

Safeguarding & Child Protection Policy 2025 - 2026

This policy is available to parents and prospective parents on the school's website and by request from the School Office. If you require a copy of this document in large print or audio format, please contact the School Office.

Policy Review Schedule

Policy	TPA Safeguarding and Child Protection Policy (including TPA Allegations against Staff Process at Appendix 2)
Review schedule	Annually
Statutory Policy	Yes
Policy owner	TPA Principal
Lead Reviewer	TPA DSL
Approver and date of last approval	OLT Board: 23/09/2025
Key review dates	Changes made
September 2023	Policy completely review in line with AfC / Kingston and Richmond Safeguarding Children Partnership Model Policy; this documents the changes reflected in Keeping Children Safe in Education 2023.
January 2024	Policy updated to reflect the EYFS Statutory Framework update.
September 2024	Policy reviewed in line with KRSCP and Reviewed and updated to align with KCSiED 2024 requirements and local authority (AfC/ Kingston and Richmond Safeguarding Children Partnership) model policy template for September 2024, with review and update to Annex containing TPA's Allegations Against Staff Policy
September 2025	Policy reviewed in line with KRSCP and updates to KCSiE 2025.

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1. Introduction and policy aims

Twickenham Primary Academy has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do at Twickenham Primary Academy. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

We aim to make sure that:

- The school has a clear process in place, that is shared with and followed by all members of the school community, when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse, neglect and exploitation, such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, other children, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

2. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop

Child protection means the processes carried out to protect children who have been identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, trustees, supply staff and self-employed staff.

Child means anyone under the age of 18.

Parent means birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Statutory means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Wherever local safeguarding arrangements are referred to in this policy, they mean the arrangements agreed and published by KRSCP or the [London Child Protection Procedures and Practice Guidance](#).

Twickenham Primary Academy will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.

3. Key personnel

Designated safeguarding lead (DSL) and
dedicated teacher for Young Carers



Erin Moscardini

e.moscardini@twickenhamprimaryacademy.org

Deputy designated safeguarding leads

Kizzie Elliott

k.elliott@twickenhamprimaryacademy.org

Rebecca Johnson

r.johnson@twickenhamprimaryacademy.org

Rebecca Gillis

r.gillis@twickenhamprimaryacademy.org

CEO and Designated Trustee for
Safeguarding



Jodie Croft

j.croft@omnialearningtrust.org

SENDCo (Special Educational Needs and
Disabilities coordinator) and Designated
teacher for children looked after



Rebecca Johnson

r.johnson@twickenhamprimaryacademy.org

	<p>Dedicated ward officer</p> <p>Our dedicated Ward team can be found here:</p> <p>https://www.police.uk/pu/your-area/metropolitan-police-service/twickenham-riverside/?yourlocalpolicingteam=ab-out-us</p>
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Children's services

Achieving for Children (AfC) single point of access (SPA)

Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the [Single Point of Access \(SPA\)](#) website.

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 020 8547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to on 020 8770 5000.

If a child needs support in the boroughs of Hounslow (if your home address is in Hounslow), then this link https://www.hounslow.gov.uk/info/20075/child_protection provides access to referrals for all agencies.

This government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](#)

Go to [section 6](#) of this policy for in-school procedures.

Local authority designated officer (LADO)

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the CEO of the trust to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: [LADO referral form](#)

4. The law (legislation) and statutory guidance

In addition to KRSCP's [arrangements](#) and the [London Child Protection Procedures and Practice Guidance](#), Twickenham Primary Academy follows the laws and statutory guidance below:

[Keeping children safe in education 2025](#), from now on referred to as KCSIE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

[Statutory framework for the early years foundation stage 2025](#) sets the standards that all early years providers, such as nurseries, must meet to make sure that children learn and develop well and are kept healthy and safe.

[Working Together to Safeguard Children 2023](#) guidance produced by the government states how practitioners, such as teachers, social workers, the police and health professionals working with children and families should work together to make sure that children and young people remain safe from harm.

[Education Act 2002](#), Section 175/[The Education \(Independent School Standards\) Regulations 2014/Part 1 of the schedule to the Non-Maintained Special Schools \(England\) Regulations 2015](#) places a duty on maintained/independent schools (including academies) and local authorities to keep children safe and promote their welfare.

The [Children Act 1989](#) is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The [2004](#) amendment is used alongside the Act.

The [Children Act 1989 Care Planning, Placement and Case Review](#) sets out what responsibilities education settings have for children looked after by the local authority.

[The Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

[The Equality Act 2010](#) states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The [Equality Act 2010: advice for schools](#) advises us further.

[The Public Sector Equality Duty \(PSED\)](#) states that we have to be mindful of the need to eliminate

unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.

More legislation is covered throughout this policy in their relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

5. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities.

The Board of Trustees

The non-statutory [Academy trust governance guide](#) sets out the roles, responsibilities and legal duties for boards of trustees.

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding children partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- The school submits the safeguarding self-audit to the local safeguarding children partnership annually.
- Safeguarding is a standing item on the agenda for trustee meetings.
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.
- An experienced trustee takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link trustee).
- There is an appointed designated teacher for looked after children who is appropriately trained.
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special

educational needs and disabilities (SEND).

- Child protection files are maintained as set out in Annex C of KCSIE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- All members of the board of trustees receive safeguarding training at induction, which is regularly updated.
- Staff sign to say they have read the appropriate part of KCSIE. Trustees sign to say they have read and understood KCSIE and this policy.
- Children are taught about keeping safe, including when online.
- The board does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a trustee to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- Procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.
- There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The chair of trustees will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired/let.
- Alcohol is not consumed by staff on school trips or events, on or off site.

The safeguarding link trustee – Jodie Croft

- They meet with the DSL and visit the school regularly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and headteacher, and make sure it is submitted to the KRSCP.
- They are the board of trustee's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.

- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

The headteacher (principal) – Erin Moscardini

- This policy and other safeguarding related policies and procedures (such as the staff behaviour policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff (Teachers, TAs and office and premises staff) receive safeguarding training that is updated regularly. This is in the form of annual online refresher training on the Educare platform. The DSL also delivers weekly Safeguarding updates in meetings and 2x per year on INSET days. DSL and DDSLs also receive annual Level 3 refresher training from KRSCP.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.
- There are enough staff per child (staff ratios), where relevant and applicable.
- The procedures for eating arrangements, food preparation and management of allergies are aligned with the EYFS statutory guidance and clearly explained in the school's supporting pupils with medical conditions policy.

The designated safeguarding lead (DSL) – Erin Moscardini

Erin Moscardini has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's leadership team. Twickenham Primary Academy has deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to:

- reading and following KCSIE
- always being available during school hours for staff to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities
- working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise
- contributing to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions and meetings between multiple agencies
- working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of Twickenham Primary Academy's role in making referrals about suspected abuse, neglect and exploitation
- understanding the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly
- understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements
- keeping the headteacher up to date with safeguarding issues
- having the lead responsibility for online safety, including oversight and checking the effectiveness of the school's filtering and monitoring systems and their reports
- being aware of the requirement for children to have an Appropriate Adult, as described in [PACE Code C 2019](#)
- working with the 'case manager' and LADO for child protection concerns that involve a staff member
- making sure child protection files are up to date and kept as per [section 8](#)
- making sure that all staff have access to this policy (and the wider safeguarding procedures), the policy is available publicly and reviewed annually
- making sure that all adults who work in or for the school have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSIE
- working alongside the board of trustees and headteacher to review and update procedures and how they are being implemented, including jointly completing and submitting an annual

safeguarding self-audit to KRSCP

- promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders
- encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them

A deputy designated safeguarding lead – Rebecca Johson, Kizzie Elliott, Rebecca Gillis

- is trained to the same standard as the designated safeguarding lead
- will take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead
- promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex C of KCSIE.

All school staff

- sign to say they have read the relevant part of KCSIE annually
- have a responsibility to provide a safe environment in which children can learn
- will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems
- will follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure
- will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and the LADO
- attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct)
- create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns

What staff need to know is covered in the training section of this policy.

IT provider

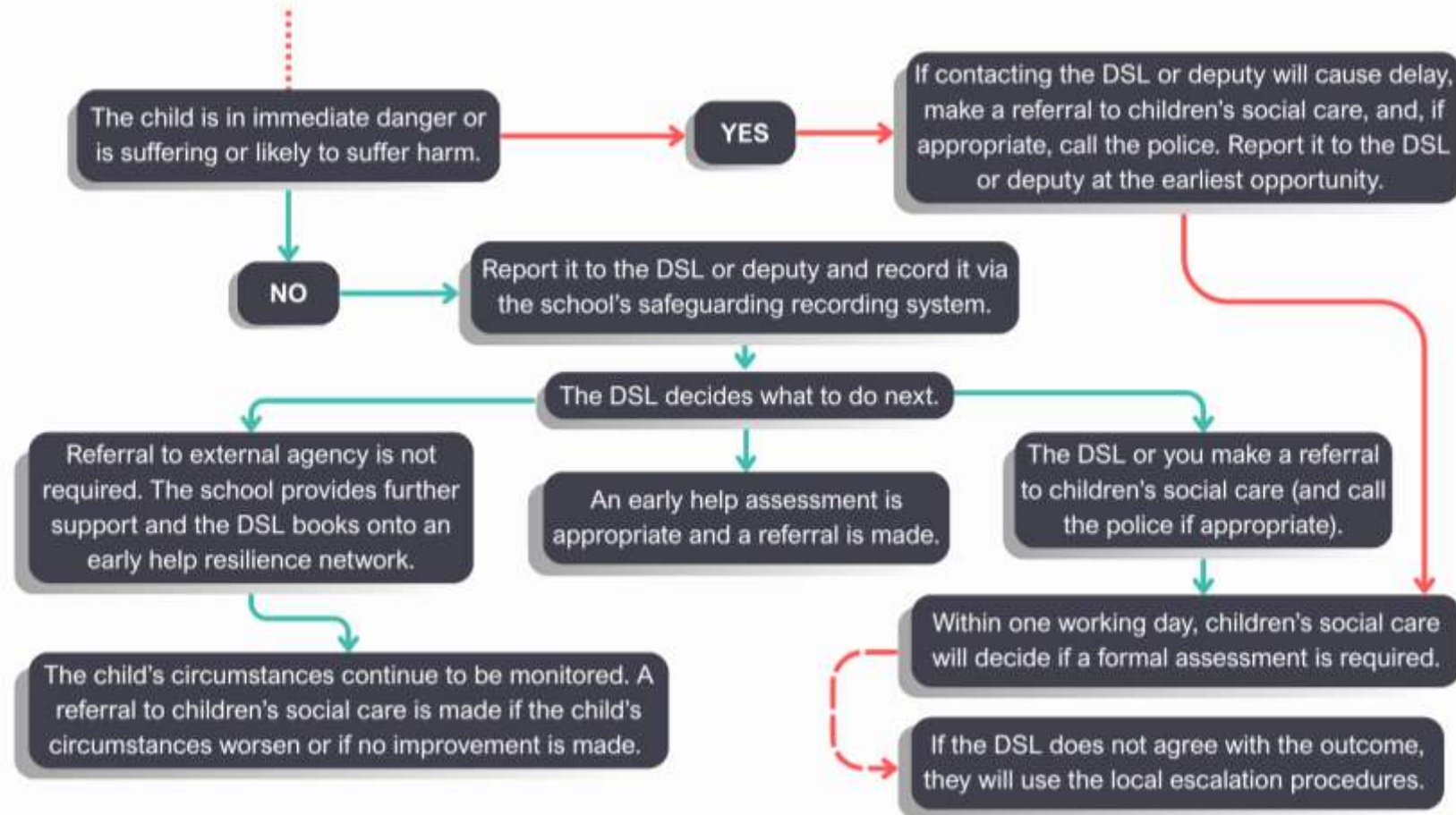
- maintains the filtering and monitoring systems

- provides filtering and monitoring reports
- completes actions following concerns or checks to the system

6. What to do if you have concerns about a child's welfare

If staff have concerns about a child's welfare, they must act on them

You have a concern about a child's welfare



In cases which also involve a concern or allegation against a staff member, refer to the full policy.

immediately by following the procedures below.

Our staff can use the [What to do if you're worried a child is being abused](#) guidance with the school's procedures. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident.** The names of the DSL and deputy are clearly advertised around the school. All visitors are given a Visitor Safeguarding Leaflet upon signing in. There are Safeguarding Process posters in all adult toilets and on all floors of the building.

[If a child is in immediate danger, or is suffering or likely to suffer significant harm](#)

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the referral. For children's services' contact details, [click here](#). If you make a direct referral, you will update the DSL or a deputy as soon as is practically possible.

Disclosures

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- Children may not feel ready or know how to tell someone they are being harmed.
- The child may not realise what is happening to them is harmful.
- They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than take what is being said on face value or making assumptions. We encourage staff to ask the child if they are OK or if they can help in any way. A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. At Twickenham Primary Academy, we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

Handling a disclosure

- Listen to them carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your and the child's evidence in any later court proceedings.

- If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

After a child has made a disclosure

- Write up the conversation as soon as possible on CPOMS.
- Make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible.
- Do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to.
- Get support for yourself if you need it.

Recording a disclosure or safeguarding concern

- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file.
- Do not ask children to make written statements themselves or sign records.

Concerns about a child who is **not** in immediate danger, or is suffering or likely to suffer significant harm

The flowchart in Section 6 explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary.

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At Twickenham Primary Academy, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set 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.

Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family, or anonymously – discuss what is happening with the Early Help Resilience Network to ensure all identified needs are supported by the appropriate agencies. AfC's early help assessment tools and plans can be found [here](#). The partnership's [Early Help Strategy](#) sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, **paragraph 18** of KCSIE.

Para.18 may change once the final version of KCSIE has been released.

Referral to children's services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL and deputy are aware of the [London safeguarding children partnership's threshold document](#), which will be used to inform their response to any safeguarding concern. **Whenever the DSL or deputy are unsure whether the threshold for a referral has been met, they will consult with the Single Point of Access.** If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The [local resolving professional differences procedure](#) will be used, where necessary.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

Teachers

For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions. All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. will speak to the DSL or a deputy and follow local safeguarding procedures.

Concerns about nudes or semi-nudes

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately, using the school's reporting procedures set out in this policy.
- **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 shown 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 a deputy.
- **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 a deputy.

Staff reserve the right to confiscate a device in the possession of a child if they have concerns about

sharing nudes or semi-nudes in relation to the device. This is consistent with the [Searching, screening and confiscation: advice for schools](#) guidance.

The DSL will follow the government's [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

The initial review meeting will consider the initial evidence and aim to establish:

- whether there is an immediate risk to any child or young person
- if a referral should 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 child or 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 children or young people involved that would influence risk assessment
- if there is a need to contact another education setting or individual
- whether to contact parents or carers of the children or young people involved – in most cases they should be involved

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

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent
- the images involves sexual acts and any child in the images or videos is under 13
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming

- they become aware of a computer-generated indecent image of a child, commonly called ‘deep fakes’ and ‘deep nudes’ i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude

If none of the above applies, we can decide to respond to the incident without involving the police or children’s services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our school’s pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children’s services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children’s services’ involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down or support the child or parent/carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL’s or a deputy’s judgement in line with the guidance. There is further information in the [Sharing nudes and semi-nudes](#) section of this policy.

Child-on-child abuse, including sexual violence and sexual harassment

Responding to allegations of child-on-child abuse

- Follow the ‘handling a disclosure’ procedure set out above. You must make a record of the allegation and inform the DSL or a deputy.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children’s services.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.
3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.
4. The police will still be informed of any criminal offences. If the child is aged under the criminal age of responsibility, the police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, discussions had, decisions made and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. This support will be personalised to the child and usually take the form of 1:1 sessions with our ELSA or a similarly trained adult. The school may contact the Emotional Health Service or the Educational Psychology Service to ensure that all children receive the correct support. Parents will be met with throughout this process and all action plans will be shared.

Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident based on the Hackett tool (diagram below). We will request the support of other agencies, such as children's services and the police, if necessary.

We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

1. **Hackett Inappropriate:** Manage internally using the behaviour policy and pastoral support.
2. **Hackett Problematic:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. **Hackett Abusive:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. **Hackett Violent:** Report to the police if a crime has been committed, such as rape, assault

by penetration or sexual assault, following the [When to call the police](#) guidance.

Normal

Developmentally expected
Socially acceptable
Consensual, mutual and reciprocal
Shared decision making

Inappropriate

Single instances of inappropriate sexual behaviour
Socially acceptable behaviour within peer group
Context for behaviour may be inappropriate
Generally consensual and reciprocal

Problematic

Problematic and concerning behaviours
Developmentally unusual and social unexpected
No overt elements of victimisation
Consent issues may be unclear
May lack reciprocity or equal power
May include levels of compulsivity

Abusive

Victimising intent or outcome
Includes misuse of power
Coercion and force to ensure victim compliance
Intrusive
Informed consent lacking or not able to be freely given by victim
May include elements of expressive violence

Violent

Physically violent sexual abuse
Highly intrusive
Instrumental violence which is physiologically and or sexually arousing to the child carrying out the violent act
Sadism

The management of children and young people with sexually harmful behaviour is complex. Twickenham Primary Academy will work with

other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case by case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- whether there may have been other people impacted by the behaviour
- the person known to be impacted by the behaviour, especially their protection and support
- the alleged instigator of the behaviour
- all children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or future harm
- the time and location of the incident and any action that can make the school safer

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against their duty to protect them and other children on a case-by-case basis. If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's services, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. As stated above, a police referral will still be made for children under the age of criminal responsibility.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up what staff need to know and any support that will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the [CPS: Safeguarding Children as Victims and Witnesses](#) advice.

Concerns about mental health

If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first.

Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to the Child and Adolescent Mental Health Service's (CAMHS) single point of access for Kingston and Richmond [here](#).

Concerns about extremism and radicalisation

Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger or there is risk to life**, contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy in the first instance.

The DSL will respond in line with the local referral pathway. They may decide to discuss their concerns with the Council Prevent lead and/or children's services and will make referrals to the police Prevent team and/or the Channel programme where appropriate. The DSL will need to seek the individual's consent when referring to the Channel programme. The DSL will report any online material they become aware of that promotes terrorism or extremism via [the Government's online service](#).

All staff and trustees can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use [this](#) link.

The Prevent lead in Richmond is:

[Naheem Bashir](#), Hate Crime and Prevent Coordinator

[Richmond and Wandsworth Prevent referral pathway](#)

See [radicalisation and extremism](#) in Appendix 1 for wider information.

How children can report concerns

In our school, it is essential that children can tell us how they are feeling and know we will take it seriously. We aim to create an environment full of 'reachable moments' which encourages children to feel safe enough to open up about their concerns. Children can confidently report any worries they have about their lives, both in and out of school, by:

- speaking to an adult they trust
- putting a written or an anonymous disclosure in a worry box/worry monster

Children are regularly and clearly taught about who they can share worries with. Notably, during assemblies and during our structured PSHE curriculum. There are also PSHE and children's safeguarding displays in the school.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's [voice of the child briefing](#). When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

7. Confidentiality

Twickenham Primary Academy takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government's [information sharing advice for safeguarding practitioners](#) supports staff who have to make decisions about sharing information. Staff are aware they can look at the [data protection in schools toolkit](#) or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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."

To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need to know basis.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them.

Notifying parents or carers

At Twickenham Primary Academy, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children's services about how and when parents or carers should be updated. It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding

of the child in a timely manner.

8. Record keeping

Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely and access will be limited to those who need it. All Safeguarding Files are stored securely on CPOMS (Safeguarding Software).

When a child leaves Twickenham Primary Academy, the DSL will make sure that their safeguarding file is transferred to the new education setting or college within 5 days of an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from their main file and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the child transferring so support can be put in place ready for when the child starts. When a child starts our school, we will make sure key staff are aware of the safeguarding file as soon as possible.

If Twickenham Primary Academy is the last school that the child attends, their safeguarding file will be securely stored by the school until their 26th birthday is reached, when it will be securely disposed of.

9. Concerns or allegations about adults in our school

If you have a low-level concern or have an allegation to make about a member of staff (see the definition for staff in section 1 of this policy) presenting a risk to children, speak to the headteacher as soon as practically possible. This includes any concerns in school, out of school, online and/or offline.

If the low-level concern or allegation is about the headteacher, contact the chair of trustees whose details are at the start of this policy.

If you are unable to report to the headteacher or chair of trustees, either because they are not available or because you believe that there is a conflict of interest, share your concerns with the local authority designated officer (LADO), whose details are at the start of this policy.

Appendix 2 sets out what the steps must be taken when allegations against staff are made; these steps are taken by the headteacher or chair of trustees as appropriate.

10. Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. Twickenham Primary Academy has a separate whistleblowing policy, which lists the procedures for raising concerns. **This can be found by clicking [here](#).**

Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as making contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk).

11. Online safety and the use of smart devices

This section summarises **Twickenham Primary Academy's** whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our E-Safety Policy which can be found on our school website, and linked [here](#).

Twickenham Primary Academy understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is to:

- have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate
- make sure technology is used responsibly and safely through education
- set clear expectations for the use of mobile phones and smart technology

We fulfil our aims by:

- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices
- educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging with parents and carers about what online safety looks like
- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to be online safely
- making sure children, staff, parents/carers, trustees and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology
- making parents, carers, children and staff aware that staff can search an electronic device they have confiscated (see [Searching, Screening and Confiscation](#))

Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

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

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example 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).

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Mobile phones and smart technology (including smart watches)

Many children have unlimited and unrestricted access to the internet via mobile phone networks, therefore children could be harmed or harm others online when at school. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is: No child will have a personal smart device (watch or phone) with them at any time on school property either during the day or during after school hours. If their parent deems that they need a phone to walk safely to school, then this will be handed to the office for safekeeping for the duration of the school day. All children's phones will be turned off whilst they are in the school office and will be locked in a filing cabinet. Twickenham Primary Academy follows the non-statutory mobile phones in schools guidance and our Mobile Phone Policy can be found on our school website.

- When watching school plays or assemblies, parents and carers are reminded not to share images online and not to film any productions etc. There is time at the end of each performance given for taking photographs of their own child.
- No personal mobile phones are used by adults in any part of our setting.
- In line with the updates to the EYFS Framework (2024) there will be no unauthorized use of any devices with cameras in our setting. If a staff member is gathering pupil voice in EYFS and requires use of a camera or any other recording device, they must ask the permission of the EYFS lead or headteacher. [Safeguarding children and protecting professionals in early years settings: online safety considerations](#)

Media recordings, audio, image and video (including digital files)

When we make media recordings of children, such as taking videos or photos, we will get the child's and their parents'/carers' consent, make sure the child is appropriately dressed and encourage the

child to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.

Filtering and monitoring

To limit children's exposure to online risks from Twickenham Primary Academy IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will make sure that:

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue
- our board of trustees reviews the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe
- the systems are effective for the age range of children and consider children potentially at greater risk of harm
- when we block online content, it does not impact teaching and learning
- filtering works across all devices including mobile devices and smart technology

Note that KCSIE has added the link to the [plan technology for your school service](#) to support schools self-assess against the filtering and monitoring standards. If the school is using this service, it may wish to refer to it here and in the school's online safety policy.

Generative Artificial Intelligence

Generative artificial intelligence (Gen AI) refers to technology that can be used to create new content (e.g. text, code and images) based on the data the models have been trained on. Our school is aware of the potential benefits of using Gen AI, such as for reducing staff's workload and freeing up teachers' time. At the same time, our school is aware of the risks and dangers associated with using Gen AI. We will use the [Department for Education's advice and guidance on using Gen AI in education](#) to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy that can be found on the school's website.

Remote education

When our children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- what their child/ren are being asked to do online, including the sites they will be accessing

and who from the school will interact with their child/ren

- the importance of children being safe online and offering advice on how to do so
- what systems our school uses to filter and monitor online use

Information security and access systems

We have procedures in place to protect our IT systems and staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's [Cyber security standards guidance](#). Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

12. Children potentially at greater risk of harm

At Twickenham Primary Academy, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of the groups of children this applies to, however there are several other groups not listed.

Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse, neglect and/or complex family circumstances. Twickenham Primary Academy recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantage them educationally.

Children's services share with us which children have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to our children who have a social worker, such as time with an ELSA or other trained adult each week; sessions with our MHST (Mental Health Support Team) workers or through the support of the Emotional Health Service.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our school works with the Virtual School to support these children.

Children looked after and previously looked after

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Staff will have the skills and knowledge to keep children looked after and previously looked after safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is

not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The designated teacher for children looked after is Rebecca Johnson. The designated trustee for children looked after is Jodie Croft.

The statutory guidance [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the school has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

We are aware that some children are looked after by individuals other than their parents. The charity [Kinship](#) describes kinship carers as ‘family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren’t able to’. We will seek and follow the advice from the Virtual School on how to best support children and their families who are under formal or informal kinship arrangements.

Children with special educational needs, disabilities and health issues

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND. For example, using symbols and Makaton signs for key words; delivering key curriculum content in small group or 1:1 an making use of pre-teaching; sharing resources with parents to enable follow up sessions to happen at home.

Twickenham Primary Academy is aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying), than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

We offer additional pastoral support for children with SEND, including

- Zones of Regulation stations in every classroom.
- 1:1 ELSA Sessions
- Group Social Communication Sessions
- Social Thinking Interventions
- Working with the MHST and Emotional Health Service
- Advice from the Educational Psychologist and other professionals who may be supporting the child if they have an Education Health and Care Plan (EHCP).

Children who are lesbian, gay, bisexual, transgender or gender questioning

We recognise that children may be targeted by other children if they are, or are perceived to be, part of the LGBT+ community. Our school strives to create and maintain a culture of inclusivity and a sense of belonging for all children. We aim to create a safe and open space where children feel comfortable speaking out and sharing their concerns. Any discrimination we become aware of is firmly addressed in line with this policy and the behaviour policy. The school will also educate the child who has discriminated, providing them with the support they need to reduce the risk of this behaviour happening again.

When children are questioning their gender, we will provide in-school support and engage external agencies for additional advice, always considering the child's individual needs. Unless it is unsafe to do so, we will work together with the child's parents and carers to ensure decisions are made with the child's input where possible, and always in their best interest.

13. Identified areas of risk for our school

Area of Risk	How we mitigate this
Areas on the school site where children feel at risk – children do not like the the ground floor or UKS2 boys' toilets.	We have renovated the toilets to provide fullheight doors, bright lighting and new bright flooring. We will continue to listen to the children's voice on this area. We clean the toilets frequently and ensure that the children understand how to behave in these areas.
Accessing PE off-site. Our outside PE provision is at Twickenham Green with swimming being at St Catherine's Prep School.	<ul style="list-style-type: none"> • Clear walking routines and adequate supervision. • The adult leading the session does a risk assessment walk before each lesson to ensure that members of the public are not posing a risk to children learning PE. • Children are clearly informed and taught the correct behaviour and routines for safely walking to and from The Green and how to avoid danger from members of the public.

14. Lettings and off-site arrangements

Twickenham Primary Academy's Lettings Policy can be found on the school website. When services or activities are provided by the board of trustees, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's [Keeping children safe during community activities, after-school clubs and tuition](#) non-statutory guidance. This includes checking that the provider has completed the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

Extended school and off-site arrangements

Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, including work experience placements, we will ensure that effective child protection arrangements are in place that are informed by thorough risk assessments.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We know that children who attend alternative provisions often have complex needs and we are aware of the additional risk of harm that these children may be vulnerable to. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision, i.e. checks that we would otherwise perform on our own staff.

We follow the [statutory guidance for alternative provision](#) and [Achieving for Children's alternative provision policy](#). The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk, and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement where safeguarding concerns arise and reserve the right to terminate the arrangement if concerns are not adequately addressed.

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

Although it is not possible to obtain criminality information from the DBS about adults who provide homestays abroad, we will liaise with partner schools abroad to establish a shared understanding of, and agreement to the arrangements in place for the visit. We may consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may

be possible in respect of those providing homestay outside of the UK. We will make parents aware of the agreed arrangements.

15. Training

Designated safeguarding lead

The designated safeguarding lead will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. Minimally, the designated safeguarding lead (and deputies) will:

- attend the level 3 multi-agency local safeguarding children partnership training within 12 weeks of starting this role and refresh this every two years
- stay up to date with safeguarding knowledge, resources and changes
- have a good understanding of, and form a good relationship with, the Kingston and Richmond safeguarding children partnership by attending the termly DSL forums, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer
- attend Prevent awareness and safer recruitment training, and ensure they have a good understanding of harmful sexual behaviour
- receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff
- For early years providers, add: ensure safeguarding training attended by the DSL and provided for staff covers the criteria set out in the EYFS statutory guidance under Annex C
- make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity
- gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at Twickenham Primary Academy.

Trustees

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be regularly updated and

- the board of trustees will make sure the designated safeguarding lead has the time and resources to attend training
- the chair of trustees will receive training about managing allegations against the headteacher

to assist them in the eventuality that an allegation is made

- the board of trustees will make sure that online safety is a theme in all staff training
- senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training
- the link safeguarding trustee will make sure that staff and trustees attend safeguarding training at induction and regularly after that
- the link safeguarding trustee will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance

The board of trustees will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. Twickenham Primary Academy and Omnia Learning Trust have a separate safer recruitment policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable. This can be found [here](#).

All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive core safeguarding and child protection training (including online safety) at induction that is reviewed and refreshed annually using the Educare Platform – all staff receive a training certificate which is kept in their HR file. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe. All staff (including office and premises staff) receive training delivered by the DSL twice per year which is then checked through quizzes and surveys to ensure that staff feel confident in their understanding. Teaching staff and teaching assistants have weekly safeguarding updates in their meetings and again the understanding of this is checked through quizzes and surveys. Staff also take part in scenario discussions each week to refresh knowledge.

Our training ensures that staff:

- can spot the signs of possible abuse, neglect and exploitation
- know the school's safeguarding policies and procedures and feel supported and confident to carry them out within their role
- have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral
- know what to do if a child tells them they are being harmed, including how to manage this

information confidentially

- understand the reasons why children may not feel ready or know how to tell someone that they are being harmed
- receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas
- understand what cyber security the school has in place to keep children and staff safe when online at school and how to report any issues
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues
- know that children who identify as or are perceived be LGBT can be targeted by other children
- Anyone responsible for children in early years has received paediatric first aid training to be counted within staff-children ratios

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

Specify the regularity and type of training received by staff, governors/trustees and volunteers in your school.

The headteacher will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

The designated teacher for children who are looked after (CLA)

We follow the [Role and responsibilities of the designated teacher](#) statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with AfC's [Virtual School](#), accessing their training and forums to stay up to date.

16. Teaching and learning

At Twickenham Primary Academy, we aim to prevent our children from coming to any harm. We recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our curriculum meets the needs of all children, including those with SEND and/or have been abused.

PSHE and RSE are taught using the Jigsaw Scheme of work. Every child receives a weekly PSHE lesson.

- Assemblies link to safeguarding themes including Anti-Bullying Week; the NSPCC ‘Speak Out Stay Safe’ programme and ‘PANTS’ programme; Children’s Mental Health week among others.

- There are regular parent safeguarding events including: RSE Curriculum evenings; Mobile Phone and Online Safety evenings and safeguarding updates relating to current crazes from National Online Safety included in our weekly newsletter as needed.

- If a disclosure is made during an RSE or PSHE lesson, teachers will ensure that the child who has made the disclosure feels safe and has time to talk away from the class. The disclosure will be recorded as above and the correct steps will be followed to ensure that all pupils are safe.

If specific safeguarding issues arise during the school year, the headteacher will make sure the curriculum is adapted to cover current issues.

17. Linked policies

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include the below policies.

- Behaviour
- Physical intervention
- Anti-bullying
- Safer recruitment and selection
- Staff behaviour policy/code of conduct
- Whistleblowing
- Procedure for managing allegations against staff (including low-level concerns)
- Health & safety
- Attendance
- Curriculum (such as PSHE and RSE)
- Supporting children with medical needs
- Online safety
- Risk assessment
- Intimate care
- Mobile phone policy

Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSIE guidance.

Abuse is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing, or experiencing the effects of domestic abuse. We are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Our staff will be aware that technology is a significant part of many safeguarding issues.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- communicating 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 online 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. 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

We use the following guidance to help identify and address cases of neglect.

[Handling Cases of Affluent Neglect in Schools](#)

[Local partnership guidance](#), including the child neglect toolkit

Indicators of abuse

The following list, provided by the [NSPCC](#), covers some common indicators of abuse and neglect.

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which completely cover their body
- patterns of repeated lateness or absence

It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need ‘absolute proof’ that the child is at risk.

[Specific safeguarding concerns](#)

This section is based on Annex B of KCSIE. Annex B includes further information about other

safeguarding issues to be aware of. **All concerns under this section should be addressed in line with the [section 6](#) of this document, unless stated otherwise.**

Children absent from education

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at Twickenham Primary Academy to support us in identifying risk of harm/abuse and acting early. Our staff will be aware of our school's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. To support the school's procedure for addressing children missing or absent from education, we make sure we have more than one emergency contact number for each child. We work in partnership with AfC when patterns of absence give rise to concern, including notifying them when a child leaves our school without a new school being named.

In line with the EYFS, attendance will also be monitored for children attending our setting who are not of statutory school age. We will follow the school's safeguarding procedures if we have any concerns about prolonged absences or if a child is absent without notification from the child's parent or carer despite the school making attempts to contact them. This may include a referral to children's services and/or requesting a police welfare check.

Our attendance policy and procedures are set out in a separate document, which can be found [here](#). The school follows the government's [Working together to improve school attendance](#) statutory guidance.

Useful information:

[Local partnership guidance](#)

[Children Missing Education statutory government guidance](#)

Contextual safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Twickenham Primary Academy will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area, we will share this information with AfC's contextual safeguarding team. If there is a specific concern about a child, we will consult with children's services.

Useful information:

[Local partnership guidance](#)

[Achieving for Children's Risk Outside the Home page](#)

[Tackling Child Exploitation multi-agency Practice Principles](#)

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be

present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development
- become pregnant

See the [Sharing nudes and semi-nudes](#) section below for details about ‘sextortion’.

Twickenham Primary Academy follows the London Child Protection Procedures regarding [sexual exploitation](#). Further information on signs of a child’s involvement in sexual exploitation is available on [The Children’s Society’s website](#) and Home Office’s [Child sexual exploitation: definition and guide for practitioners](#).

Child criminal exploitation (CCE)

At Twickenham Primary Academy, we recognise children involved in CCE are victims, despite their engagement in crime. A child may have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. CCE can include children being forced and/or manipulated:

- to work in cannabis factories
- into moving drugs or money across the country (county lines)
- to shoplift or pickpocket
- to threaten serious violence to others
- into committing vehicle crime

Serious violence

Staff at Twickenham Primary Academy will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance

- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful information:

[Preventing youth violence and gang involvement government guidance](#)

[Criminal exploitation of children and vulnerable adults: county lines government guidance](#)

[London Child Protection Procedures on gang activity and serious youth violence](#)

School-related weapons incidents

Twickenham Primary Academy follows the [AfC School Related Weapons or Potential Weapons Incidents Protocol](#). We will inform children's services and the police of any incident involving a weapon or potential weapon. Our teachers have the legal power to search children without consent for a number of 'prohibited items', including weapons covered in the government's [Searching, screening and confiscation](#) guidance.

Twickenham Primary Academy recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. Twickenham Primary Academy will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

[Children who run away or go missing from education, home or care](#)

Twickenham Primary Academy recognises that children who run away, go missing or are absent from education and their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance [Children Who Run Away or go Missing from Home or Care](#) requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with AfC or other relevant local authority, Twickenham Primary Academy will facilitate RHIs, both in terms of releasing the young person from their normal

timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place. We will follow KRSCP's [missing children](#) procedure when required.

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. Twickenham Primary Academy recognises 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.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. Twickenham Primary Academy aims to promote positive mental health for all staff and children. To do so, we take into account the government's [Promoting and supporting mental health and wellbeing in schools and colleges](#) guidance.

Our mental health lead is: Erin Moscardini

If there are any concerns with the mental health of a child or adult at Twickenham Primary Academy, then staff can talk with the SMHL where referrals to local agencies including CAMHs will be discussed. In the short term, children's mental health can be supported through the use of resources on our SEMH provision map:

Twickenham Primary Academy		
Whole School Provision Map – Area of Need: Social, Emotional and Mental Health		
Wave 1 – Quality first teaching for all pupils	Wave 2 – Interventions for catch up	Wave 3 / Wave 3+ High end need strategies
<ul style="list-style-type: none"> • Clear and consistent behaviour expectations and framework, • Whole school and class rules • Whole school reward systems – stickers, certificates, values certificates, house points • School and class routines and visual timetable • Structured class routines • Weekly Jigsaw circle time and progressive PSHE curriculum • Displays and teaching linked to Zones of regulation • TA / LSA support in class • Adaptations to class layout – all classes have a calm corner and access to regulatory resources (e.g., fidgets) • Worry box / worry monster • Specific skills for behaviour taught during whole class PSHE or circle time • Assemblies planned linked to understanding of mental health • Relationships prioritised throughout the school • Strategies for independent working (e.g., 3Bs) modelled • Buddy system for new pupils • Agreed visual symbols if a pupil is distressed or not coping • Music • Personalised work station or equipment 	<ul style="list-style-type: none"> • Behaviour plan (IBP / IEP) • Communication book • Access to quiet lunchtimes • Agreed time out space in class • Arranged times to speak with key adults • Use of a 5 point scale or personalised Zones of Regulation tool kit • Regular meetings between home and trusted adult <p>Specific interventions</p> <ul style="list-style-type: none"> • Lego Therapy • Social Skills • Mindfulness • Time to Talk • Tum Taking • Anxiety 1:1 or group support • Social stories • Emotional Literacy • ELSA 	<ul style="list-style-type: none"> • Individual reward system • 1:1 sessions with PMHW/EHSS worker via 6AC as needed • Pastoral Support Plan [PSP] • Personal Education Plan [PEP child in care] • Individual arrangements for examinations • 1:1 Weekly (or more often) ELSA sessions • Additional planning and arrangements for transition for next stage • Positive handling strategies and risk assessment in place • Self-harm risk assessment • 1:1 support from EHSS for parents if self-harm is noticed • Reduced timetable • Support for EBSA <p>Support and guidance from outside agencies</p> <ul style="list-style-type: none"> • Healthy Young Minds • Mind • Emotional Health Service • CAMHS • School Nurse • Education Welfare Officer • Virtual School (LAC) • Educational Psychologist

Useful information:

[Local partnership guidance](#)

[Mind](#)

[NSPCC: Child mental health](#)

[Drugs and alcohol](#)

Through our RSHE curriculum, we provide age-appropriate education on the risks and effects of drug, alcohol, tobacco and vapes. The school prioritises the safety and wellbeing of children who use, or are at risk of using, drugs or alcohol by adopting a safeguarding-first approach. We understand that drug and alcohol use can be an indicator of underlying vulnerabilities or harm. Staff are trained to recognise the signs of drug and alcohol use and its potential links to other safeguarding concerns. We will work together with external agencies, such as children's services, health professionals and the police, to ensure children receive appropriate early help and interventions. Where there is concern that a pupil is under the influence or that drugs, alcohol, tobacco or vapes are present on school premises, we will act in line with our first aid procedures, behaviour policy and, where applicable, the [When to call the police](#) guidance.

Useful information:

[Local partnership guidance](#)

[Domestic abuse](#)

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The [Domestic Abuse Act 2021](#) states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

Twickenham Primary Academy has signed up to the police initiative [Operation Encompass](#), a system that ensures the DSL is informed when police are called to an incident of domestic abuse and a child/children in the household experienced the incident, before the child or children arrive at school the following day. Once informed, the DSL or a deputy will provide silent support according to the child's needs and update records about their circumstances.

Useful information:

[Local partnership guidance](#)

[Homelessness](#)

Twickenham Primary Academy recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the

family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Child-on-child abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse between children in an intimate relationship
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online)
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online)
- sexual harassment, such as sexual comments, jokes and online sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

Older children may use any type of child-on-child abuse to 'recruit' younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to 'recruit' other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to be impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Twickenham Primary Academy does not tolerate child-on-child abuse. We know that even when there are no reported cases, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For children to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways.

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.

- The behaviour policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.

Child-on-child sexual violence and sexual harassment

Our school is aware of Ofsted's [Review of sexual abuse in schools and colleges](#). The review was carried out as a result of the large amount of testimonies shared on the [Everyone's Invited](#) website, which highlighted the prevalence of sexual harassment and sexual violence.

We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exists on a continuum and may overlap. They are never acceptable and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening here at Twickenham Primary Academy.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND
- children who are LGBT+ or who are perceived to be LGBT+ by their peers

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of safeguarding. Twickenham Primary Academy follows Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the [child-on-child abuse section](#) of this policy.

Harmful sexual behaviours (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. Twickenham Primary Academy recognises that children displaying harmful sexual behaviours have

often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputy will:

- have a good understanding of HSB
- assist in planning the curriculum aimed at preventing HSB
- ensure staff spot and report inappropriate behaviour to prevent an escalation
- incorporate our approach to sexual violence and sexual harassment into the whole school approach to safeguarding

Twickenham Primary Academy's curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful information:

[Local partnership guidance](#)

[Centre of Expertise on child sexual abuse: Resources for education settings](#)

[NSPCC Harmful Sexual Behaviours](#)

[Stop it Now](#)

Upskirting

Twickenham Primary Academy will ensure that all staff and children are aware that 'upskirting' is a criminal offence and will not be tolerated. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

Twickenham Primary Academy will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

Sharing nudes and semi-nudes

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 ([UKCIS, 2024](#)). Alternative terms used by children and young people may include 'dick pics' or 'pics'. It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the [alert guidance](#) and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

Safe relationships and reporting concerns are taught in our Jigsaw PSHE and RSHE curriculum.

So-called 'honour'-based abuse, including FGM and forced marriage

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

Female genital mutilation (FGM)

Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

Section 6 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM has been carried out or suspects that a child is at risk of FGM.

Signs that FGM might happen:

- a relative or someone known as a 'cutter' visiting from abroad
- a special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'
- a female relative, like a mother, sister or aunt has undergone FGM

- a family arranges a long holiday overseas or visits a family abroad during the summer holidays
- a girl has an unexpected or long absence from school
- a girl struggles to keep up in school
- a girl runs away – or plans to run away - from home ([NSPCC](#))

Signs FGM might have taken place:

- having difficulty walking, standing or sitting
- spending longer in the bathroom or toilet
- appearing quiet, anxious or depressed
- acting differently after an absence from school or college
- reluctance to go to the doctors or have routine medical examinations
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed ([NSPCC](#))

Useful information:

[Female Genital Mutilation Statutory Guidance](#)

[Local partnership guidance](#)

[National FGM Centre](#)

Forced marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:

[Freedom charity](#)

[Handling cases of forced marriage guidance](#)

[National FGM Centre](#)

Modern slavery

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and

that some victims are children.

Common places modern slavery occurs includes:

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful information:

[Modern slavery: how to identify and support victims](#)

Private fostering

A private fostering arrangement is when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

Twickenham Primary Academy is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

Useful information:

[Looking after someone else's child](#)

[Local partnership guidance](#)

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our [statutory duty](#) to prevent children from becoming terrorists or supporting terrorism seriously.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

To prevent children from being radicalised into terrorism, we make sure:

- our filtering and monitoring systems will prevent and protect children from accessing extremist material
- children are taught about British Values and staying safe online via the curriculum
- children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views
- staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible
- the DSL attends Prevent awareness training and is aware of the latest guidance
- we perform a risk assessment assessing how our learners and staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local safeguarding children partnership

The [Educate against hate](#) government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends

- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

If you have concerns that a child may be at risk of radicalisation or involvement in terrorism, go to [section 6](#).

Useful information:

[Local partnership guidance](#)

[Protecting children from radicalisation: the prevent duty](#)

Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non emergency, 24/7 number: 101.

Useful information:

[Metropolitan Police advice](#)

[Short Youtube introduction video](#)

[National FGM Centre](#)

Fabricated or induced illnesses

Staff at Twickenham Primary Academy are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting children with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful information:

[The Royal College of Paediatrics and Child Health \(RCPCH\) guidance](#)

Appendix 2:

TPA Allegations against staff (including low-level concerns) Process

Policy Review Information

Review Frequency	Annual and/or following any updates to national or local guidance and procedures
Statutory Policy	Yes
Policy owner	TPA Principal
Lead Reviewer	TPA DSL
Approver and date of last approval	TPA Principal: September 2025
Key review dates	Changes made
09/2024	Policy Reviewed by Principal against latest guidance to include KCSiEd 2024
09/2025	Policy Reviewed by Principal against latest guidance to include KCSiEd 2025

Section 1: Allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. 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 the school is in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO). We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Allegations about staff should be reported to the Head Teacher, or if the Head Teacher is not available the Deputy Head Teacher. If the Head Teacher is the subject of the allegation, the matter should be referred to a senior member of the Trust Executive Team.

An 'Investigating Manager' will lead any investigation. This will be the Head Teacher (or Deputy Head Teacher) or the senior member of the Trust Executive Team, unless he or she delegates the

investigation to a member of the school's senior leadership team. The Investigating Manager will use the template at Annex 1 of this policy.

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.

Any suspension of a member of staff should only happen following a risk assessment in line with the risk assessment template at Annex 2 of this policy and following review of the OLT Disciplinary Policy.

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 academy trust

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Investigating 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 Investigating 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 Investigating Manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the Investigating 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 Investigating 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 Investigating 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

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 Investigating Manager will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the investigation is carried out
- 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. The time periods referenced below are within school term times only and exclude school holidays:

- 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 Investigating 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 Investigating Manager will consider how best to facilitate this. The Investigating 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 Investigating 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 Investigating 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 Investigating Manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

After any cases where the allegations are *substantiated*, the Investigating 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 Investigating 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
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as stated in 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 OLT Disciplinary Policy and the school's 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

Annex 1:

Template report: investigating safeguarding allegations against staff

How to use this template

- › This report should be filled in by the Investigating Manager and signed off by the local authority designated officer (LADO)
- › Refer frequently to your school's safeguarding policy and the statutory guidance [Keeping Children Safe in Education](#) (see part 4 especially) as you fill in this report. This is to make sure you carry out your investigation in line with safeguarding requirements
- › Keep this document confidential and only share it with necessary parties, as advised by your LADO. The school **must** make every effort to maintain the confidentiality of those involved and to guard against unwanted publicity while an allegation is being investigated or considered
- › Once the investigation has concluded, keep this report as a comprehensive record of the allegation and investigation – for guidance on how to store the report see this [article titled Allegations against staff: investigation reports](#)
- › If you decide with your LADO that a full investigation into an allegation is not necessary, you can still fill in the first section of this template (investigation log) to keep a record of this decision
- › Please note that this template is not a step-by-step guide on conducting an investigation

Instructions for filling in the template

- › Adapt this template to the specific needs of your school and the nature of the allegation. Delete any sections irrelevant to your context
- › Fill in as much detail as possible and update this document every time an action is taken or a decision is made. Having a full record of the investigation will help you make sure that you acted according to your policies and requirements, if later questioned
- › Instructions and prompts are in **yellow highlight** to help you fill in the report – delete these as you go along

	NAME	JOB TITLE / POSITION
Investigating Manager		E.g. Headteacher
Local authority designated officer (LADO)		
Subject of allegation		
Children or young people involved		
Allegation made by (if different from above)		E.g. parent, classmate, class teacher
External agency point of contact	Include contact information	Add more rows below if needed

DATE OF INVESTIGATION START:

Investigation log

Record **all** actions taken and when they happened. This will help you make sure that you acted according to your school policies and in a timely manner, if later questioned.

DATE	ACTION AND DETAILS
	<p>Actions might include:</p> <ul style="list-style-type: none"> • Details of conversations with your LADO or safeguarding partners where you: <ul style="list-style-type: none"> ◦ Discussed and decided whether an investigation is necessary ◦ Sought advice about the investigation • The appointment of an external investigator, if required • Interviews • Disciplinary action taken • Any communication with the subject of the allegation • Review meetings (conducted fortnightly or monthly depending on the complexity and length of the investigation) • Events outside your control that delay the progress of the investigation, such as waiting for action from the police or local safeguarding partners <p>Make sure you write down:</p> <ul style="list-style-type: none"> • Who was present at all meetings • Your reasoning for actions and decisions • Any decisions not to take a specific action, and why
	<p>Insert more rows if needed</p>

Disclosure

- › Record the details of the initial conversation when an allegation was disclosed (it may not be practical to take notes at the time, but make a record as soon as possible to ensure accuracy)
- › Try to record the exact wording of the disclosure statement, rather than summarising it
- › If you have a dedicated school platform for recording disclosures, copy the text into this report so you have a complete record of the investigation in one place

DISCLOSURE BY	
DISCLOSURE TO	
DATE AND TIME OF DISCLOSURE	
DATE AND TIME OF RECORD MADE (IF DIFFERENT TO ABOVE)	
DETAILS OF DISCLOSURE	<p>Include as much detail as possible about:</p> <ul style="list-style-type: none"> • When and where the alleged incident occurred, and what happened • When and where the disclosure happened • Any possible evidence • Any immediate safeguarding or child welfare concerns • When and how the disclosure was reported to the Headteacher/Investigating Manager <p>Include the appendix number of any relevant documents, such as an email informing the Investigating Manager of the allegation</p>

Safeguarding actions

Record any safeguarding actions or concerns – copy these over from your investigation log above so that you have all your safeguarding actions in one place.

DATE	ACTION AND DETAILS
	E.g. any collaboration with local safeguarding partners, and your rationale for making safeguarding decisions
	Insert more actions, as appropriate

Investigation evidence

Fill in details of evidence collected in the course of the investigation – if necessary, copy over any relevant information from your investigation log so you have all your investigation evidence in one place.

Evidence collected	E.g. evidence from: <ul style="list-style-type: none"> › Witnesses › Local safeguarding partners
Evidence not collected	Record any evidence that you were unable to attain, including any potential witness statements you could not take.

DATE/TIME	WITNESS NAME	PERSONS PRESENT	DETAILS OF INTERVIEW / WITNESS STATEMENT
		For example: <ul style="list-style-type: none"> • Interviewer • Any note-takers • Anyone present to provide support 	Record details of witness interviews carried out, including: <ul style="list-style-type: none"> • Their account of events • The method the interview was recorded, i.e. was an audio recording taken or was someone taking notes? • Any anonymous witness statements <p>The subject of the allegation should also be able to make a statement and give evidence – include that here as well.</p>

SUMMARY OF EVIDENCE	
Facts established	
Facts not established	
Any other relevant information	

Investigation outcome

If you are investigating multiple allegations, copy out the table below and fill it in for each allegation. You should come to a judgement on each point separately.

STEPS TAKEN	EVIDENCE/DETAILS
Allegation outcome	<p>Delete as appropriate:</p> <p>Substantiated – there is sufficient evidence to prove the allegation</p> <p>Malicious – there is sufficient evidence to prove the allegation and there has been a deliberate act to deceive or cause harm to the subject of the allegation</p> <p>False – there is sufficient evidence to disprove the allegation</p> <p>Unsubstantiated – there is insufficient evidence to either prove or disprove the allegation. This term implies neither guilt nor innocence</p> <p>Unfounded – there is no evidence or proper basis which supports the allegation being made</p> <p>Include rationale and justification for this decision. It should be based on the evidence from the investigation.</p>
Action taken	<p>Record any disciplinary action taken as a result of the investigation outcome.</p> <p>Detail who was present and what was said at any meetings, including governor meetings.</p>
Referrals and disclosures	Record any referrals to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA), informing them of the allegation and outcome.
Statement records of	What records will be kept about the investigation, and in what format?
Review	<p>Details of a reflection on the investigation from the Investigating Manager and LADO, and any lessons learned to determine if your procedures can be improved in the future. This could include:</p> <ul style="list-style-type: none"> • Changes to school policy to prevent similar incidents happening in the future • Changes to the investigation process

INVESTIGATING MANAGER

[Insert Name and Signature]

[Date]

LOCAL AUTHORITY DESIGNATED OFFICER

[Insert Name and Signature]

[Date]

Appendices

Attach the listed documents to the end of the report.

APPENDIX NUMBER	PAGE NUMBER	NAME OF DOCUMENT
1		E.g. School safeguarding policy
2		E.g. Copy of email to the Headteacher containing a disclosure statement
3		Add documents as appropriate

Annex 2: Suspension Risk Assessment

Disciplinary Suspension – Risk Assessment (confidential once completed)

To be completed by the person with authority to make a decision to suspend. This risk assessment must be completed for individuals where a serious allegation has been made which warrants disciplinary investigation, to consider all the risks and whether suspension is appropriate in the circumstances.

This form may also be used when considering serious allegations against third-party workers/volunteers.

School		Name	
Post		Date	
A. Brief outline of the allegations and evidence			
Has the employee been notified of the allegations?	YES/NO	<i>If yes, what was their initial response. If no, give reasons</i>	
B. The Risks			
	YES/NO	Details	
Are the allegations so serious that dismissal for gross misconduct could be a possible outcome?			
Is there a clear risk of re-occurrence of the misconduct which, if it occurred, might cause harm to people, property or the employer's reputation?			
Is there is a tangible risk to property or person?			
Is this a safeguarding matter which meets the threshold for referral to LADO (harm test) i.e. the allegations are that the employee has: <ul style="list-style-type: none"> behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children. 		<i>If yes, what is LADO advice about the risk of the employee remaining in post?</i>	
Is the matter subject to a Police investigation?		<i>If yes, what is LADO advice about the risk of the employee remaining in post?</i>	
Could allowing the employee to remain in work hinder the investigatory process e.g. by damaging evidence or influencing witnesses?		<i>Give reasons</i>	
Is there a statutory prohibition in effect which renders employment unlawful?			
If the answer to all of the questions above is NO, is there any other reason why the person should not remain in their role during the investigation/ disciplinary procedure?		<i>Give details</i>	

<i>If the answer to all of the questions in Section B is NO, the individual can remain in their role. The situation should be monitored and the Risk Assessment re-visited in the light of any new information.</i>		
<i>If the answer to any of the questions in Section B is YES, Complete Section C to seek to mitigate or remove the risks</i>		
C. Alterations to work		
	YES/NO	Details
Could duties be amended/reallocated and would this remove or sufficiently mitigate the risk(s)?		
Could the individual be redeployed to another role/work location and would this remove or sufficiently mitigate the risk(s)?		
Can additional supervision for the individual be introduced and would this remove or sufficiently mitigate the risk(s)?		
Would removal of access to systems, resources or people remove or sufficiently mitigate the risk(s)?		
Would it be appropriate to grant a short period of authorised paid leave to allow further investigation?		
Are there any other measures that could be applied to remove or sufficiently mitigate the risk(s), whilst allowing the individual to remain in work?		
<i>If the answer to any of the questions in Section C is YES, the arrangements should be applied. The situation should be monitored and reviewed regularly and the Risk Assessment re-visited in the light of any new information.</i>		
Effective Date of alternative arrangements		
Date(s) of review(s)		
<i>If the answer to all of the questions in Section C is NO i.e. risks cannot be removed or mitigated by other means, it may be reasonable to suspend. Complete Section E</i>		
D. Suspension Confirm in writing to employee as soon as possible		
Reason for suspension (see Section B) <i>Be precise e.g. to safeguard children/property/data or if to prevent interference with investigation explain how this might occur if not suspended.</i>		
Effective Date of suspension		
Date(s) of review(s) <i>(suspension must be kept under regular review and employee updated in writing)</i>		
Are there any specific indicators of how the employee's mental health may be affected by suspension?		
What measures are being put in place to support the employee?		
Who is the named contact for the employee (for their welfare and work related updates)?		
E. Restrictions during alternate work arrangements / suspension <i>Consider whether restrictions are relevant, necessary, reasonable and proportionate and enter details of restrictions (e.g. permission required)</i>		
Visiting Premises		
Accessing school network/IT systems		
Contact with school staff		
Contact with wider school community		
Other restrictions		

F. DBS Referral <i>A referral must be made if you withdraw permission for a person to engage in regulated activity with children or you move the person to another area of work that isn't regulated activity and the harm test is satisfied. https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs</i> <i>NB a further referral may be necessary at the conclusion of the case.</i>	
Is a DBS referral necessary at this stage?	YES / NO
If YES, date of referral	

G. Reviews <i>Suspension/alternatives should be in place for as short a period as possible, regularly reviewed and the employee updated.</i>	
Date of review	Notes (new information, changes to conditions, decision (extend/amend arrangements,))

Signed		Date	
Position			