



The Complete Works Policies

Child Protection and Safeguarding Policy and Procedures

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1. Aims

The Complete Works school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote young people's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by the safeguarding children partnerships in the areas where our students live.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and safeguarding partnerships to safeguard and promote the welfare of students
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of young people
- [Statutory guidance on Child Sexual Exploitation \(CSE\)](#), a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation
- 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
- [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
- [National Counter Terrorist Security Office](#) Crowded places guidance and Stay safe film
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with young people
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to young people
- The [Childcare \(Disqualification\) Regulations 2009](#) (and [2018 amendment](#)) and [Childcare Act 2006](#), which set out who is disqualified from working with young people
- [City and Hackney Safeguarding Children Partnership](#)
- [Haringey Safeguarding Children Partnership](#)
- [Islington Safeguarding Children Partnership](#)
- [Lewisham Safeguarding Children Partnership](#)
- [Southwark Safeguarding Children Partnership](#)
- [Tower Hamlets Safeguarding Children Partnership](#)

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. Appendix 1 explains the different types of abuse.

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. Appendix 1 defines neglect in more detail.

Child/Children includes everyone under the age of 18. The term **Young Person** throughout this policy refers to a **child**.

4. Equality statement

Some young people have an increased risk of abuse, and additional barriers can exist for some young people with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise young people's diverse circumstances. We ensure that all young people have the same protection, regardless of any barriers they may face.

We give special consideration to young people who:

- Have special educational needs or disabilities
- Are looked after children or have been in the past
- 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 abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff and Trustees in the school and is consistent with the procedures of the various Safeguarding Children's Partnerships that we work with. We very rarely have volunteers but the policy also outlines the procedures followed if or when we do. Our policy and procedures apply to education within our onsite provisions and off-site education within homes, libraries and other suitable locations that have been risk assessed.

5.1. All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff policies (code of conduct, social networking policy, mobile phone usage policy, whistleblowing policy), the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to young people who go missing from education
- The early help 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 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 Peer on Peer abuse, Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM) and radicalisation
- Mental health problems sometimes being an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

As a school, we have a pivotal role to play in multi-agency safeguarding arrangements and will work with the safeguarding partnerships to safeguard and promote the welfare of children which may include identifying and responding to their needs. The three safeguarding partners within each borough are the safeguarding partnership, a clinical commissioning group and chief officer of police for an area within the borough.

5.2. The Designated Safeguarding Lead (DSL)

Our DSL is Lotta Jones, Designated Safeguarding Lead. The DSL takes lead responsibility for child protection and wider safeguarding. The DSL can be contacted on 020 7377 0280 ext 606 or lotta.jones@tcw.org.uk

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

If the concern is immediate, please call the emergency services on 999, or if you want to make a referral to social care, use the number/s below for the borough where the young person lives. You will be able to discuss your concern with a social worker.

- City of London and Hackney 020 8356 5500
- Haringey 020 8489 4470
- Islington 020 7527 74 00
- Lewisham 020 8314 6660
- Southwark 020 7525 1921
- Tower Hamlets 020 7364 5601 / 5606

When the DSL is absent, Jurita Bennett, Assistant Head and Deputy Designated Safeguarding Lead (DDSL). Jurita can be contacted on 020 7377 0280 ext 603 or jurita.bennett@tcw.org.uk. If the DSL and DDSL are not available, Adam Dalton, Headteacher, will act as cover. The out of hours Safeguarding Lead is Adam Dalton, Headteacher. Adam can be contacted on 020 7377 0280 ext 601 or adam.dalton@tcw.org.uk

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 young people
- Refer suspected cases, as appropriate, to the relevant body (children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

In addition, the DSL helps promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that students (including those with a social worker) are experiencing, or have experienced, with teachers and other staff. This is done by, for example:

- making sure that staff know who these students are and maintain a culture of high aspirations for them
- supporting teaching staff to identify the challenges that these students may face and the additional academic support and adjustments that they could make to best support them

The DSL will also keep the Headteacher informed of any issues, and liaise with safeguarding partners, case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in their job description.

5.3. The Trustees

The board of Trustees will approve this policy at each review, and hold the Headteacher to account for its implementation.

The board of Trustees will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Trustee with safeguarding responsibilities is Sue Clark. Sue is also the current Chair of Trustees. She can be contacted on 020 73770280.

The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher or CEO (see appendix 3).

5.4. The Headteacher

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

- Ensuring that all staff and volunteers are informed of this policy as part of their induction
- 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
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer (see appendix 3)

5.5. Dual roll main institutions

The safeguarding responsibility for dual roll students falls to the main school. When working with dual roll students, TCW is usually the subsidiary school, therefore TCW are responsible for providing safeguarding information to the DSL at the main institution to enable them to follow their own institution's safeguarding policies and procedures.

6. Confidentiality

All staff members and volunteers have a legal duty to report safeguarding concerns. In order to effectively safeguard students in our care, they must:

- Share information in a timely manner as this is essential to effective safeguarding
- Only share information on a 'need-to-know' basis, however consent is not needed to share information if a child is suffering, or at risk of, serious harm
- Never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests

6.1. Confidentiality and data protection

When done for the purposes of protecting the welfare of and safeguarding a young person, the Data Protection Act 2018 and GDPR do not prevent the sharing of information. The legislation also permits us to withhold student information where there is a risk of serious harm, e.g. we would not share the contact details of a student who is in a

refuge to an abusive parent/carer. Having the agreement of the young person and parent/carer to share information is recommended, but when consent to do so is not sought, the reasons for this should be clearly recorded. We will follow the [DfE guidelines](#) on data sharing and will seek independent legal advice if needed. [Working Together to Safeguard Children](#) recommends using GDPR lawful bases for information sharing, i.e. legal obligation (the exercise of official authority) or public task (a task performed in the public interest), when making decisions about appropriate information sharing. We may also share data where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this

Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:

- Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law.
- Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share.
- Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us.

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

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

7.1. If a child is in immediate danger

Discuss your concerns with the DSL (see section 5.2), Lotta Jones. Lotta can be contacted on 020 7377 0280 ext 606 or lotta.jones@tcw.org.uk. If the DSL is not available, speak with the DDSL, Jurita Bennett, on 020 7377 0280 ext 603 or jurita.bennett@tcw.org.uk. The DSL will make the relevant referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. The DSL will follow [NSPCC guidance](#) about when to contact the police.

It is important to note that **anyone can make a referral**. <https://www.gov.uk/report-child-abuse-to-local-council> If you make a referral directly without discussing with the DSL, ensure that you speak to the DSL ASAP after you have made the referral. You will also need to report the concerns and referral on TCW's reporting software, [MyConcern](#).

For further information about the referral making process in specific boroughs, and to find their referral forms, please select the below borough where the student lives, you will be directed to their Safeguarding Children Partnership.

[City and Hackney](http://www.chscb.org.uk) <http://www.chscb.org.uk>

[Haringey](https://haringeyscp.org.uk/) <https://haringeyscp.org.uk/>

[Islington](https://www.islingtonscb.org.uk/Pages/default.aspx) <https://www.islingtonscb.org.uk/Pages/default.aspx>

[Lewisham](https://www.safeguardinglewisham.org.uk/lscp) <https://www.safeguardinglewisham.org.uk/lscp>

[Southwark](https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/) <https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/>

[Tower Hamlets](http://www.childrenandfamiliestrust.co.uk/the-lscb/) <http://www.childrenandfamiliestrust.co.uk/the-lscb/>

7.2. 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
- 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
- Discuss the disclosure with the DSL
- 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. Log this on MyConcern safeguarding software by the end of that day and never later than 24 hours after the conversation took place
- If you need to make a referral to children's social care and/or the police directly (see 7.1), tell the DSL as soon as possible that you have done so

7.3. If you discover that FGM has taken place or a student is at risk of FGM

The Department for Education's 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'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4.

Any teacher who discovers that an act of FGM appears to have been carried out on a **student under 18** must immediately and personally report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Call 999.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow the safeguarding procedures of the area where the student lives, detailed below.

Any member of staff who suspects a student is *at risk* of FGM or discovers that a **student age 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow the safeguarding procedures of the partnerships listed below.

[City and Hackney](http://www.chscb.org.uk) <http://www.chscb.org.uk>

[Haringey](https://haringeyscp.org.uk/) <https://haringeyscp.org.uk/>

[Islington](https://www.islingtonscb.org.uk/Pages/default.aspx) <https://www.islingtonscb.org.uk/Pages/default.aspx>

[Lewisham](https://www.safeguardinglewisham.org.uk/lscp) <https://www.safeguardinglewisham.org.uk/lscp>

[Southwark](https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/) <https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/>

[Tower Hamlets](http://www.childrenandfamiliestrust.co.uk/the-lscb/) <http://www.childrenandfamiliestrust.co.uk/the-lscb/>

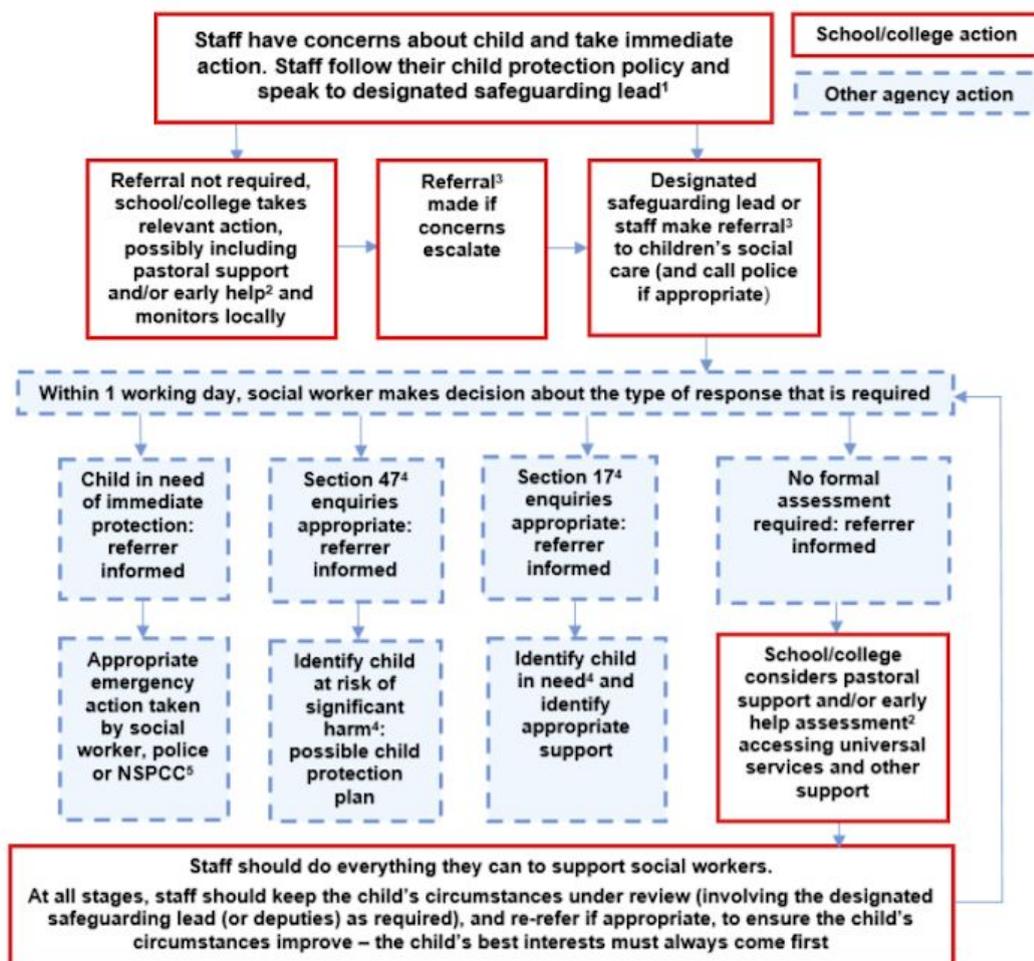
7.4. If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 below, illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Figure 1: procedure where there are concerns about a child (no immediate danger)



1 In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance. 2 Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process. 3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children. 4 Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children. 5 This could include applying for an Emergency Protection Order (EPO).

Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

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

Referral to children's social care or police

If it is appropriate to refer the case to 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 (see section 7.1), you must tell the DSL as soon as possible and follow up with a report on Myconcern safeguarding software, including the referral made.

Children's social care 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 children's social care 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 contact children's social care and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

7.5. If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Follow this up with a concern report on Myconcern safeguarding software.

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 children's social care team.

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 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

[City and Hackney](http://www.chscb.org.uk) <http://www.chscb.org.uk>

[Haringey](https://haringeyscp.org.uk/) <https://haringeyscp.org.uk/>

[Islington](https://www.islingtonscb.org.uk/Pages/default.aspx) <https://www.islingtonscb.org.uk/Pages/default.aspx>

[Lewisham](https://www.safeguardinglewisham.org.uk/lscp) <https://www.safeguardinglewisham.org.uk/lscp>

[Southwark](https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/) <https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/>

[Tower Hamlets](http://www.childrenandfamiliestrust.co.uk/the-lscb/) <http://www.childrenandfamiliestrust.co.uk/the-lscb/>

Please see more information regarding Preventing radicalisation in Appendix 4.

7.6. Myconcern reporting system

Any safeguarding concern that a member of staff has in relation to a student should be reported via the Myconcern safeguarding software. This can be accessed by any member of staff using <https://www.myconcern.education/Account/Login>

Staff receive training on how to use the software, when and how to use a body map and how to write reports.

7.7. Concerns about a staff member

If you have concerns about a member of staff, speak to the Headteacher or DSL. If you have concerns about agency staff, speak to the Headteacher.

If you have concerns about the Headteacher or CEO, speak to the Chair of Trustees. The Headteacher/Chair of Trustees will then follow the procedures set out in appendix 3.

7.8. Allegations of abuse made against other students - peer on peer abuse

We recognise that young people are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Most cases of students hurting other students will be dealt with under our 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 indicates:

- Bullying, including cyberbullying
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration, sexual assault, indecent exposure
- 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
- Upskirting, which is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- Initiation/hazing type violence and rituals
- Students being forced to use drugs or alcohol
- Sexting, which is the production and/or sharing of sexual photos and videos of and by young people under the age of 18, including nude or nearly nude images and sexual acts. TCW follows the guidelines found in the [UKCIS guidance on sexting in schools and colleges](#). Please note that sexting does not include the sharing by adults of sexual photos and videos of under-18 year olds as this is a form of child sexual abuse and is referred to the police

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

- You must tell the DSL and record the allegation, but do not investigate it yourself
- The DSL will contact the 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 young people involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent. Students will follow tailored PSHE schemes of work that aim to equip them with the key skills to deal with difficult situations independently
- Ensuring students know they can talk to staff confidentially by providing them with a student safeguarding policy, discussing at their initial meeting about communicating safeguarding concerns with their teacher and confirming that teachers need to discuss with the DSL disclosures, allegations and safeguarding concerns
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy

7.9. Concerns about Serious Violence

All staff should be aware of indicators, which may signal that a young person is at risk of or are involved with serious violent crime. These may include:

- Increased absences from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance at school
- Signs of self-harm or a significant change in wellbeing
- Sign of assault or unexplained injuries
- Unexplained gifts or new possessions could indicate that a young person has been approached by or are involved with individuals associated with criminal networks or gangs

See [Advice to schools and colleges on gangs and youth violence](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) for further information.

8. Notifying parents

Where appropriate, we will discuss any concerns about a young person with the young person's parent/carer. The DSL will normally do this in the event of a suspicion or disclosure.

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

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

In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

9. Mobile phones and cameras

If for any reason you need to take a student's photo, please ensure we have permission from them and their parents, and make sure it is done in the context of their work. We often require evidence of students' work to ensure progress and to celebrate their efforts. Keep your student's data safe (photos, documents, videos etc.) and make sure students are securing their data as well. Have a robust safety procedure. Do not take any visual images of your students if it is not part of their work. Delete any information if no longer needed.

There are school cameras available for all staff to use if you know you will need to take photos of your student(s) working for school purposes. Please contact the Creative co-ordinator to book out a camera.

It is preferable not to use your mobile phone to take photographs of a student. If, however, this is necessary please ensure that the photo is not uploaded to any personal Cloud account. Instead, upload it to the TCW Google Drive or send it as an email to your work email copying in the Creative co-ordinator. The image should be instantly and fully deleted off your device.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

10. Online safety

The use of technology is a significant component of many safeguarding issues and often provides the platform that facilitates harm, for example in the areas of child sexual exploitation, radicalisation and sexual predation. We recognise that an effective approach to online safety empowers us to protect and educate our whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and

- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

It is essential that our students are safeguarded from potentially harmful and inappropriate online material, including when they are taught remotely. We have appropriate filters in place and use the monitoring system GoGuardian to track and follow up on any concerning internet use, both when students are at school and when using their school accounts at home. All remote lessons are recorded in order for students and staff to be safeguarded.

All staff complete online safety training as part of their induction and the refresher training taking place at least every two years. They are also made aware of and agree to follow the staff Code of Conduct as part of their induction. In addition, they read the Mobile phone usage and Social networking policies.

11. Complaints and concerns about school safeguarding practices

11.1. Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3). Please refer to TCW's Dealing with Allegations policy for further details.

Concerns or allegations may be brought to the attention of a member of staff in various ways. A child might make a disclosure directly about another member of staff; a parent or other adult may report a concern about what they say they have seen or have been told by a child; or the member of staff might observe an event or behaviour that causes them concern. The protection of students from abuse is the responsibility of all staff, and the DSL ensures that staff and students are aware of how to report concerns of abuse and neglect. Information about how to report concerns of abuse and neglect are given to staff at induction and students and parents at their initial meeting with TCW.

Any allegation or abuse of a student by a teacher must be reported directly to the DSL and/or Headteacher.

11.2. Other complaints

A Partner who is dissatisfied with our services or who has made a comment/asked a question and is not happy with our response may wish to make a complaint. Those wanting to make a complaint may, for instance, raise it by:

- Writing to the manager of the area concerned
- Talking to the Teaching and Learning Officer or Education Support Officer
- Talking to a member of the teaching staff
- Writing to the Headteacher or Chief Executive

TCW will treat each of these as acceptable routes for raising concerns and complaints about the experience of our Partners and will treat with equal seriousness any complaint received, regardless of the route chosen.

The procedures for dealing with complaints are designed to ensure that:

- All complaints are treated seriously and with discretion.
- Appropriate investigations are carried out at management level. An investigating officer will be appointed by the Headteacher/ Chief Executive.
- Complainants can be sure that their concerns are being treated in confidence.
- Complainants receive initial and regular feedback about the progress of their complaint.
- Members of staff feel able to pass on complaints about TCW to the appropriate managers.
- All complaints are properly documented and are dealt with as quickly as is possible.
- All records of complaints will be evaluated to identify TCW improvements.
- There are rights of appeal. This includes complainants and any members of staff who may be the subject of a complaint.
- Information about TCW commitment and procedures will be available to staff and service users through a range of documents and locations.

Please refer to TCW's *Compliments, comments and complaints* policy for further details.

11.3. Whistle-blowing

Whistleblowing is when the employee knows, or suspects, that there is some wrongdoing occurring within the organisation and alerts the employer or the relevant authority accordingly.

Although this list is not exhaustive, examples of situations in which it might be appropriate for an employee to report a wrongdoing include:

- A breach, or potential breach of health and safety legislation
- Financial irregularities
- Harassment of a colleague, client or other individual
- Damage to the environment
- The committing of a criminal offence
- Professional malpractice
- Abuse of a client

Where an incident of serious concern is alleged, the person making the allegation must report this directly to the CEO / Headteacher. They will be assured that appropriate enquiries will be made to establish the nature / reality of the incident and that such enquiries will be carried out discreetly and in confidence.

Wherever possible, the identity of the person reporting the allegation of wrongdoing will be kept anonymous.

The person who has raised the issue of a wrongdoing will be kept informed of any investigation that is taking place. They will also be kept informed of the outcome of the investigation. It might not always be appropriate to tell them the details of any action that is taken, but they will be informed if action is being taken.

Where preliminary enquiries show that further investigations need to be made, then the CEO / Headteacher will inform the staff member against whom the allegations have been made.

Where the alleged offence is of a serious nature, the following action will be taken:

- The staff member at the centre of the allegation may be suspended immediately on full pay pending the outcome of the investigation. The staff member will be informed of the necessity for this action and will be assured that, at this point, there is no implication of guilt.

You should always, in the first instance, talk to the CEO / Headteacher about a potential wrongdoing. If you are not satisfied with the response you are entitled to contact a relevant external body to express the concerns. In doing this you should:

- Have a reasonable belief that the allegation is based on correct facts
- Not be making any personal gain from the revelations
- Making the disclosure to a relevant body

A "relevant body" is likely to be a regulatory body (e.g. the Health and Safety Executive, Safeguarding Partnership or the Financial Services Authority).

Please refer to TCW's Whistleblowing policy for further details.

Further guidance on whistleblowing can be found via NSPCC's [Whistleblowing advice line](#). Staff can call 0800 028 0285 – the line is available from 8:00AM to 8:00PM Monday to Friday and email help@nspcc.org.uk

12. Record-keeping

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.

Non-confidential records will be easily 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.

Safeguarding records relating to individual young people will be retained for a reasonable period of time after they have left the school.

Records kept after September 2018 will be documented and stored on 'MyConcern' Software. The software requires the DSL to invite specific people to view safeguarding information when necessary and only if deemed to be in the

best interests of the young person. Information is shared with other agencies when there is a need to share safeguarding information to effectively safeguard. If information needs to be shared with another agency, a secure email would be sent or it would be shared through 2 password protected logins on 'MyConcern' software.

Records held prior to September 2018 will be held electronically within a confidential safeguarding folder. The DSL, DDSL and Headteacher will be the only people to have access to these files. Records are kept secure through having Google Drive logins that are password protected. Records are kept confidential and are not printed unless necessary. They are then shredded.

12.1. Record keeping and data protection

The GDPR is based on data protection principles that our school must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- Papers containing confidential personal data must not be left on office and classroom desks, on staff room tables, pinned to notice/display boards, or left anywhere else where there is general access
- Where personal information needs to be taken off site, staff must sign it in and out from the school office
- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils or trustees who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 6.1)

12.2. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

We will hold records in line with our records retention schedule.

Figure 2, Safeguarding Data record keeping retention

5.7 Safeguarding					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Child protection files should be passed on to any new school the child attends or retained if they leave education.	Yes		Closure + 35 years	DESTROY unless legal action is pending	
Safeguarding reports, disclosures, medical records of pupils implicated	Yes		Closure + 35 years	DESTROY unless legal action is pending	
Safeguarding concerns involving an adult or concerns of an adult's behaviour around children.	Yes		Closure + 50 years	DESTROY unless legal action is pending	If the adult is a staff worker, volunteer or contractor we retain their personnel file for the same amount of time. We will keep records for the same amount of time regardless of whether the allegations were unfounded. However if you find that allegations are malicious we will destroy the record immediately.

Please refer to TCW's Data Protection Policy for further details.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

13. Training

13.1. All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from safeguarding children partnerships.

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

Staff will also receive regular safeguarding and child protection updates (for example, through emails, the safeguarding section within the newsletter and staff meetings) as required, but at least annually.

We very rarely have volunteers, but if and when we do, they will receive appropriate training.

13.2. The DSL and DDSL

The DSL and DDSL 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.

13.3. Trustees

The Trustee with safeguarding responsibilities receives Designated Safeguarding Lead training which is updated every 2 years to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

Additionally, all Trustees will complete relevant Safeguarding training to ensure sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

13.4. Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

Please see the safer recruitment policy for further information.

13.5. Staff who have contact with students and families

All staff who have contact with young people and families will have supervisions which will provide them with support, coaching and training, promote the interests of young people and allow for confidential discussions of sensitive issues.

13.6. Opportunities to teach young people about safeguarding

Relevant safeguarding issues will be taught within PSHE lessons, this may be included within Relationship Education (RE) for KS1 and 2 students and Relationship and Sex Education (RSE) for KS3, 4 and 5 students.

14. Monitoring arrangements

This policy will be reviewed **annually** by the TCW DSL with discussion from Chrissie Roberts, CEO, Adam Dalton, Headteacher and Out of hours DSL and Jurita Bennett, DDSL and Assistant Head. At every review, it will be approved by the full board of Trustees. Additional policy reviews may be necessary due to changes in statutory guidance.

15. Links with other policies

[This policy links to the following policies and procedures that can be accessed on the TCW website:](#)

- Anti- Bullying/ Cyber-Bullying
- Attendance
- Behaviour and Conduct
- British Values
- Complaints
- Data Protection including privacy notice
- Drug Awareness
- E-safety
- Equality and Diversity
- First aid and Medication
- Health and Safety
- Lone Worker
- PSHE- to include RE and RSE
- Risk Assessment
- Special Education Needs and Disability

- Spiritual, Moral and Social Education
- Student Friendly Safeguarding
- Whistleblowing

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education and additional guidance noted in Legislation and statutory guidance.

Appendix 1: types of abuse

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

Staff should be aware and consider that:

- safeguarding incidents and/or behaviours can be associated with factors outside of school and occur outside of that environment
- young people can be at risk of abuse or exploitation in situations outside their families. These extra-familial harms can take different or multiple forms, and can include serious youth violence and sexual and criminal exploitation

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 young people. 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 young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

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 young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people 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 young people.

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.

Indicators of abuse

The following guidance is intended to help all staff who come into contact with children. It should not be used as a comprehensive guide, nor does the presence of one or more factors prove that a child has been abused, but it may however indicate that further enquiries should be made.

The following factors should be taken into account when assessing risks to a child. This is not an exhaustive list:

- An unexplained delay in seeking treatment that is obviously needed;
- An unawareness or denial of any injury, pain or loss of function;
- Incompatible explanations offered or several different explanations given for a child's illness or injury;
- A child reacting in a way that is inappropriate to his/her age or development;
- Reluctance to give information or failure to mention previous known injuries;
- Frequent attendances at Accident and Emergency Departments or use of different doctors and Accident and Emergency Departments;
- Frequent presentation of minor injuries (which if ignored could lead to a more serious injury);
- Unrealistic expectations/constant complaints about the child;
- Alcohol misuse or other substance misuse;
- A parent's request to remove a child from home or indication of difficulties in coping with the child;
- Domestic violence and abuse;
- Parental mental ill health;
- The age of the child and the pressures of caring for a number of children in one household.

Appendix 2: safer recruitment and DBS checks – policy and procedures

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.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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 any additional checks, as appropriate, including

- o using the Home Office's guidance on [criminal records checks for overseas applicants](#) in regards to candidates who have lived or worked outside of the UK, so that relevant events that occurred outside of the UK can be considered, and
- o those which may include information about candidates past conduct, for example, by checking documents issued by overseas teaching authorities

The above evidence will be considered alongside information which we obtain through other safer employment checks.

- As an Independent school, check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We will seek references on all short-listed candidates, including internal candidates, before interviews. We will scrutinise these and resolve any concerns before confirming appointments.

As we work with children younger than 8 years old, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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 young people
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with young people
- 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

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

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

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

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 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 young people

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.

Volunteers

It is very rare that we have volunteers, however if and when we do, 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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with young people on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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

Trustees

- All Trustees will have an enhanced DBS check and section 128 check, which won't include barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The Chair of the Trustees will have their DBS check countersigned by the Secretary of State.

All Trustees will also have the following checks:

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise students on work experience

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

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

Appendix 3: allegations of abuse made against staff

This section of the policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

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

It applies regardless of whether the allegation relates to the personal or professional life of the staff member/volunteer.

We will deal with any allegation of abuse against a member of staff or volunteer quickly and in a fair and consistent way that provides effective child protection, while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

In all cases of such allegations being made, we will contact the Tower Hamlets Local Authority Designated Officer (LADO), regardless of whether the student making the allegation resides there. The Tower Hamlets LADO's contact details are as follows – telephone: 020 7364 0677, email: LADO@towerhamlets.gov.uk

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

Procedure for dealing with allegations

In the event of an allegation that current staff has acted in any of the ways detailed above, this should immediately be reported to the Headteacher and/or Designated Safeguarding Lead. If the Headteacher or CEO is the subject of the allegation, it should be reported to the Chair of Trustees and/or Safeguarding Trustee. The Headteacher (or Chair of Trustees as outlined above) will act as the case manager and take the following steps:

- Try to establish the practical details of the time/s, date/s and location/s of the alleged abuse, as well as the name of potential witnesses. Please note that these initial enquires are not carried out in order to establish guilt or innocence and the case manager will not interview victims, witnesses or the person/s that the allegation is in relation to
- Report and discuss the allegation with the LADO as soon as possible and no later than within 1 working day of the allegation being made. The LADO will make referrals to the Multi Agency Safeguarding Hub (MASH) as needed. If it is not possible to contact the LADO, the case manager should contact MASH directly. However, if the accused individual is deemed to be an immediate risk to young people or there is evidence of a possible criminal offence, the case manager may consider it necessary to involve the police *before* consulting the LADO. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police
- Consider as part of the initial discussion with the LADO, who should notify the parents/carers of the young person who has allegedly been abused, of the allegation and how this should be done. As part of informing parents/carers, they will also be advised regarding the requirement to maintain confidentiality about any allegations made against staff while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice
- If it is agreed with the LADO (and with the police and children's social care where necessary) that the accused individual can be informed of the allegation, this should be done as soon as possible. The case manager will only share such information with the individual as has been agreed with those mentioned above
- Ensure that the school is represented at the Multi-agency Allegation against Staff and Volunteers meeting if such a meeting is convened by the LADO
- Carefully consider whether suspension of the individual from contact with young people at the school is justified. Depending on the nature of the allegation, and if the LADO, and police and/or children's social care services where appropriate, have no objections to the accused individual continuing to work during the investigation, alternative arrangements can be put in place
- If immediate suspension is considered necessary, agree and record the rationale for this with the LADO. 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, agree and record the justification for this with the LADO. Agree with the LADO 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 LADO 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 consider what other support is appropriate
- Keep the parents or carers informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that has harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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 National College for Teaching and Leadership.

Where the police are involved, wherever possible, the Headteacher/Chair of Trustees 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.

Suspension

Suspension 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 it 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.

- An employee may be suspended from duty on full pay at any time in cases of gross misconduct or where there is a risk to the safety of colleagues, students or to the employee themselves, or a risk to the contamination of evidence. Suspension is not a disciplinary penalty and is a neutral act. Suspension will not be automatic and consideration will be given to alternatives to remove an individual from the workplace.
- In some cases, it may be appropriate for the employee to take a short period of leave on full pay (i.e. being asked to remain at home with no work having been allocated). Any period of such leave will not be recorded on file as part of any disciplinary record. This may include prior to an investigatory interview being held. In such cases, the company will normally seek advice from the HR Employee Relations team. It is important to understand that this type of leave and suspension from duty are not disciplinary sanctions.
- The decision to suspend will normally be made following advice provided by the HR Employee Relations team. This decision will be made at the outset, either as a result of the initial exploratory interview, during or following the formal investigation.
- Staff will be notified in writing of any decision to suspend and should be advised to contact their Trade Union representative and be provided with the contact details for a link member of staff to keep in contact throughout. The formal letter of suspension should be handed to the employee or sent by Recorded Delivery, to ensure proof of receipt.
- In cases where it is known that the employee holds similar or equivalent employment(s) with other companies, consideration should be given as to whether the suspension from duty should be extended, for example, when dealing with matters raised under the Dealing with Allegations policy. In such cases, advice should be sought from the HR Employee Relations Team.
- Where suspension relates to a safeguarding allegation, the guidance in the Dealing with Allegations Policy must take precedence over this policy and procedure.
- Only the CEO may end a period of suspension following advice from the Headteacher and Human Resources.

Allegations against agency staff

If an allegation is made against supply staff who is not employed by TCW, but provided through an agency, we will ensure that the allegation is dealt with properly.

We won't decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Trustees will discuss with the agency whether it's appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the investigation is carried out. We would expect the Agency to be fully involved and co-operate in any enquiries, but would usually take the lead as the agency wouldn't be able to collect the necessary information. Issues such as information sharing will be addressed in an allegations management meeting to ensure previous concerns or allegations known to the agency are taken into account.

When using an agency, we inform them of our process for managing allegations, including inviting the agency's HR manager or equivalent to meetings and keeping them up to date with information about your policies.

Definitions for outcomes of allegation investigations

The following definitions should be used when determining the outcome of investigations of allegations:

- **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
- **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)

Timescales

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

Specific actions

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 case manager and the school's personnel adviser will discuss with the LADO whether to make a referral to

- a) the DBS for consideration of inclusion on the barred list, and
- b) the appropriate regulatory agency, for example, if the individual concerned is a teacher, the NCTL to consider prohibiting the individual from teaching

It is a legal requirement to make a referral to the DBS if the school believes that the individual concerned has engaged in conduct that has harmed, or is likely to harm, a young person (including inappropriate sexual conduct), or if the person otherwise poses a risk of harm to a young person.

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 young person or young people who made the allegation, if they are still attending the school.

False or malicious allegations

If an allegation is shown to be false or malicious, the case manager will inform the individual concerned, orally and in writing, that no further action will be taken under disciplinary or child protection procedures. Appropriate support should be offered. Consideration should be given to the possibility that the young person who made the allegation may be experiencing abuse elsewhere.

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO 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.

New information

If any new information emerges after the conclusion of a case, which is relevant to the case or its outcome, we will contact the LADO without delay.

Confidentiality

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, as well as 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 young person/young people 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. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of actions taken, decisions reached and the justification for these

Unless an allegation or concern is found to have been false, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the LADO 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

A more detailed account of actions the school and LADO will take to deal with allegations of abuse against staff can be found in Keeping Children Safe in Education 2019 and the Tower Hamlets Safeguarding Children Partnership's LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce and Supplementary guidance for schools and education settings on managing allegations of abuse against staff members.

Appendix 4: specific safeguarding issues and children potentially at greater risk of harm

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

Children may need a social worker due to safeguarding or welfare needs, such as abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm and cause them to face educational disadvantage due to barriers to attendance, learning, behaviour and mental health.

Local Authorities should share with TCW that a student has a social worker and the DSL will hold and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on:

- safeguarding, e.g. responding to unauthorised absence or the student missing education, and
- the promotion of welfare, such as provision of pastoral and/or academic support

Children requiring mental health support

Traumatic and adverse childhood experiences can have a great impact on a young person's mental health, behaviour and education. As such, mental health problems can sometimes be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will flag any mental health concerns to the DSL, without making mental health 'diagnoses'. A decision will be made as to whether the TCW school counsellors are best placed to offer support to the student, or whether a referral should be made to outside agencies such as CAMHS or children's social care.

Children with special educational needs and disabilities

Students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can also exist when recognising that they are being abused or neglected. These can include:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's SEN/disability
- being more prone to peer group isolation than other students
- the potential for students with SEN and disabilities to be disproportionately impacted by for example bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

All students at TCW have Individual Education Plans and Risk Assessments. Students with SEN and disabilities also have Educational, Health and Care Plans (EHCP). These are made available to staff before starting to work with an individual student and supports them in apprehending their student's strengths and needs. Working mainly 1-1 with students also enables staff to get to know their student and to recognise changes in behaviour and mood on an individual basis.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. When this is the case for a TCW student, we will provide emotional support, while ensuring that we do not discuss with them anything that may affect the court case. We will also provide them with the guides published by the HM Courts and Tribunals for [5-11-year olds](#) and [12-17 year olds](#) as appropriate.

Making child arrangements via the family courts following separation can be stressful for, and entrench conflict in families. Parents may find using [this tool](#) helpful <https://helpwithchildarrangements.service.justice.gov.uk/>

Children missing from education

Children going missing, particularly repeatedly, can act as a vital warning sign of abuse and neglect. This group of young people are at risk of becoming victims of sexual abuse or exploitation and child criminal exploitation. Going missing can indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

There are many circumstances where a child may become missing from education, but some young people are particularly at risk. These include young people who:

- Are at risk of harm or neglect
- 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 young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect and to help prevent the risks of them 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 going missing, 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 children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Children with family members in prison

When a family member of a student is in prison, we will identify and refer the student to available specialist support services, as well as consider whether in-school services such as counselling or working with the Intervention team would be beneficial for them. This is especially important as these children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use information from the National Information Centre on Children of Offenders ([NICCO](#)), as well as seek advice from the Safeguarding Children partnership in the area where the student lives, in order to inform our decisions about how to support them in the best way possible.

Child Exploitation

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse. They occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual or criminal activity. This power imbalance can be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Sometimes the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time. It can also range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and is sometimes, but not always, accompanied by violence or threats of violence. Both types of exploitation can take place in person and/or online.

It is important to remember that victims may have been exploited even when the activity appears consensual.

CCE

Some of the following signs may be indicators of CCE:

- young people who appear with unexplained gifts or new possessions;
- young people who associate with other young people involved in exploitation;
- young people who suffer from changes in emotional well-being;
- young people who misuse drugs and alcohol;
- young people who go missing for periods of time or regularly come home late; and
- young people who regularly miss school or education or do not take part in education.

CSE

CSE is a type of child sexual abuse. Young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. **CSE is never the victim's fault, even if there is some form of exchange.**

Child sexual exploitation does not always involve physical contact. It can also occur through the use of technology, young people may for example be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. Like all forms of child sex abuse, child sexual exploitation:

- can affect any young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The above CCE indicators can also be indicators of CSE, as can:

- young people who have older boyfriends or girlfriends
- young people who suffer from sexually transmitted infections or become pregnant;

We recognise that CSE is a high profile issue both nationally and locally and aim to prevent in the following ways; support young people to develop confidence and build resilience, raise awareness and understanding of what CSE is, understand the risks of CSE and to spot the warning signs for themselves and also their friends and peers and by doing so keep safe.

If prevention is not possible we aim to identify young people who are at risk of, or being exploited very early. Early intervention is key to effectively working with the young person to prevent or reduce the level of risk. Once they have been groomed some young people will find it difficult to withdraw from their abusers and we need to contribute to helping to protect them. Some young people feel that they are in a relationship with these people. We commit to working with our inter-agency partners to safeguard and protect young people.

Effective partnership working across statutory and voluntary agencies is crucially important in protecting young people at risk of or who have experienced child sexual exploitation. Much of the work will be through scheduled PSHE lessons, including our Sex and Relationship Education (SRE) work. This includes a scheme of work and workshops from Sexpression. We will also seek to tailor specific student needs when identifying risks and connecting young people with relevant partners such as WUSH (wise up to sexual health), Young Hackney, Safer London, NSPCC and others that we may deem suitable.

An important part of educating our young people is focussing on what is a healthy relationship and issues of consent. This will also target potential abusers at an early age with the intention of helping to shape their attitudes towards others.

We want to have a culture where the welfare of young people is actively promoted and staff and students are vigilant and in turn will feel listened to and safe.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the children's social care team and the police, if appropriate.

County lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Young people can be targeted and recruited into county lines in a number of locations including schools, children's homes and care homes. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any young person (male or female) under the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

These young persons can easily become trapped as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. If we suspect that a student is at risk of or is involved in county lines, a safeguarding referral will be considered. We will also consider making a referral to the National Crime Agency's National Referral Mechanism and look into the availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic abuse continues to be a prevalent risk factor identified through children social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others such as the non-abusive parent.

Domestic abuse

The cross-government definition of domestic violence and abuse is 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality'. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can be psychological, physical, sexual, financial, emotional etc. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence. Exposure to domestic abuse and/or violence has a serious, long lasting emotional and psychological impact on young people. In some cases, they may blame themselves for the abuse or may have had to leave the family home. In addition to the context of their home life, young people may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others such as the non-abusive parent. Domestic abuse can also occur within young people's personal relationships.

If domestic abuse takes place in a student's family home, or they experience it outside of the home environment, we will make a referral to Social Care. In addition, we will provide in-school counselling as appropriate.

We are part of Operation Encompass, which helps police and schools work together to provide emotional and practical help to children who have witnessed or experienced domestic abuse. The system ensures that if police are called to an incident of domestic abuse at the home of one of our students, or where they have directly experienced

domestic abuse, the police will inform the DSL before the student/s arrive at school the following day. This enables us to have up to date information about the student's circumstances and enables us to put appropriate support in place.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. In most cases a young person's homelessness takes place within the context of their families. However, we also recognise that in some cases 16 and 17 year olds could be living independently from them, for example if their family will no longer allow them to stay in their home. Different types of homelessness require different levels of intervention and support. We would initially make a referral to Social Care. In addition, the DSL and DDSL are aware of contact details and referral routes into the Local Housing Authorities in the areas our students are from, and such a referral may also be necessary.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of 'honour-based' abuse should be handled and escalated as abuse, regardless of the motivation.

If staff have a concern regarding a child that might be at risk of, or who has suffered from, 'honour-based' abuse, they should speak to the designated safeguarding lead (or DDSL). The DSL/DDSL will follow local safeguarding procedures for multi-agency liaison with police and children's social care.

FGM

The Department for Education's 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'.

FGM mandatory reporting duty for teachers

It is a statutory duty for teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Call 999. Those failing to report such cases will face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's DSL (or DDSL) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

We aim to stop FGM occurring through prevention strategies, which include:

- Maintain a robust attendance policy that does not authorise holidays, extended or otherwise.
- Ensure that FGM training is given for Child Protection leads and disseminated training for all staff at the front line dealing with the children.
- Designated Safeguarding Lead will engage in discussions with parents of children from FGM practicing communities.
- Ensure we deliver comprehensive PSHE lessons throughout the school.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to young people affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other young people about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social care in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

The above indicators and risk factors are not intended to be exhaustive.

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

To ensure that FGM is not taking place, the school may sensitively and informally ask children and their families about their planned extended holiday. Questions could include:

- Who is going on the holiday with the child?
- How long do they plan to go for and is there a special celebration planned?
- Where are they going?
- Are they aware that the school cannot keep their child on roll if they are away for a long period?
- Are they aware that FGM including Sunna is illegal in the UK even if performed abroad?

If the family is originally from a country where girls or women are circumcised and we suspect that a child is a victim of FGM we may ask the child the following:

- Do you think you have gone through this?
- Has anything been done to you down there or on your bottom?
- Do you want to talk to someone who will understand you better?
- Would you like support in contacting other agencies for support, help or advice?

Forced marriage

Forcing a person into a marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The following information is from [Government guidance on forced marriage](#) and [The right to Choose: Multi-agency statutory guidance for dealing with forced marriage](#).

The terms “honour crime” or “honour-based violence” or “izzat” embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour.

In transgressing this correct code of behaviour, the person shows that they have not been properly controlled to conform by their family and this is to the “shame” or “dishonour” of the family. It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/or collusion from family and/ community members. Victims will have multiple perpetrators not only in the UK; Honour-Based Violence can be a trigger for a forced marriage.

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Many young people will be living through their entire childhoods with the expectation that they will marry someone of their parents or other family members choosing. What needs to be communicated to all of those at risk is that forced marriage is a **CRIME** and that they have a fundamental human right to be able to choose their future spouse.

Some of the key motives that have been identified are:

- Controlling unwanted sexuality (including perceived promiscuity, or being lesbian, gay, bisexual or transgender) - particularly the behaviour and sexuality of women
- Controlling unwanted behaviour, for example, alcohol and drug use, wearing make-up or behaving in, what is perceived to be, a “westernised manner”
- Preventing “unsuitable” relationships, e.g. outside the ethnic, cultural, religious or caste group
- Protecting “family honour” or “izzat”
- Responding to peer group or family pressure
- Attempting to strengthen family links
- Achieving financial gain
- Ensuring land, property and wealth remain within the family
- Protecting perceived cultural ideals

- Protecting perceived religious ideals which are misguided
- Ensuring care for a child or adult with special needs when parents or existing carers are unable to fulfil that role
- Assisting claims for UK residence and citizenship
- Long-standing family commitments.

TCW Staff will receive training around forced marriage and the possible presenting symptoms/indicators which can also be found below.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL. Staff are made aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer (LADO)
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmw@fco.gov.uk
- Refer the student to an education welfare officer, pastoral teacher or school counsellor, as appropriate



Figure 3: Warning signs

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. It is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

TCW have a duty to prevent young people from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify young people at risk.

We will assess the risk of young people in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with the multiple safeguarding children partnerships we work with and local police forces.

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

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

Staff will be alert to changes in students' behaviour.

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

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

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

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including Behaviour policy, Curriculum policy, E-Safety policy, Preventing Extremism and Radicalisation policy, British Values policy and PSHE policy.

Key persons

The DSL is the TCW Prevent Safeguarding Lead and the Trustee with safeguarding responsibilities, Sue Clark, is the Prevent Trustee Lead. Her contact details can be found in 5.3 above. Kayleigh Golding is the school Prevent Curriculum Lead and can be contacted via email: kayleigh.golding@tcw.org.uk.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages, as well as confidential. The DSL and DDSL are aware of local procedures for making a Channel referral, as well as the possibility of being asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's lanyard, which details school expectations and safeguarding information on the back of the card. These expectations can be found in the document 'visitor expectations'. All visitors to our setting, including visiting speakers and workshop leaders, will be accompanied by a member of staff at all times.

If a staff member would like to invite a speaker/workshop leader, they must first inform the HR Co-ordinator, Amrit Riyat, and the DSL. All potential speakers or workshop leaders must ensure that our reference forms are completed and returned to the school, and provide a lesson plan/scheme of work for any session/s they will carry out with students. We also carry out the appropriate checks to ensure that any individual or organisation engaging with our students will not put them at risk of harm. Any necessary information will be added to the Single Central Record. We will not invite into the school any speaker who is known to disseminate extremist views or to seek to radicalise others.

We have exclusive use of all of our premises, but were any individuals or organisations to use these in future, the appropriate checks would be made to ensure they were not seeking to disseminate extremist views or seek to radicalise students or staff.

Non-collection of students

If a child is not collected at the end of the day and they cannot make their own way home, we will call all the relevant people connected to the young person. If we cannot get hold of the parent/ carer or alternative guardian within 1 hour of expected collection time, the DSL or DDSL will call the out of hours duty line for the relevant location for further advice. The incident may need to be recorded in terms of a referral to Children's Social Care.

Private fostering

Private fostering takes place when a person who is not the parent or person with parental responsibility, provides care and accommodation for a child who is under the age of 16 (or under 18, if disabled). It also occurs if a relative does the same outside of the child's own home. However, providing such care and accommodation is not considered private fostering if it takes place for less than 28 days and there is no intention for it to continue following that period of time.

These types of arrangements may come to the attention of school staff through the normal course of their interaction with their students. When they do, they should notify the DSL. The DSL will then inform children's social care, in order for them to ensure that the arrangement is suitable and safe.

Appendix 5: [Sexual Violence and Sexual Harassment](#)

Sexual violence and sexual harassment can occur between two young persons of any sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people.

Sexual violence includes:

- rape
- assault by penetration
- sexual assault - intentionally touching another person in a way that is sexual.

The 'Sexual violence and sexual harassment between children in schools and colleges' guidance defines sexual harassment as 'unwanted conduct of a sexual nature' that can occur online and offline.

Sexual harassment is likely to:

- violate a young person's dignity, and/or
- make them feel intimidated, degraded or humiliated and/or
- create a hostile, offensive or sexualised environment.

The above guidance describes [harmful sexual behaviours](#) as problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between young people can be considered harmful if one of the young people is much older, particularly if there is more than 2 years' difference in age or if one of the young people is pre-pubescent and the other is not.

Young people displaying harmful sexual behaviours have often experienced their own abuse and trauma.

When there has been a report of sexual violence, the DSL or a DDSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment will consider the:

- victim
- alleged perpetrator
- other children and, if appropriate, staff at the school or college.

Risk assessments will be recorded, either written or electronically, and kept under review. The designated safeguarding lead or a DDSL will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident(s), including considering whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children, for example if the alleged perpetrator is significantly older
- if the alleged incident is an isolated incident or a sustained pattern of abuse.

The starting point regarding any report will always be that sexual violence and sexual harassment are not acceptable and will not be tolerated at TCW.

Additional consideration will be given to:

- the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any young person will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them
- the proportionality of the response. Support and sanctions should be considered on a case-by-case basis.

Appendix 6: Covid-19

The DfE guidance 'Contingency framework: education and childcare settings' states that despite Covid-19 restrictions, there should be no change to local multi-agency safeguarding arrangements, which remain the responsibility of the 3 safeguarding partners:

- local authorities
- clinical commissioning groups
- chief officers of police

During the pandemic and its different stages, we will continue to follow the safeguarding requirements outlined in Keeping Children Safe in Education and Working Together to Keep Children Safe.

In line with the Contingency guidance, the TCW Child Protection and Safeguarding policy has been reviewed to ensure that it remains effective. This will be an ongoing process as needed. In addition, our staff handbook has been updated to reflect changes and issues teachers must consider when working remotely, including safeguarding.

We recognise that there has been an increase in the levels of need and vulnerability in our students during this time. The DSL and DDSL will continue working together with external agencies such as Social Care, as well as internal support teams such as Interventions, in order to safeguard our students as efficiently as possible.

At least one trained DSL or DDSL will be available, onsite or remotely, at all times throughout the pandemic. If it is not possible for a trained DSL (or DDSL) to be onsite, a senior leader will take responsibility for coordinating safeguarding on site.

Further information on how TCW will work with and ensure the safety of students and staff, can be found in the Health & Safety and Distance and Blended Learning policies.