file=241&type=pdf>

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

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

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children

- That safeguarding checks will be undertaken

- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them

- Explore all potential concerns

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

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

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

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

Sign a declaration confirming the information they have provided is true

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

Seeking references and checking employment history

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

When seeking references we will:

Not accept open references

Liaise directly with referees and verify any information contained within references with the referees

Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations

Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Explore any potential areas of concern to determine the candidate's suitability to work with children

Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

Verify their identity

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

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

There are concerns about an existing member of staff's suitability to work with children; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more

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

We believe the individual has engaged in [relevant conduct](#); or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

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

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

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

Governors

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

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

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

All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. Additionally, we ensure we retain oversight of policies and procedures and communicate regularly and openly with the setting.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

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

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Enfield Local Authority.

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

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

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

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

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

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

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites

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

Sharing low-level concerns

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

We will create this culture by:

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

Helping to identify any weakness in the school's safeguarding system, through an open culture of professional curiosity, with the DSL and DDSL maintaining professionalism and where appropriate confidentiality with low level concerns.

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of

behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

Retained at least until the individual leaves employment at the school

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

References

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

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: Responding to a Safeguarding Concern - Parent Flow chart

