



International
School of London

Child Protection and Safeguarding (Including Safer Recruitment, Allegations against staff and low- level concerns)

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Mission statement

Since 1972, we have established a welcoming and inclusive community. Our diverse cultures and languages drive all our learning experiences.

We nurture creativity and curiosity to stimulate deep thinking. We foster insight, compassion and resilience to enable us to play a meaningful part in a changing world.

Vision statement

We celebrate our stories, our worth and our purpose to make a difference in a shared world.

At the International School of London, we believe in:

Empowering students to maximise their learning opportunities and to fulfil their potential.
Actively integrating cultural diversity in the curriculum.
Creating inclusive, vibrant and innovative learning communities.
Offering a diverse and extensive international programme that supports personal, social and professional growth.

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Head of Child Protection and Safeguarding – (DSL)	Raul Rodriguez	rrodriguez@isllondon.org 02089925823
Deputy Safeguarding Leads	Jed Petsinger	ipetsinger@isllondon.org
	Kathryn Firebrace	kfirebrace@isllondon.org
	Claudine Hakim (acting DSL in absence of DSL).	chakim@isllondon.org
	Benoit Gouttenoire	bgouttenoire@isllondon.org
	Max Hull	mhull@isllondon.org
	Veuda Di Casola	mailto:vdicasola@isllondon.org
Hounslow -PYP- MYP Local authority designated officer (LADO) Call: 0208 583 5730	Grace Murphy	grace.murphy@hounslow.gov.uk0208 583 4933
Email: lado@hounslow.gov.uk	Sarah Paltenghi	sarah.paltenghi@hounslow.gov.uk 0208 583 3423
Ealing -Diploma	Emmanuel Adofu	asv@ealing.gov.uk (LADO phoneline) 020 8825 8930
Chair of governors	Amin Makarem	amakarem@isllondon.org
Channel helpline		020 7340 7264

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

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

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils maybe more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

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.

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

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

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

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

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carers has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

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

- Behaviour policy
- Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as: RSHE guidance revised July 2025 requires inclusion of building blocks of positive relationships, kindness in relationships, how to report concerns, and clear messaging that sexual violence and harassment are never the victim's fault.

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Understanding Safeguarding and Child Protection
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

-Searching

Searching can play a critical role in ensuring that schools are a safe environment for all pupils and staff.

1. It is a vital measure to safeguard and promote staff and pupil welfare, and to maintain high standards of behaviour through which pupils can learn and thrive.

2. Headteachers and staff have a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that the pupil may have a prohibited item listed below or any other item that the school identifies as prohibited.

- The list of prohibited items is:

- knives and weapons;
- alcohol;
- illegal drugs;
- stolen items;
- any article that the member of staff reasonably suspects has been, or is likely to be used:
 - to commit an offence, or
 - to cause personal injury to, or damage to property of; any person (including the pupil)
- an article specified in regulations:
 - tobacco and cigarette papers;
 - fireworks
- pornographic images.

4. Under common law, school staff have the power to search a pupil for any item if the pupil agrees. The member of staff should ensure the pupil understands the reason for the search and how it will be conducted so that their agreement is informed. The parent will then be notified of the search and the reasons behind this.

-Illegal and legal substances policy

Every school has a statutory responsibility to promote students' wellbeing and to investigate and address suspected possession, use and/or distribution of prohibited (illegal) substances (those controlled by the UK Misuse of Drugs Act 1971) and a number of legal substances including

alcohol and new psychoactive substances (NPS or 'legal highs'). The possession, use or supply of illegal drugs or any paraphernalia or equipment associated with the use of these drugs is not permitted in the school grounds at any time, at school sponsored events away from school nor must the use or after effects of the use of illegal drugs interfere with the orderly functioning of the school at any time.

All students and parents are therefore required to read this summary of the ISL drugs policy carefully.

- Any student supplying illegal drugs would be permanently excluded (expelled) from the school. Supplying means giving the drug to someone whether for payment or not – it is not restricted to selling the drug.
- The school recognises that there is a distinction between a student who supplies and/or is a regular user of illegal drugs and a student who may be using an illegal drug for the first time. Nonetheless any student using these drugs would potentially be liable to Permanent Exclusion..
- Any student suspected of being or having been under the influence of an illegal drug will be isolated from the rest of the school community immediately and parents/guardians will be informed. If the school has reason to suspect that a criminal offence has taken place the police will be contacted.
student should receive guidance and support from the school and recommend that the student be referred to an appropriate clinic or treatment centre for independent assessment. Refusal to cooperate in this process would lead to immediate review of the plan and the student's position in the school.
- Readmission following Fixed Term Exclusion would be at the school's sole discretion.
- ISL staff would typically inform the individual pupil's parents or guardians where alcohol, illegal drugs or potentially harmful substances are found.
- School staff can search students with their consent for any item

5.1 All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Receive level 2 training in Safeguarding and Child Protection.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online, signpost to Shore (Lucy Faithfull Foundation) as a resource for sexual behaviour concerns.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Behaviour Policy, the role and identity of the designated safeguarding lead (DSL) and deputies, online safety policy and the safeguarding response to children who go missing from education

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

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Head of Child Protection and Safeguarding (DSL)

The DSL is a member of the senior leadership team. Our DSL is Raul Pineiro Rodriguez. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL can also be contacted out of school hours if necessary: rrodriguez@islondon.org

When the DSL is absent, the deputies will act as cover.

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

Provide advice and support to other staff on child welfare and child protection matters

Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

Contribute to the assessment of children

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

Have a good understanding of harmful sexual behaviour

Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child

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

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

5.3 The Governing Board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead or, link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status, training and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

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

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).
- All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The Head of School

The headteacher is responsible for the implementation of this policy, including:
Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person overseeing the safe use of technology, mobile phones and cameras in the setting

6. Confidentiality

ISL's approach to confidentiality and data protection with respect to safeguarding is covered in our Data Protection Policy.

It should be noted that:

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

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

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

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

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

There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

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

If staff are in any doubt about sharing information, they should speak to the DSL (or deputies)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

All members of staff are expected to be aware of and follow this approach:



It may not always be appropriate to go through all five stages sequentially and if a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Children’s Social Work Services and/or the police. Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.** (information on contact details are shared further in this document)

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The DSL may seek advice or guidance from Area Education Safeguarding Adviser from the Education Safeguarding Team before making a decision regarding next steps. They may also seek advice or guidance from a social worker at the Front Door service.

All members of staff are made aware of the internal and local early help support services. Where a child is being offered or receiving early help support, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

In some circumstances staff may use reasonable force to safeguard children (using no more force than is needed). Additional care is required for children with SEND and/or medical needs and duties under the Equality Act 2010 must be considered. The school will plan positive and proactive behaviour support to reduce the need for restraint.

**Children Services in Hounslow:
(PYP, MYP)**

Telephone: 020 8583 6600 option 2

Email: childrensocialcare@hounslow.gov.uk

Out of hours: After 5pm weekdays or weekends

Telephone 020 8583 2222 and ask to speak to the duty social worker

**Ealing Children's Services:
(Diploma)**

Telephone: 02028 825 8000

You can also use the link below to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should: (Refer to diagram above)

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

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

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

Not recognise their experiences as harmful

Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

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

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

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

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

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

Children Services in Hounslow:

Telephone: 020 8583 6600 option 2

Email: childrensocialcare@hounslow.gov.uk

Out of hours: After 5pm weekdays or weekends

Telephone 020 8583 2222 and ask to speak to the duty social worker

Ealing Children's Services:

(Diploma)

Telephone: 02028 825 8000

You can also use the link below to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

You can also call 101 or 999

Say you're making a report under the FGM mandatory reporting duty

Have information about the DSL's contact details and the girl's age and address to hand, as well as your own contact information and available hours

Take note of the reference number you're given

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

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

Early help assessment

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

Children's Social Care, Education and Early Intervention Privacy Notice.



Social Services Assessment Framework

Referral

If it is appropriate to refer the case to local authority for 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.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their

concerns have been addressed and that the child's situation improves.

Children's Social Care, Education and Early Intervention Privacy Notice.

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authorities on children's social care. Make a referral to local authority for children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as possible after the referral.

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

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

- In an emergency, call 999 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

Hounslow's Prevent and Counter Extremism Team

- Community Inclusion & Participation Manager, Prevent & Counter Extremism
Lead: Joan Conlon - joan.conlon@hounslow.gov.uk
07817 079190
- Prevent Education Officer:
Karmjit Rekhi - karmjit.rekhi@hounslow.gov.uk 07976 721119
- Prevent Coordinator:
Najeeb Ahmed najeeb.ahmed@hounslow.gov.uk 07890-540433

7.6 If you have a concern about mental health

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

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

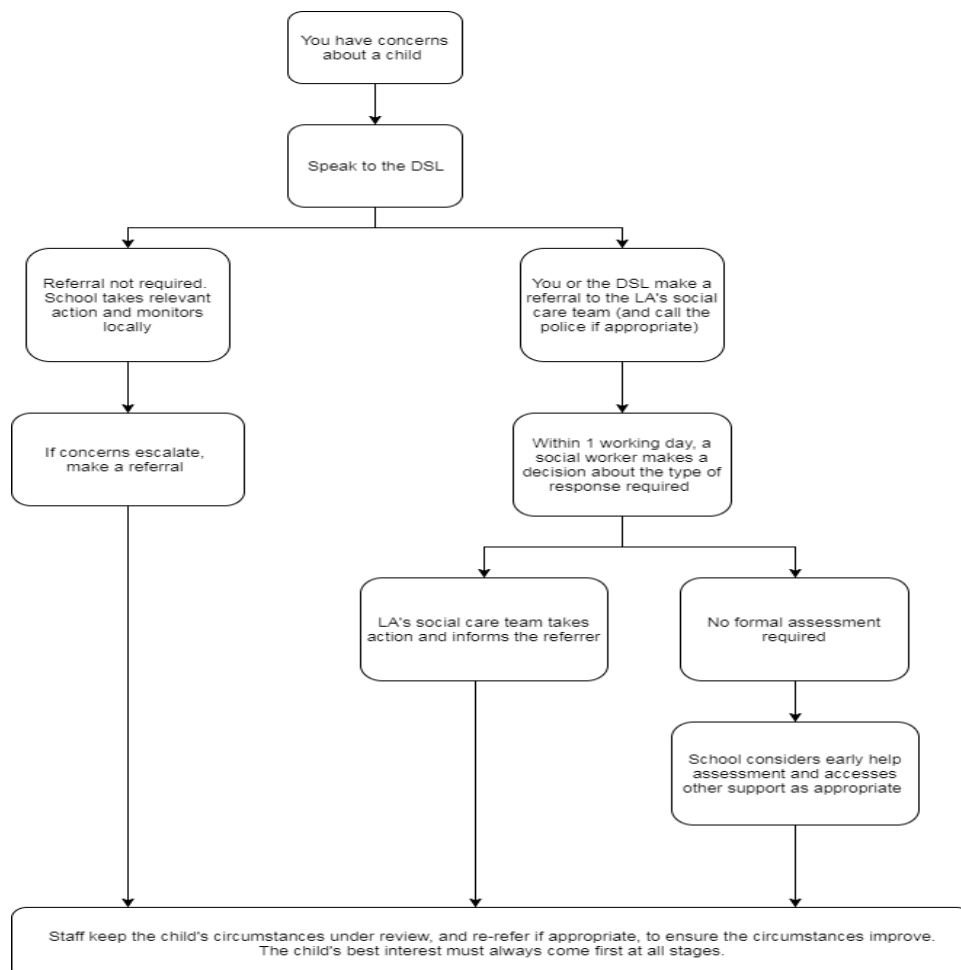
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Refer to the Department for Education for guidance on mental health and behaviour in schools for more information.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do).



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

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

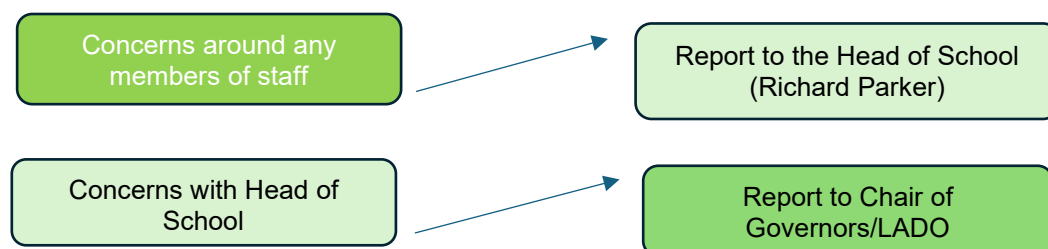
The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

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

The headteacher/proprietor will then follow the procedures set out in appendix 3, if appropriate.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. The headteacher will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the headteacher, speak to the Chair of Governors (Amin Makarem) or the local authority designated officer (LADO).



Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

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

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

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

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

Most cases of pupils hurting other pupils 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:

- Is serious, and potentially a criminal offence

- Could put pupils in the school at risk

- Is violent

- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix 4 for more information about child-on-child abuse.

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

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

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

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

In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the Education Safeguarding Team or via consultation from a Local Authority social worker at the Front Door. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.

On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation process.

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent. Ensure pupils are able to easily and confidently report abuse using our reporting
- systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to:
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
 - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes (‘sexting’) Your responsibilities when responding to an incident

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

You must **not**:

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

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment. If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

Policing in Hounslow is carried out by the Metropolitan Police.

If it is necessary to refer an incident to the police, this will be done through:

Dial 999 in any emergency, or you can call or visit one of the local police stations in person.

To contact your local police station by telephone dial the police non-emergency number: 101

Acton Police
Station 250 High
Street London,
W3 9BH

Opening hours: 24 hours a day

Hammersmith Police
Station 226 Shepherds
Bush Road Hammersmith,
London, W6 7NX
Opening
hours: 24 hours a day

Hounslow Police
Station 5 Montague
Road Hounslow,
TW3 1LB

Opening hours: 24 hours a day

Shepherd's Bush Police
Station 252 Uxbridge Road
W12 7JA

Opening hours: 24 hours a day

**Twickenham Police
Station 41 London Road
TW1 3SY**

Opening hours: 24 hours a day

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSHE programme and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality

The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images
The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

Put systems in place for pupils to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Students are aware that they can share concerns to any member of staff and this information is shared regularly in RSHE lessons and tutor programme. Reports of child-on-child abuse will always be handled with due care, concern and rigor, and recorded using our standard operational Safeguarding procedures (We use the software CPOMS).

Substantiated reports will be promptly shared with/escalated to the relevant agencies and stakeholders as necessary.

We also recognize that there may be reports of child-on-child abuse which prove to be unsubstantiated, unfounded, false or malicious. In any such case, the DSL in conjunction with the relevant senior staff will consider whether the person making the allegation did so as a cry for help, or whether disciplinary action (in line with the behavioural policy) is indicated. In line with our zero tolerance of child-on-child abuse, we will decide both how:

the student against whom the unfounded allegation was made, can best be supported,

and how the student who made a false allegation can (alongside any disciplinary action) best be supported.

Our pupils feel safe in submitting any concerns as the school follows through with the safeguarding protocols and they are reassured during the process.

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

We will review our filtering and monitoring provision ****at least annually**** against the DfE filtering and monitoring standards and ensure leadership and relevant staff understand roles and escalation. These expectations also apply to the safe use of ****generative AI**** in education, in line with DfE product safety expectations.

Our approach to online safety now includes the following enhancements in line with Keeping Children Safe in Education (KCSIE) 2025:

Four Cs of Online Risk:

We expand the traditional Four Cs (Content, Contact, Conduct, Commerce) to explicitly include misinformation, disinformation, and conspiracy theories as part of harmful content risks.

Technology Planning Guidance:

We reference the DfE's September 2024 guidance on planning technology for schools, which provides self-assessment tools to ensure safe, cost-effective digital infrastructure and compliance with digital and technology standards.

Generative AI Safety Expectations:

In line with DfE's January 2025 guidance, we ensure that any use of generative AI in education meets product safety expectations and does not expose pupils to harmful content or risks.

Cyber Security Standards:

We commit to meeting the DfE cyber security standards to protect school systems and data, and to prevent cyber incidents that could compromise pupil safety.

Mental Health and Well Being

Schools have an important role to play in supporting the mental health and wellbeing of their students.

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

Only trained professionals will make a diagnosis of a mental health problem, but some of our highly trained members of senior staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education.

Staff should take action on any mental health concerns that are also safeguarding concerns, following your school's child protection policy and speaking to the DSL or deputy. We are mindful that students will suffer from degrees of stress, anxiety and mental health conditions related to a range of issues that are affecting them. These could include forms of neglect and abuse as well as:

- Bereavement
- Refugee/asylum status
- Chronic disabling illness and
- other serious family issues.

If left unsupported, students may develop behaviours linked to trauma which will lead to poor academic performance and underachievement.

Where behaviours are identified we will support students by offering them access to our school counsellor, for severe high-risk cases we will advise the family to seek further professional support.

Referrals will also be made to NHS CAMHS (Child and Adolescent, Mental Health Service) which can also be made via the family's GP.

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or

financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Advise staff/ parents and students to keep their online social media details private and confidential to ensure privacy and safety.

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- Artificial Intelligence (AI) - generative AI tools are now widely available and easy

to access. Staff, students and parents/carers may be familiar with chatbots such as ChatGPT and Google Bard.

ISL recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose young people to harmful content. For example, the use of 'deep fakes', where AI is used to create images, audio or video hoaxes that look real.

ISL, in line with the IT and internet usage policy, will treat any use of AI to access harmful content or bully others in line with this and our behaviour policy.

Staff should refer to our IT & internet usage policy for further guidance.

For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

[\[www.isllondon.org/policies\]](http://www.isllondon.org/policies).

9. Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent. If allegations are made against parents directly, we as a school are not duty bound to inform parents, this disclosure will come directly from Children's social services, and they will engage further with parents.

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

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

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

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-

based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges We offer extra pastoral support for these pupils. This includes:
- Liaison with the Head of Pastoral and the Head of Years, counselling, social skills intervention, zones of regulation intervention, Speech and Language intervention, etc.
- Any abuse involving pupils with SEND will require close liaison with the DSL and the SENCO.

11. Children who are lesbian, gay, bisexual, or gender questioning (LGB/GQ)

Being LGB is not an inherent risk factor for harm; however some children may be targeted by others. For gender questioning children, a cautious approach is required, considering the broad range of individual needs, involving parents/carers (unless this would place the child at risk of significant harm), taking account of any clinical advice, and addressing wider vulnerabilities such as bullying.

12. Pupils with a social worker

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

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

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

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

13. Looked-after and previously looked-after children

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

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

14. Complaints and concerns about school safeguarding policies

14.1 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).

14.2 Other complaints

Stage 1 (Informal Stage)

- Complainant has an informal discussion with the person closely involved with the complainant's cause for concern or with the Principals direct.
- If after the discussion the matter is not resolved or if the complainant is not happy with the way that it has been handled then the process moves to the next stage.
- However, every effort should be made to resolve the matter at this stage.

Stage 2 (Formal Stage)

- Once a formal written complaint is received from the complainant then the Principals will undertake an investigation and reply in writing to the complainant within 15 days.
- However, if the complainant is not satisfied with the outcome then the complainant should move to the next stage.
- If a formal written complaint is received about the Principals from the complainant then the complaint must be sent to the Personal Assistant to the Head of School with a written reply being sent to the complainant within 15 days.
- If the complainant is not satisfied with the outcome, then the complainant should move to the next stage.

Stage 3 (Formal Stage)

- The complainant writes formally to the Personal Assistant to the Head of School outlining the reasons why he/she is not happy with the outcomes of the Principals' investigation.
- The complainant requests that an appeals panel reviews the complaint.
- An appeals panel meets within 12 to 20 days after receipt of the complainant's letter.
- The complainant may request an investigation by the LA if he/she feels that that the review has not been handled fairly or if it has not been conducted in accordance with the school's complaints procedures.

Complaints regarding the Curriculum and General Educational Provision

All curriculum and general educational provision complaints will be dealt with by the Local Authority in line with their set complaints procedures

14.3. Whistleblowing

ISL recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff, including temporary staff/substitute staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of Safeguarding and Child Protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

If it becomes necessary to consult outside of ISL, they should speak in the first instance, to the LADO.

- Local Authority Designated Officer for Hounslow:
Grace Murphy
Tel: 0208 583 4933
Email: grace.murphy@hounslow.gov.uk

Sarah Paltenghi Tel: 0208 583 3423
Email: sarah.paltenghi@hounslow.gov.uk
Working days: Monday – Wednesday (9:00am-5:00pm)

The LADO for Ealing is Emmanuel Adolfo
Tel: 020 8825 8930
Email: asv@ealing.gov.uk

15. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern
Details of how the concern was followed up and resolved

A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

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

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

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

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

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand 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 integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the 3 safeguarding partners

Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

Have regard to the Teachers' Standards to support the expectation that all teachers:

Manage behaviour effectively to ensure a good and safe environment

Have a clear understanding of the needs of all pupils

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

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

Setting Professional Boundaries

All adults working with children are in positions of trust and so a high standard of behaviour is expected. A relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential and consider the following personal boundaries:

All adults working with children have a responsibility to maintain public confidence in their ability to safeguard. It is expected that an adult who works with children adopts a high standard of personal conduct and avoids behaviour that could be seen to compromise their work with children such as the misuse of drugs and alcohol or acts of violence and other criminal acts.

Where a person aged 18 or over is in a specified position of trust with a child under the

age of 18 (or a college student over the age of 18) it is illegal for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

No child / student should live in or be invited to the home of an adult who works with them unless the reason for this has been firmly established and agreed with the child's parents/carers and the professional's senior managers / Head teacher.

Occasionally, a student may develop an infatuation with an adult who works with them. If an adult becomes aware of such a situation, they should discuss it with the DSL at the earliest opportunity to avoid any hurt, distress or embarrassment on behalf of the child. The DSL will share this information with the Headteacher who together will ensure that all parties are clear of expectations and next steps. A record will be kept of such situations to safeguard staff and students.

Communication between staff and students, by whatever means, should take place within clear professional boundaries, this includes the use of technology including mobile phones, text messaging, emails and social media. To be clear, staff should not exchange personal numbers, email addresses or social media usernames so that they can communicate personally. All communication should take place via the established school systems.

Adults/staff should not share personal information with a student, nor should they request or respond to any personal information from the child. Adults should ensure that all of their communications with a child are transparent and open to scrutiny. They should not give out personal contact details.

Many jobs within the children's workforce require physical contact with children. There are occasions when it is entirely appropriate for adults to have some physical contact with the child. However, it is crucial that, in all circumstances, adults should only touch children in ways which are appropriate to their profession or agreed role and responsibilities. When physical contact is made with a child, this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.

One-to-one situations have the potential to make a child more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with children may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when these are unavoidable, reasonable and sensible precautions are taken.

16.2 The DSL and deputies

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

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

They will also undertake Prevent awareness training.

16.3 Governors

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured that safeguarding policies and procedures are effective and support the

school to deliver a robust whole-school approach to safeguarding

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

16.4 Recruitment – interview panels

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

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

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

15.6 Staff Wellbeing

ISL recognises the emotional support that staff may require from time to time. Staff have access to Mindfulness training and a Mindfulness room. They also have access to additional support and guidance through our HR services.

17. Monitoring arrangements

This policy will be reviewed **annually** by the Designated Safeguarding Lead and at every review, it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices

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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

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

Safer recruitment policy

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

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

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

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

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

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

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition

below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

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

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

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

Regulated activity means a person who will be:

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

Existing staff

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

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

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

or

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

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

We believe the individual has engaged in relevant conduct; or

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

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

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

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

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

Trainee/student teachers

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

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has

been judged by the provider to be suitable to work with children.

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Board of Trustees

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

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

The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

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

Staff working in alternative provision settings

Where we place a pupil with an alternative provider, we remain responsible for safeguarding and will obtain written assurance on appropriate checks, keep accurate records of all locations attended, and review placements at least half-termly, ending placements if safeguarding concerns arise.

Written confirmation of safer recruitment checks for AP is staff required.

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff **Allegations against staff (including low-level concerns)** **policy**

Section 1: allegations that may meet the harms threshold

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

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

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

Procedure for dealing with allegations

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

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

such information with the individual as has been agreed with those agencies

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

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

possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether

any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

If an allegation is:

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

Confidentiality and information sharing

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

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

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

- to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.
- Safeguarding concern or allegation from another member of staff

Definition of low-level concerns

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

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

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

Being overly friendly with children

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

Sharing low-level concerns

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

- Ensuring staff are clear about what appropriate behaviour is, and are

confident indistinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

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

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

Retained at least until the individual leaves employment at the school

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

References

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

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

Appendix 4: specific safeguarding issues

Children who are absent from education:

We will work with children's services where absence indicates safeguarding concerns, in line with Working Together to improve school attendance (2024).

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk.

These include children who:

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Persistent or prolonged absence will trigger safeguarding responses in line with *Working Together to improve school attendance*. Where parents express an intention to educate at home, we will work with the local authority to coordinate a meeting with parents/carers before a final decision is made, taking particular care where the child has SEND, a social worker or other vulnerabilities (reflecting the School Attendance (Pupil Registration) (England) Regulations 2024).

Types of Abuse and Neglect Self-Harm

Self-harm can take lots of physical forms, including cutting, burning, bruising, scratching, hair-pulling, poisoning and overdosing.

There are many reasons why children and young people try to hurt themselves. And once they start, it can become a compulsion. That's why it's so important to spot it as soon as possible and do everything you can to help.

Rather than being a cry for attention or an attempt at suicide, self-harm is usually a way for young people to release overwhelming emotions. It may also be copying behaviour that they have seen in the media or online.

Self-harm is a real cause for concern because it's becoming more and more common.

The exact reasons why children and young people decide to hurt themselves aren't always easy to work out. In fact, they might not even know exactly why they do it.

There are links between depression and self-harm, and quite often a child or young person who is self-harming is being bullied, under too much pressure to do well at school, being emotionally abused, grieving or having relationship problems with families or friends. Some young people use social media and websites to connect with and share feelings related to self-harm.

How to spot the warning signs

Young people will go to great lengths to cover self-harm scars and injuries. If you do spot them they might be explained away as accidents.

The signs to look for divide into the physical and emotional.

Physical

These are commonly on the head, wrists, arms, thighs and chest and include:

- Cuts
- Bruises
- Burns
- Bald patches from pulling out hair.
- Young people who self-harm are also very likely to keep themselves covered up in long-sleeved clothes even when it's really hot.
- Emotional

The emotional signs are harder to spot and don't necessarily mean that a young person is self-harming. But if you see any of these as well as any of the physical signs then there may be cause for concern:

- Depression, tearfulness and low motivation
- Unusual eating habits; sudden weight loss or gain
- Low self-esteem and self-blame
- On-line Abuse

Online abuse is any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Child on Child Alleged Abuse

ISL recognises that students may well be victims of abuse from other students. Child on Child abuse can manifest itself in many ways and we will have regard for the different types

of gender issues that can be prevalent. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. We recognise that abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up', as this can lead to a culture of unacceptable behaviours and create an unsafe environment.

Where allegations are made by one child against another child, they will be acted on.

- The allegation should be brought to the attention of the designated safeguarding lead immediately
- The designated safeguarding lead will decide whether the matter should be dealt with under the school's safeguarding policy or behaviour for learning policy
- The designated safeguarding lead will inform parents of each of the students involved within one day of the allegation being made

Domestic Abuse and Child on Child Relationship Abuse

Domestic abuse is the term applied to the varied forms of abuse experienced from a current or former intimate partner. It is a pattern of control, coercion and threats and can involve physical abuse (such as assault), emotional abuse (such as intimidation), sexual abuse (such as rape), psychological abuse (such as isolating them from friends and family), and financial abuse (such as using money to control them). Domestic abuse can also be inflicted alongside wider family abuse involving multiple perpetrators, including in gang-associated relationships and where family or community 'honour' is perceived to be at stake. As well as being affected by domestic abuse within parent/carer relationships at home, young people can also experience abuse within their peer relationships.

Domestic abuse can be emotional, physical, sexual, financial or psychological, such as:

- Kicking, hitting, punching or cutting
- Rape (including in a relationship)
- Controlling someone's finances by withholding money or stopping someone earning
- Controlling behaviour, like telling someone where they can go and what they can wear
- Not letting someone leave the house
- Reading emails, text messages or letters.

Being exposed to domestic abuse has serious consequences for children and young people; and it can affect how they feel, think and behave in harmful ways.

- Children who witness domestic abuse are also victims
- Witnessing domestic abuse can have a lasting impact on children
- Children can be victims, and perpetrators, in their own relationships too
- The abuse can be physical, sexual, financial, psychological or emotional
- Threatening to kill someone or harm them
- Threatening to another family member or pet.

Signs of Domestic Abuse

It can be difficult to tell if domestic abuse is happening and those carrying out the abuse can act very differently when other people are around. Children and young people might also feel frightened and confused, keeping the abuse to themselves.

Signs that a child has witnessed domestic abuse can include:

- Aggression or bullying
- Anti-social behaviour, like vandalism

- Anxiety, depression or suicidal thoughts
- Attention seeking
- Bed-wetting, nightmares or insomnia
- Constant or regular sickness, like colds, headaches and mouth ulcers
- Drug or alcohol use
- Eating disorders
- Problems in school or trouble learning

Online Abuse

Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:

- Social media
- Text messages and messaging apps
- Emails
- Online chats
- Online gaming
- Live-streaming sites.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

As a lot of young people's social interaction now occurs through social media, they are exposed to online harassment and abuse from peers or adults. This facilitates and amplifies the violence and abuse they experience offline. Adults or peers can also manipulate online relationships to initiate non-contact sexual abuse (e.g. via webcam) or to exploit them into sexually abusive or exploitative relationships offline through making them send self-generated photographs (which can then be used to threaten, coerce and control them), or introducing them to sexualised or pornographic material.

Signs of Online Abuse

A child or young person experiencing abuse online might:

- Spend a lot more or a lot less time than usual online, texting, gaming or using social media
- Seem distant, upset or angry after using the internet or texting
- Be secretive about who they're talking to and what they're doing online or on their mobile phone
- Have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

Some of the signs of online abuse are similar to other abuse types:

- Cyberbullying
- Grooming
- Sexual abuse
- Child sexual exploitation.

For more information go to;

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/online-abuse/>.

So-called 'Honour Based' Abuse

So-called 'honour-based' abuse encompasses 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. All forms of honour based abuse is abuse and will be escalated.

Staff will make the appropriate referrals to the DSL if there is a suspicion.

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

- These are defined as forms of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity
- The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources
- In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (e.g. increased status) of the perpetrator or facilitator
- It can be perpetrated by individuals or groups, males or females, and children or adults
- It can be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse
- It can involve force and/or enticement-based methods of compliance and can involve violence or threats of violence
- Victims can be exploited even when activity appears to be consensual
- It can happen online as well as in person.

What is Criminal Exploitation?

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>

Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.

Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including Cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators

of sexual exploitation:
Children who...

- Appear with unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Have older boyfriends or girlfriends
- Suffer from sexually transmitted infections or become pregnant
- Suffer from changes in emotional well-being
- Misuse drugs and alcohol
- Go missing for periods of time or regularly come home late
- Regularly miss school or education or do not take part in education.

Gang Activity - What is a gang?

The word 'gang' means different things in different contexts, the government in their paper 'Safeguarding children and young people who may be affected by gang activity' distinguishes between peer groups, street gangs and organised criminal gangs.

Peer group

A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.

Street gang

"Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity."

Organised criminal gangs

"A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crimes is their occupation."

It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.

Children and teenagers who become involved in gangs are at risk of involvement in violent crime and exploitation by adults and other young people. Children mixed up in gang culture may show violent and retaliatory behaviour and may be more prone to committing acts of sexual abuse or using prohibited drugs. If we become aware of a student's involvement in criminal activity, we will make contact with Ealing's Youth Offending Service and also inform our Safer Schools Police officer.

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.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes. 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. Children can easily become trapped by this type of exploitation 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 a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Children Absent from or Missing Education

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

A child who is regularly absent, or goes missing from education is a potential indicator of abuse or/and neglect, especially with regard to sexual exploitation and FGM or Child Criminal Exploitation, mental health problems, substance abuse, radicalisation or forced marriage.

Some children are particularly at risk of being absent and then missing from education. These include children who:

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

Staff will inform the DSL if they suspect that a child's absence from school is of concern. If a student is suspected as being 'missing in education' reasonable enquiries will be made by attendance Staff/Learning Mentors and our Safer Schools Police Officer to establish why the student is not in school. This will include home visits and notifying the Local Authority, Social Care and the Police.

Staff are asked to follow the school's procedures for unauthorised absence when dealing with children that go missing from education, particularly on repeat occasions, to help identify the reasons and to help prevent the risks of their going missing in future.

We will be aware of and consider the risks of potential safeguarding concerns such as travelling to conflict zones around the world (as determined by the Foreign and Commonwealth Office), FGM and forced marriage.

Children Missing from Home or Care

At times vulnerable children will go missing and/or run away from home. Such cases will be of high priority and will include the school working closely with the police, children's social services and the child's family. We will:

- Search the school grounds, classrooms etc. and provide the police with information of known places that the child might visit
- Engage with the child's school friends so that any contact can be shared with the authorities especially related to social media accounts
- Record and share all relevant information pertaining to the child such as a photo,

- the child's home address and contact details for all parents and carers
- Take advice from the statutory authorities on next steps to take
- Provide the statutory authorities with information relevant to the child and their peers
- Where there is sensitive information to share with a child we will endeavour to do this with their parents/guardians.

We will not:

- Pass on confidential information to non-statutory agencies or third parties such as the press
- Provide the friends of the missing child with any information that they don't need to know
- Lead the investigation as this will be done by the Police alongside social services.

Bullying and Cyberbullying

Bullying is behaviour that hurts someone else such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere: at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks and mobile phones, is often called Cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Bullying includes:

- verbal abuse, such as name calling and gossiping
- non-verbal abuse, such as hand signs or text messages
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls
- online or cyberbullying.

Online or Cyberbullying

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos.

Cyberbullying can happen at any time or anywhere. A child can be bullied when they are alone in their bedroom, so it can feel like there's no escape.

Cyberbullying includes:

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- 'Trolling' - the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm
- Voting for or against someone in an abusive poll

- Creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- Sending explicit messages, also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations.

Sharing nudes and semi-nudes: how to respond to an incident

What do we mean by sharing nudes and semi-nudes? In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds.

This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention: Report it to our Designated Safeguarding Lead (DSL) or equivalent immediately.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support
- Do not delete the imagery or ask the young person to delete it
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent)
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- Do not say or do anything to blame or shame any young people involved
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Once reported, the DSL will hold an initial review meeting with appropriate school staff (this may include the member of staff who reported the incident and the safeguarding/ Pastoral Team). This meeting will consider the risk and plan the management of this disclosure. The DSL will also inform parents/carers at an early stage and keep them involved in the process, unless there is good reason to believe that involving them would/could put the student at risk.

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

Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence; domestic abuse includes any emotional, physical, sexual, financial or psychological abuse.

It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people.

Domestic abuse can include:

- Sexual abuse and rape
- Punching, kicking, cutting, hitting with an object
- Withholding money or preventing someone from earning money
- Not letting someone leave the house
- Reading emails, text messages or letters
- Threatening to kill or harm them, another family member or pet.

Child Abuse linked to faith or belief

Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by, a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child.

Any abuse that takes place against those who are branded (or labelled) either as a witch or as having been possessed by an evil spirit is unacceptable. Significant harm (including murder) can occur because of concerted efforts to 'excise' or 'deliver' evil from a child (or vulnerable adult).

This kind of abuse is under-reported.

Spotting the signs that this abuse exists can prevent escalation from 'subtle' harms that may often go unnoticed by many, to 'extreme' situations where there is loss of life. Witchcraft beliefs are used to blame a person (rather than circumstances) for misfortune that happens in life.

It can take place for some of the following reasons:

Abuse as a result of a child being accused of being a 'witch'

- Abuse as a result of a child being accused of being possessed by 'evil spirits'
- Ritualistic abuse which is prolonged sexual, physical and psychological abuse
- Satanic abuse which is carried out in the name of 'satan' and may have links to cults
- Any other harmful practice linked to a belief or faith.

The forms of abuse that can occur fall into the four main categories below:
or faith organisation. These people exploit the belief as a form of control or threat.

Belief in Evil Spirits

Belief in evil spirits that can 'possess' children is often accompanied by a belief that a possessed child can 'infect' others with the condition. This could be through contact with shared food, or simply being in the presence of the child.

Scapegoating

A child could be singled out as the cause of misfortune within the home, such as financial difficulties, divorce, infidelity, illness or death.

Children are trafficked for:

- Child sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs, bag theft
- Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.

Official definition: The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings'.

Child Abuse & Animal Abuse

There is an increasing amount of research to suggest links between the abuse of animals and the abuse of children. All professionals working with children should be alert to the possibility of animal cruelty in the backgrounds of parents suspected of abusing children. Likewise, a child who harms or advocates cruelty to animals may be acting out in relation to abuse they are witnessing or suffering.

Cybercrime

- This is defined as criminal activity committed using computers and/or the internet
- This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), and creating and using malware such as viruses
- Children who are particularly skilled in computing and technology may be drawn into cybercrime – either deliberately or inadvertently.

Child Abduction and Community Safety Incidents

- Child abduction is when children are taken from their parents or carers without permission. It can be committed by parents or other family members, by people known but not related to the child (like neighbours, friends and acquaintances), and by strangers
- Community safety incidents are things like unknown adults loitering near school or trying to talk to children
- Always follow our pick-up procedures to make sure children only go home with their designated adult(s)
- If staff see anything suspicious or that doesn't feel right, they are required to report it immediately to the police by dialling 999 and inform our DSL or a senior member of staff.

Modern Slavery

- This includes human trafficking and slavery, servitude and forced or compulsory labour
- The exploitation can take many forms, for example sexual exploitation, forced labour, forced criminality and the removal of organs
- There's a national referral mechanism for modern slavery – speak to our DSL if you
- How often the school will make contact
- Which staff member(s) will make contact
- How they will make contact.

We will agree these plans with children's social care where relevant, and will review them on a weekly basis.

If we can't make contact and we are concerned, we will be contacting children's social care or the police.

Complex Family Structure

Research suggests that a child living with extended family, non biological parents, or foster parents is more at risk. In these situations they are more likely to have been subject to trafficking and made to work in servitude.

What to look out for:

Indicators of child abuse linked to faith or belief include the following:

- Physical injuries, such as bruises or burns (including historical injuries/scaring)

- A child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'
- The child or family may use words such as 'kindoki', 'djin', 'juju' or 'voodoo' - all of which refer to spiritual beliefs
- A child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children
- A child's personal care deteriorating (eg rapid loss of weight, being hungry, turning up to school without food or lunch money, being unkempt with dirty clothes)
- It may be evident that the child's parent or carer does not have a close bond with the child
- A child's attendance at school or college becomes irregular or there is a deterioration in a child's performance
- A child is taken out of a school altogether without another school place having been arranged
- Wearing unusual jewellery/items or in possession of strange ornaments/scripts.

Taken from:

<https://www.met.police.uk/advice/advice-and-information/caa/child-abuse/faith-based-abuse/>,

Fabricated or induced illness (FII)

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

FII used to be known as 'Munchausen's syndrome by proxy' (not to be confused with [Munchausen's syndrome](#), where a person pretends to be ill or causes illness or injury to themselves).

It can be very difficult to confirm a suspected case of fabricated or induced illness (FII). School staff and healthcare professionals will naturally assume that a parent or carer will always act in the best interests of a child in their care, unless there's compelling evidence to suggest otherwise.

The patterns of abuse found in cases of FII usually fall into one of six categories. These are ranked as follows, from least severe to most severe:

- Exaggerating or fabricating symptoms and manipulating test results to suggest the presence of an illness
- Intentionally withholding nutrients from the child or interfering with nutritional intake
- Inducing symptoms by means other than poisoning or smothering, such as using chemicals to irritate their skin
- Poisoning the child with a substance of low toxicity – for example, using [laxatives](#) to induce [diarrhoea](#)
- Poisoning the child with a poison of high toxicity – for example, using insulin to lower a child's blood sugar level
- Deliberately smothering the child to induce unconsciousness.
- NHS indicates that previous case reports of FII have uncovered evidence of:
- Parents or carers lying about their child's symptoms
- Parents or carers deliberately contaminating or manipulating clinical tests to fake evidence of illness – for example, by adding blood or glucose to urine samples, placing their blood on the child's clothing to suggest unusual bleeding, or heating thermometers to suggest the presence of a fever
- Poisoning their child with unsuitable and non-prescribed medicine
- Infecting their child's wounds or injecting the child with dirt or faeces (stools)

- Inducing unconsciousness by suffocating their child
- Not treating or mistreating genuine conditions so they get worse
- Withholding food, resulting in the child failing to develop physically and mentally at the expected rate.

If we suspect FII we will make a referral to social services in line with our normal referring procedures.

Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed, or that what has happened is abuse. Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining a child's trust. They may also try to gain the trust of the whole family so they can be alone with the child.

Groomers do this by:

- Pretending to be someone they are not, for example saying they are the same age as the child online
- Offering advice or understanding
- Buying gifts
- Giving the child attention
- Using their professional position or reputation
- Taking them on trips, outings or holidays.

Using secrets and intimidation to control children

Once they have established trust, groomers will exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what they want.

Groomers may introduce 'secrets' as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

Online Grooming

Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child. They can spend time learning about a young person's interests from their online profiles and then use this knowledge to help them build up a relationship. It's easy for groomers to hide their identity online - they may pretend to be a child and then chat and become 'friends' with children they are targeting.

Groomers may look for:

- Usernames or comments that are flirtatious or have a sexual meaning
- Public comments that suggest a child has low self-esteem or is vulnerable.

Groomers don't always target a particular child. Sometimes they will send messages to hundreds of young people and wait to see who responds. Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

Prevent Duty

From 1 July 2015 all schools have a duty to fulfil Prevent. Protecting children from the risk of radicalisation is seen as part of Featherstone High School's wider Safeguarding duties. Prevent duty is not intended to stop students debating controversial issues but to build resilience to radicalisation as we will teach values that will challenge extremist views. Via our PSHE programme students will have the opportunity to learn about the dangers of extremism and be able to identify signs of radicalisation. We will provide a safe space where students and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

We will:

- Ensure that governors, staff, parents and students are aware of the increased risk of online radicalisation and assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology
- Ensure that via parental engagement meetings, parents/carers will receive advice, guidance and support on how they can keep their children safe and away from extremism and radicalisation
- Be alert to changes in student's behaviour which could indicate that they may be in need of help or protection
- When it is appropriate, make a referral to the Channel programme. 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. The programme uses a multi-agency approach to protect vulnerable people
- Provide staff with WRAP (Workshop to Raise Awareness of Prevent) training
- Ensure that suitable filtering is in place on our IT system to prevent and ensure that students are safe from terrorist and extremist material when accessing the internet in school and whilst using our devices
- Ensure that students understand how to stay safe online and provide parents with guidance and advice on how to best to support their children
- Promote British values throughout the curriculum whilst sensitively discussing views and opinions that are contrary to them.

Extremism, Radicalisation & Social Media

As aforementioned, schools have a vital role to play in protecting students from the risks of extremism and radicalisation. ISL will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

Protecting children from the risk of radicalisation is part of ISL's wider Safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. 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 of time.

Keeping children safe from risks posed by extremists and terrorist exploitation of social media will be approached in the same way as safeguarding children from any other online abuse. Terrorist organisations are trying to radicalise and recruit young people through an extensive use of social media and the internet as well as via social community gaps. As with other online harms, every member of staff needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

In the same way that staff are vigilant about signs of possible physical or emotional abuse in any of our students, if we have a concern for the safety of a specific young person at risk of radicalisation, we will follow our school's safeguarding procedures, and where deemed necessary, we will discuss the case with Ealing/Hounslow Children services.

At ISL London, Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.