West Twyford Primary School

West Twyford
Primary School

Safeguarding and Child Protection Policy

Last reviewed on:	Autumn 2026
Next review due by:	Autumn 2027
Approved by:	FGB

Safeguarding and Child Protection Policy

This policy incorporates policy, advice and guidance in the DfE *Keeping Children Safe in Education* document, September 2025

1. Aims of the Safeguarding and Child Protection Policy

In accordance with our school's vision, which is to develop happy, inquisitive and resilient life-long learners who strive for excellence in all they do; learners who are respectful, polite and kind, and who take pride in belonging to our school and the wider community, West Twyford Primary School is committed to providing an environment where children achieve together and feel safe, secure and are able to trust the adults whose responsibility it is to care for them. We will:

- promote a culture in which pupils and adults develop an understanding and respect for each other.
- develop pupils' skills in keeping themselves and their friends safe. The welfare of the child is paramount and must be promoted and safeguarded at all times.
- ensure that confidentiality is respected as far as possible without compromising the safety of the child.
- keep the pupils in our care safe. All pupils regardless of race, gender or disability have the right to be protected.
- develop in pupils the knowledge that their concerns will be fairly and seriously considered.
- develop in all adults the skills, sensitivity and knowledge when caring for pupils, who have suffered abuse.
- ensure that adults feel secure when dealing with child protection matters and that they recognize their responsibilities in identifying and reporting possible cases of abuse.
- promote a multi-agency approach with regard to Child Protection in line with local and national policy.

Purpose of Policy

- Identify the names of responsible persons in the school and explain the purpose of their role.
- Describe what should be done if anyone in the school (including EYFS) has a concern about the safety and welfare of a child who attends the school.

- Identify the particular attention that should be paid to those children who fall into a category that might be deemed “vulnerable”.
- Set out expectations in respect of training.
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff.
- Outline how complaints against staff will be handled.
- Set out expectations regarding record keeping.
- Clarify how children will be kept safe through the everyday life of the school including EYFS.
- The policy is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of the School.
- Include a section on Female Genital Mutilation, in line with national recommendations.
- Include a section on the PREVENT Strategy, in line with national recommendations.
- Include a section on child-on-child abuse.

A copy of this policy will be made available on the School's website.

Legislation and statutory guidance
This policy is based on the Department for Education’s statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children
- Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage 31 March 2021.

2. Definitions

Safeguarding and promoting the welfare of children means:

- Providing support and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether this is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

(This definition is in line with Working Together to safeguard children 2023)

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (nude and semi-nude photos or videos) by children

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Children includes everyone under the age of 18.

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA

- The chief officer of police for a police area in the LA area

3. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEND)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

4. Responsibility for Child Protection Issues

Child protection issues are the responsibility of all staff involved in the care of our pupils, i.e. teaching staff, TAs, LSAs, SMSAs, governors, site manager, administrators, kitchen staff, supply teachers, students and volunteers. All adults should take the attitude that safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised. No adult can say it has nothing to do with them. If in any doubt they should contact the Designated Safeguarding Lead (DSL). All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

The Designated Safeguarding Lead (DSL) currently is the Headteacher. In her absence any child protection issues should be reported to the Deputy Headteacher who are is a fully trained DSLs, or the teacher in charge that day. The child protection issue should also be recorded on the CPOMS system.

Headteacher:	**Matthew Shapland 020 8965 6858**
Deputy Headteacher:	**Laura Archer 020 8965 6858**
Assistant Headteacher:	**Helen Wishart 020 8086 6858**
SENDCO	**Julia Croyden 020 8965 6858**

The **nominated child protection governor** for this school is: Nimisha Carver and, in her absence, the CP governor is Elton Xhetani (Chair of Governors)

NSPCC Whistleblowing Advice Line: 0800 028 0285

4.1 Governing body

The governing body will ensure that the school meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- The school has the following policies in place and that these are regularly monitored, reviewed and updated where necessary; safeguarding policies and procedures covering early help and child protection that are consistent with Ealing Safeguarding Children Board procedures and Ealing's internal policies. A staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media.

- The school is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.

- There is a nominated governor with responsibility for liaising with Ealing Safeguarding Children Board on safeguarding and child protection matters and who links with the LADO in the event of an allegation against the head teacher.

- A senior member of staff is appointed the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.

- There is a designated teacher nominated to promote the educational achievement of looked after children and that this person has received appropriate training for the role.

- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection polices and the staff code of conduct policy.

- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school and there are robust whistleblowing procedures in place.

- Steps are taken to ensure parents and pupils are aware of the school's safeguarding and child protection policies and procedures.

- Governors take steps to ensure children are given opportunities within the

curriculum to learn how to keep themselves safe, including on-line safety.

- The school has appropriate written procedures in place to ensure safe recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis

- At least 1 member of the governing body has undertaken accredited safer recruitment training.

- All staff receive safeguarding and child protection training at least every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation.

- The school has procedures in place to deal with allegations made against other pupils and pupils who go missing from education.

- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

4.2 Headteacher

The head teacher will ensure that the school meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the school's safeguarding and child protection policies so that they are fully aware of their role in safeguarding children and are able to fully implement policies.

- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services.

- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals to Social Services.

- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.

- Safe recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.

- The school offers a safe environment for staff and pupils to learn.

- Safeguarding issues are brought to the attention of the governing body.

4.3 Role of the designated safeguarding lead (Headteacher)

The role of the designated safeguarding lead and their deputy is to take lead responsibility for safeguarding and child protection within the school and to be available during school hours for staff to discuss safeguarding concerns. If neither the Designated Safeguarding Lead or Deputy are on school site staff may contact them at any time on their mobile phone (number given to all staff)

The role of the designated safeguarding lead is to:

- liaise with and manage referrals to relevant agencies such as SAFE, ECIRS and Social Services, the LADO, the Police and the Disclosure and Barring Service (DBS)

- keep the board of governors informed of on- going safeguarding and child protection issues and enquiries

- provide advice and guidance for staff on safeguarding and child protection issues and making referrals

- ensure the school's safeguarding and child protection policies are up to date and consistent with Ealing Safeguarding Children Board policies and that policies are reviewed annually

- ensure all staff, including temporary staff, are aware of and understand the policies and procedures and are able to implement them

- attend regular refresher training every 2 years and the designated teachers meetings hosted by Ealing Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local safeguarding and child protection procedures and working practices

- provide regular updates received from Ealing Safeguarding Children Board to all staff members and governors on any changes in safeguarding or child protection legislation (updated information will be provided by Ealing Safeguarding Children Board at the designated teachers meeting and designated safeguarding leads will be responsible for communicating this information to staff immediately; they may decide to hold workshops or discuss in staff meetings)

- have an awareness of those children who may be in need, young carers and children who have special educational needs

- oversee child protection systems within the school, including the management of records, standards of recording concerns and referral processes

- provide a link between the school and other agencies, particularly Ealing Safeguarding Children Board

- ensure staff , including temporary staff, receive appropriate safeguarding and child protection training every year

- ensure parents are fully aware of the school policies and procedures and that they are kept informed and involved

- ensure relevant records are passed on appropriately when children transfer to other schools.

- ensure there are at least two emergency numbers held on record for every child on roll.

5. Confidentiality

West Twyford Primary School securely handle all confidential data in line with GDPR guidelines. Below covers the processes and principles for sharing safeguarding information within the school and external agencies as required.

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information (see appendix 1)
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy

6. Early Help Indicators

West Twyford Primary School maintains an approach 'of it can happen here' and considers all safeguarding for all children. This is a key component of annual safeguarding training and ongoing safeguarding practice.

We are particularly alert to children with the following early help indicators (Working Together to Safeguard Children 2023)

Early help indicators. A child who

- is disabled and/ or has special educational needs (whether or not they have a statutory education, health and care (EHC) plan) •
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime • is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised53
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse54
- is misusing drugs or alcohol themselves
- is suffering from mental ill health
- has returned home to their family from care
- is a privately fostered child55
- has a parent or carer in custody56
- is missing education57, or persistently absent from school, or not in receipt of full time education
- has experienced multiple suspensions and is at risk of, or has been permanently

LGBTQ+ Children

Being lesbian, gay or bisexual is not in itself a risk factor. However, West Twyford is aware that children in this group can be more vulnerable and that being perceived to part of this group can also confer vulnerability. West Twyford supports LGBTQ+ children and incidents of homophobic behaviour are dealt with quickly and effectively and a separate record is kept. School is also proactive in promoting understanding and reducing these issues.

Gender Questioning Children

West Twyford will not initiate action in this regard. Any adjustments are made with school agreement (SLT) and parents/ carers. In the vast majority of cases parents/ carers will be informed and school work with them to support the child. School will not allow children into spaces designated for the opposite gender.

7. Categories of Child Abuse, Neglect and Exploitation

There are many aspects to child abuse and safeguarding concerns and they are not always easy to identify. **It is important to be aware that children might not be ready to, or know how to tell someone about abuse or issues they are experiencing, or might not recognize their experiences as harmful.**

Staff need to be professionally curious and share any concerns.

Following is a list of the main areas:

Neglect
The persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold, or starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development including psychological failure to thrive.

Physical Abuse
Actual or likely physical injury to a child or failure to prevent physical injury, or suffering to a child including deliberate poisoning, suffocation and Munchausen's syndrome by proxy. Children living in families where there is known or suspected domestic or family abuse. Children who see, hear or experience the effects of domestic abuse are also victims.

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Sexual Abuse
Actual or likely sexual abuse of a child or adolescent. The child may or may not be dependent and/or developmentally immature. Sexual violence and sexual harassment can occur between children too. This is referred to as child-on-child abuse. Harmful sexual, can occur between children on any age and escalate to sexual abuse.

Misogyny
Discriminatory behaviour amd misogynistic views are not tolerated in school and school acts promptly on any concerns and is proactive in addressing this.

Emotional abuse
Actual or likely severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill treatment or rejection. All abuse involves some emotional ill treatment. This category should be used where it is the main or sole form of abuse.

Child Sexual Exploitation
Sexual exploitation involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation

can occur through the use of technology without the child's immediate recognition: for example being persuaded to post sexual images on the Internet/ mobile phones with or without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Research carried out has concluded that Sexual exploitation tends to be a hidden activity, more likely to occur in private residences than on the streets.

Sexual exploitation tends to fall into three main categories:

1. Inappropriate relationships
2. Boyfriend/Peer exploitation
3. Organised/networked sexual exploitation or trafficking

Organised sexual exploitation/trafficking is the most complex form of exploitation and therefore considered a very high risk but the other forms can expose a person to extreme levels of intimidation and/or physical and/or sexual violence.

Perpetrators do not always engage in sexual activity themselves but may be arranging for others to do so. Under the Sexual Offences Act 2003 this is defined as trafficking within the UK and is increasing.

Tell-tale signs include:

- Going missing for periods of time
- Returning home late
- Disengagement from education
- Appearing with new possessions/unexplained gifts e.g. jewellery, phones, money with no plausible explanation
- Association with peers also involved
- Sexual health issues e.g., inappropriate sexual behaviour
- Changes in mood/temperament
- Drug/alcohol misuse
- Over familiarity with strangers
- Sending sexualised images over internet or mobile phones
- Involvement in exploitative relationships or association with 'risky' adults

ANY child or young person can be exploited regardless of gender, age or background. Research, however, shows that certain factors

can increase vulnerability. These include domestic violence, disrupted family life, poor mental health for child/ in family, parenting issues, drug/alcohol misuse.

Vulnerability can also increase for children in care, those excluded from school and those with drug/alcohol issues.

Child Criminal Exploitation

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

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too.

It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

County Lines

County Lines describes the export of illegal drugs by gangs or organized criminal networks. Children can be drawn into this and may be coerced through violence and intimidation to comply. This targeting can be done vis social media. Key indicators of children involved in this include children missing school and being found in places away from the home.

Children Absent from Education

We recognize that absence from school, particularly repeated or for prolonged periods, can be an indication of a safeguarding concern. Our attendance procedures support early identification

Children with family members in prison

Children in this category are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Online Safeguarding risks including Cyber Crime

Internet communication and social media present safeguarding risks to children. This can accessing inappropriate content, inappropriate communication with others including both children and adults, online bullying and coercion. Computers can support criminal activity which occurs off-line or can be the media through which crimes are committed. See below for dealing with internet and computer related concerns.

Mobile Phones

Only children in year 5 and 6 are allowed to bring mobile phones to school. These are not allowed to be used on the school premises and are collected at the beginning of everyday, stored in school and returned at home time. Any mobile phone found on a child's person is confiscated and parents/ carers collect this from the office. In the case of repeated failure to follow procedures, the right to bring a phone to school may be withdrawn.

Sexting
Sexting is when a young person takes a nude or semi-nude image of their self and sends this to their friends or boy/girlfriends via mobile phones. There are a number of definitions of sexting but for the purposes of this advice sexting is simply defined as images or videos generated:

- by children under the age of 18, or
- of children under the age of 18
- of a sexual nature or are indecent.

These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know. Once taken and sent, the sender has lost control of these images and these images could end up anywhere e.g. future employers, their friends or by child sex offenders. By having in their possession, or distributing, indecent images of a person under 18 on to someone else – perpetrators could be breaking the law as these are offences under the Sexual Offences Act 2003. (CEOP, 2015)

Children in Year 5 and 6 will be informed about the implications of sexting and how, once a picture has been sent, this image can never fully be removed from the World Wide Web.

Mental Health
Abuse, neglect or other traumatic adverse experiences can have a lasting impact on mental health, in childhood, adolescence and into adulthood. Staff need to be alert to the impact of these experiences on children and the signs

that children are struggling with mental health.

Modern Slavery
This encompasses human trafficking, servitude and forced labour. This exploitation may take many forms including forced labour, sexual exploitation, forced criminality

Radicalisation
Children are susceptible to radicalisation and this can take place in the home, community, or online.

Extremism is the vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and the mutual respect of tolerance and individual faiths.

Radicalisation id the process of legitimising support for or the use of terrorist violence

Terrorism is endangering or causing serious violence to a person or people, property or interfering with or disrupting and electronic system.

Staff need to be alert to change sin children's behaviour and record any concerns that might be referred to Prevent

The Prevent duty

All staff are subject to this duty under section 26 of the counter-terrorism act 2015. Schools have a legal duty to prevent young people from becoming terrorists or supporting terrorism. To meet this duty the school will:

- Assess the risk of students becoming terrorists or supporting terrorism
- Work in partnership with the local authority
- Train staff to identify at-risk children
- Keep students safe online
- Ensure the formal and wider curriculum promotes the school's vision and British values.

Sexual violence and harassment between children

This can occur at any age and online. It can be between two children or involve groups of children and involve physical and verbal aspects. This experience will very likely have a negative affect on children.

Serious Violence

Key indicators a child involve din or at risk of serious violence include: absence from school, changes in friendships, issue sin school performance,

self harm, unexplained injuries or changes in well-being, unexplained gifts or new possessions. Boys are more likely to be involved in serious violence.

Honour based abuse

This encompasses incidents or crimes committed to defend the honour of the family This can involve FGM (see below), breast ironing, and forced marriage. Any indication so these are treated as safeguarding concerns and appropriate actions taken.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Female Genital Mutilation

FGM is a form of child abuse and violence against women and girls, and is therefore part of child protection. It is often referred to as 'cutting'. Professionals have a responsibility to ensure that families know that FGM is illegal, and should ensure that families know that the authorities are actively tackling the issue. This knowledge alone may deter families from having FGM performed on their children, and save girls and women from harm. UK legislation - FGM is illegal in the UK. While parents are not always keen to perpetuate FGM, their parents may apply pressure to do so.

In England the practice is illegal under the Female Genital Mutilation Act 2003. It is also an offence to assist a girl or woman to mutilate her own genitalia. It is an offence for anyone to perform FGM in the UK or to assist a girl to perform FGM on herself in the UK. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant.

There are four types of FGM

1. Clitoridectomy – partial or total removal of the clitoris
2. Excision – partial or total removal of the clitoris and the labia minora, with or without the excision of the labia majora
3. Infibulation – narrowing of the vaginal opening
4. All other harmful non-medical procedures to female genitalia.

The practice is normally carried out on girls between the ages of 4 and 13, although the majority of cases are thought to take place between the ages of 5 and 8. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young

person. Victims of FGM are likely to come from a community that is known to practice FGM. They may talk of going to their family's country for an extended stay, they may refer to s special ceremony, or to becoming a woman. They may return in discomfort or have to be hospitalised.

Staff should also note that the girls and women at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. If in any doubt, staff should speak with a DSL. It is our statutory responsibility to report any case of actual or suspected FGM to the authorities.

If a child has been deemed to have suffered in any of these areas, a Child Protection Conference may be called and the child may be placed on the **Child Protection Register.** This register is known to all agencies involved in the child's welfare. Placement on the register is regularly reviewed and the child's welfare is closely monitored.

Allegations of abuse made against other pupils

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".
We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.
Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom

the allegation has been made and any others affected) with a named person they can talk to if needed

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

It is important that when staff have any concerns about child-on-child abuse they report this to the DSL

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by discussing it in class, as part of their PSHE lessons.
- Ensuring staff are trained to understand that a child harming another child could be a sign that the child is being abused themselves.

6. Online Safety

The use of computers and the internet provides opportunities for crimes and safeguarding concerns. This ranges from radicalization and prevent concerns, to bullying, sexting and coercion. School has procedures in place to control this risk in school and it is much more likely that online issues will occur out of school. However, the effects and the signs of distress, upset and poor mental health are likely to be shown in school and staff must be alert to key indicators of distress. Online issues present some challenges to school in investigating this and therefore referral to other agencies such the Police will be considered by DSLs. Online bullying and inappropriate communication by pupils is covered under the behaviour and anti-bullying polices.

Children can also access inappropriate content online in the following categories:

- Misinformation
- Disinformation (know as fake news)
- Conspiracy theories.

All safeguarding concerns, including online concerns must be reported as per the school policies and procedures.

Filtering and Monitoring

In order to keep children safe at West Twyford we have steps in place to protect children from harmful and inappropriate content. We use the LGfL filtering system to block this content from appearing in school. This is managed by our IT provider (Turn It On) and is reviewed annually.

In addition, we monitor any safeguarding concerns. All staff using IT with children are responsible for monitoring and alerting DSLs to any inappropriate or harmful content. DSLs record any incidents and the safeguarding lead (Currently head teacher) reviews these with the IT provider.

Artificial Intelligence (AI)

Generative AI si a rapidly developing technology and presents new challenges and potential safeguarding concerns to school. DSLs receive regular training updates and these inform updates to polices and practice. Staff receive ongoing training and support.

The Deputy Headteacher is the AI lead. AI is not currently used by pupils in school but staff are alert to safeguarding issues as a result of its use outside school.

7. Responding to the Child:

When a pupil first reveals abuse the staff member should:

1) listen carefully to what the child says;
2) reassure the child that they are not to blame and were right to tell;
3) acknowledge the child's feelings;
4) ask questions to help them give more details if they wish but, do not lead: e.g. "Would anyone else understand how you feel?" rather than "Does he do this to your sister?";
5) the child may love the abuser, but hate the abuse, so agree the abuser "is wrong" and not "bad";
6) reassure the child that adults will ensure that they are protected;
7) let the child know that you have to tell someone else so she or he will not be hurt anymore;
8) Inform the DSL in person
9) make a written record on CPOMS as soon as possible after talking to the child, with full details, , actions taken, and annotate the diagram to show the location and size of marks on the child's body stating the date when it was seen;
10) once the procedures set out in paragraph 5 below are followed, then the child's feelings must be acknowledged and they should be told:
    - who else knows about the allegation;
    - their confidentiality will be respected, but that others may need to be told in order to secure help;
    - they can talk to a staff member whenever they need to; and
    - it is right that abuse is made known.
11) Returning to school after a traumatic investigation will be easier for the pupil if an appropriate/known member of staff e.g. Head/Deputy/Asst Head contacts the child/family, acknowledging the outcomes and

rebuilding relationships.

8. Vulnerable groups: children with special education needs or disabilities (SEND) and lesbian, gay, bisexual, transgender, questioning + (LGBTQ+)

The school is aware that children with special education needs or disabilities may be more vulnerable to harm and abuse and may be more likely to experience bullying. Pupils who are LGBTQ+, or perceived to be, may also be at greater risk of harm. School policies reflect this and recognise that staff need to be able to help these group to overcome barriers to seeking help.

9. EYFS

The processes and procedures set out in this document include our Early Years Foundation Stage. We meet the safeguarding and welfare requirements set out in the Statutory Framework for EYFS (31 March 2021) e.g. staffing qualifications, training, adult: pupil ratios, health, managing behaviour, record keeping, safe environment and SEND.

10. Reporting Procedures:

Teachers and support staff should be aware of all the children in their class on the Child Protection register and those about whom there are general concerns. The CPOMS system collates all documentation relating to concerns about a child and it is the teacher's responsibility to ask the DSL for information about the child. They will be informed about anything they need to know. The teacher, and class support staff, are uniquely placed to observe the behaviour of large numbers of children and are likely to know what is 'normal' or 'usual' for a particular child and can spot concerns over e.g.:

- Marks on the child's body
- Unusual / different behaviour, including academic achievement
- Mood changes
- Puzzling statements / stories from the child or information from others

Staff must record the following:

- Patterns of attendance
- change in moods
- Changes in classroom functioning
- Relationships with peers / adults
- Behaviour
- Statements, comments, stories, 'news', drawings
- General demeanor and appearance
- Parental interest and comments
- Home / family changes
- Medical
- Response to PE / sport sessions

- Injuries / marks past and present

If any adult suspects, or has evidence of, or a disclosure of abuse, then **within the same day, whilst the child is still at school**, the following steps should be taken:

IN ALL INSTANCES OF ABUSE:

(a) The staff member with the concern tells **the DSL (in the first instance this is the Headteacher) The concern must be recorded on CPOMS . If the Headteacher is not available the staff member should report to either of the deputy DSLs, or the person in charge that day. If this is impossible, they should phone the Child Protection Advisors at the relevant local authority, record their advice and action it. However, it should always be possible to contact one of the DSLs or the leader on duty.**

(b) The injury or concern and the child's explanation (or lack of it) should be recorded on CPOMs. Facts should be separated from opinions. For Child Protection reporting, any action (such as contacting social services) must be dated and include the time.

IN RESPECT OF NON-PHYSICAL OR NON-SEXUAL ABUSE ONLY:

(a) The DSL, in collaboration with the Head /Asst Head /other may decide that a telephone call to the parent is sufficient if there have been **no previous concerns**. This call is to verify the child's story and to inform the parent. This shared decision means a shared responsibility. **- WITHIN HALF A DAY.**

(b) If the explanation is unsatisfactory then the DSL must consult with previous CPOMS entries, all who may have knowledge of the child's welfare, e.g. previous teacher, support staff, to build a fuller picture and to decide on what course of action should be taken. **- WITHIN HALF A DAY.**

(c) If there is uncertainty about whether or not to refer, then one of the following can be consulted:
- ECIRS helpline (020 8825 5236) or Brent Family Front Door (020 8937 4300 select Option 1)
- The Social Services office for the child's home address
- The Education Department's designated officer for child protection

SUSPECTED PHYSICAL OR SEXUAL ABUSE:

(a) If a child makes an allegation of physical or sexual abuse Social Services **MUST** be contacted and the child kept in school before the parents are informed. For low level physical abuse, consent would be sought form parents regarding the referral is being made, unless an implement was used or there are marks on the child. In these cases you would follow the advice of the social workers as to whether to contact the parent.

(b) Referrals should be made by phone to the Social Services office for the child's home address. CPOMs entries, the facts of the case, past concerns and any other relevant information should be given. Ask to be kept informed of developments.

(c) Confirm the referral, and the details of it, in writing to Social Services through a referral form.

(e) When the DSL speaks to Social Services, they should decide which of them will phone the parents about the referral and when this will happen. These decisions will depend on the circumstances of individual cases.

(f) **In cases of severe physical or sexual abuse the concerns must not be discussed with parents.** Social Services will do this only after an inter-agency strategy meeting. Advance warning may allow an abuser to bribe or intimidate a child. The same may apply in cases of physical abuse. **Advising parents of the referral should happen after discussion with Social Services.**

All information and decisions should be recorded, dated and signed. All information is confidential and must be stored electronically on the CPOMs system.

Anyone who has a concern that a child might have been abused by another child should refer their concerns to children's social care in accordance with the referrals procedure. Allegations of peer abuse will be taken as seriously as allegations of abuse perpetrated by an adult.

11. Parental consent to refer

Where there is no immediate safeguarding concern about a child, but additional services and help are needed to support a child in need – consent of the parent must be sought by the DSL. **However, if the child has been harmed or is at risk of harm or abuse – it is not necessary to gain consent to refer the case to Children's Services.**

Other instances in which you may consider making a referral without the parent's consent:

- If seeking consent put the child at increased risk.
- If seeking consent would cause delay which significantly adds to the risk.
- If the concern is about sexual abuse, forced marriage, honour-based violence, female genital mutilation, fabrication or induced illness in a child.

- If the child or young person has the capacity to understand and make their own decisions to give or refuse consent to sharing information about themselves. It is presumed that young people over the age of 16 have sufficient understanding. Children aged 12 and over may generally be expected to have sufficient understanding.

Where consent has not been given or where you think it may not be appropriate to seek it – call the ECIRS Consultation Line on 020 8825 5236 or call ECIRS on 020 8825 8000 or Ealing's Child Protection Advisers (CPAs) on 020 8825 8930.

12. Responding to Parents

It is necessary to strike a balance between respecting the parents and ensuring children are protected. Childcare legislation stresses that the child's welfare is paramount so parents may have to be distressed in order to protect children who may be abused. Staff need to keep in mind:

1) the importance of not assuming or expressing 'guilt' to parents;
2) that they should not believe or assume that parents are not the sort of person who would abuse;
3) the importance of gathering all related information;
4) the investigation is not a criminal inquiry but an attempt to find out what has happened;
5) Social Services must be contacted before parents are told of the concern by the school in cases where the child has been harmed or is at risk of harm or abuse.
6) the need to tell parents that Government guidelines direct schools to refer concerns to Social Services. The school has no discretion in the matter.

13. Working with parents and carers

The school recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

The school will:

- make parents aware of the school's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by making school policies available on the school website or on request

- provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff

- consult with and involve parents and carers in the development of school policies to ensure their views are taken into account

- ensure a robust complaints system is in place to deal with issues raised by parents and carers

- provide advice and signpost parents and carers to other services and resources where pupils need extra support.

14. Recording and Monitoring Concerns

Recording has special importance in child protection work and will be invaluable in helping agencies to assess a case. It ensures accurate transfer of information between classes and schools. It may also be needed if court action is necessary. It will also serve as a record that staff have acted appropriately and followed guidelines. All staff have a responsibility to record child protection concerns. The school **is not** required to disclose any child protection information to parents. The following must be recorded:

1) any concerns as they arise, no matter how small;
2) marks on the pupil's body, using a body map and incident book;
3) inappropriate behaviour;
4) poor attendance reported to team leaders/welfare officer ;
5) details of conversations with parent and pupils about the concern;
6) each contact with or referral to another agency;

This should be entered onto the CPOMs system which ensures that material is collated effectively, kept securely and can be accessed by DSLs as required.

15. Role of the DSL:

Duties of the DSL include:

1) to undertake training in the recognition and investigation of child abuse;
2) to develop the knowledge of the procedures involved in reporting child abuse;
3) to make this knowledge available to school staff in individual consultation and in school-based training;
4) to liaise with appropriate school staff on ensuring the use of relevant curriculum material;
5) to manage the process of referring cases of abuse to social service;
6) to ensure the school is represented at relevant case conferences;
7) be a contact point for agencies needing to contact the school about child protection issues.
8) to manage the Child Protection Register requirements;
9) to identify the need for support that any staff may have when involved in a serious abuse case. Having liaison with the Education Department's designated officer on how support can be offered.
10) to ensure all staff have a copy of the DfE's 'Keeping Children Safe in Education' summary.

For more detailed information read page 8 of Ealing's Child Protection Procedures.

If the DSL is unavailable the matter must be dealt with immediately by the Head Teacher or Assistant Head Teacher, who are fully trained as DSLs. It is not acceptable to leave a report about a serious issue awaiting the lead DSLs return to school the next day – it must be dealt with immediately by the Headteacher or Assistant Head Teacher or the teacher in charge for the day.

16. Role of the Head of Access and Pupil Welfare

The Local Authority Designated Officer is Emmanuel Adofo, asv@ealing.gov.uk, 020 8825 8930, and he is available to support the school in all issues relating to Child Protection. He will work with the DSL and others to decide on appropriateness of referrals and whether a referral to Social Services should take place. He is also available for guidance and support to staff members.

17. Support for Staff

The abuse of children can generate strong emotions in professionals, especially if they know the child well. Such feelings are natural and can affect staff personally. Staff may also have the burden of continuing daily contact with the child, and in some cases the parents. Support in the form of opportunity for staff to discuss their feelings and the effect of this work on their personal life can come from:

1) Colleagues, DSL, Headteacher or;
2) the Education Department designated officer is available for discussion or organisation of appropriate support.
3) Staff can also access the Employee Assistance Programme on 0800 243458

18. Vulnerable pupils

Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator).

See also section 6. Early Help Indicators

19. Looked After Children (LAC)

The DSL will maintain regular communication with the allocated social worker for any Looked After Children (LAC) or those children subject to Child Protection Plans and will ensuree that the social worker will be informed of any issue that gives cause for concern. LAC are a vulnerable group and may suffer from:

- Low self-esteem
- Poor education standards due to time out of school
- Delayed social/emotional/cognitive development
- Bullying (or they may bully others)

- Mental health issues
- Isolation with few friends
- Behaviour issues

20. Children attending Alternative Provision

In the case of a child attending an alternative provision for a temporary period or for a part of the week, West Twyford will ensue that thew reis appropriate and effective safeguarding in place. School will receive written information regarding this and must be satisfied that this is secure before the child attends. West Twyford will ensure that they know where the child is everyday and will review the placement half termly.

21. Children who are missing from education or home educated

Children who are persistently absent or missing from school are identified and reported to the DSL and local authority as this may be an indicator of welfare concerns.

Our attendance policy states clearly who needs to be notified and what action should be taken and any relevant timescales. Schools should refer to Ealing's "Children missing from education" guidance and the CSCB missing children protocol for further details.

Where a parent notifies the school that they are removing the child so they can be educated at home, the following notifications should be made:

- The Education Social Worker (ESW) must be notified of all decisions
- If the child is already known to ESW, their allocated social worker should be notified immediately
- If the child is not known to ESW, but the school has concerns about their welfare, the designated safeguarding lead should make a referral to ESW.

22. Training Needs

All staff need to be familiar with the guidelines and know how to respond to child abuse concerns. **The following documents will be given to all staff, volunteers and supply staff:**

- Summary of Keeping Children Safe in Education, September 2024
- Child Protection Policy
- Staff Code of Conduct including Acceptable Use Policy
- The name of the DSLs (The Head Teacher, Deputy Head Teacher and Assistant Head Teacher) and Safeguarding Governor
- Whistleblowing Policy

The guidelines will be discussed:

1) in team, staff and management meetings;
2) formal training as part of an annual whole school INSET;
3) Staff briefings and newsletters
4) CP courses provided by the borough.

23. Preventative Child Protection Curriculum

We develop within our pupils an awareness of safety, maintain self-discipline and self-esteem. Our PSHE curriculum includes components differentiated by age so they progressively learn the knowledge and skills needed to keep them safe. These include the topics:

- my self and family;
- keeping safe, personal safety, safety in the home and road safety;
- health and sex education;
- education for citizenship.
- online safety
- mental health and wellbeing

Our Computing curriculum covers online safety and additionally teachers focus each half term on an app/online game that is currently popular with children to educate pupils, parents and staff about the risks.

We have a trained Mental Health Lead and a trained Emotional Literacy Support Assistant(ELSA) and the SPACE (counselling and therapy service) offering individual and group support to vulnerable and potentially vulnerable children.

We aim to integrate child protection within the existing curriculum and provide a safe learning environment in which children can explore emotive issues – there must be clear ground rules. Furthermore we aim to acknowledge children's and young people's rights to:

- Express and share feelings, emotional ideas and opinions
- Be assertive and make judgments and choices
- Be shown respect for their own bodies and ideas
- Understand love and care
- Safety at home, at school and in the community
- Encouragement
- Tolerance – permission to experiment, make mistakes and learn their own way
- Be valued and accepted
- Respect as individuals without prejudice

We recognise the contribution of the informal curriculum and ethos of the school, especially through adult examples of tolerance, sensitivity and negotiation. These and related issues are integrated into the wider curriculum and topics appropriate to different key stages. We deliver assemblies to support safeguarding and to empower pupils to keep themselves safe. In addition the schools seeks advice and guidance from the local authority health in schools team.

24. Safer Recruitment and DBS

The Head teacher, and a governor have been trained in Safer Recruitment techniques and at least one of the above will conduct all interviews. West Twyford adopt recruitment procedures that help deter, reject or identify people who might abuse children; all adverts clearly state that children are safeguarded and all successful applicants are required to be DBS checked. All newly appointed staff are required to bring in qualifications, appropriate ID and evidence for DBS checks to take place and before taking up a placement at the school. The school has a Single Record Database in compliance with DfE guidance.

The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016 specifically state that *by 1 September 2016, all maintained school governing bodies to apply for an enhanced criminal records certificate for any serving governor who does not have one.* **In accordance with the updated Keeping Children Safe in Education 2018 guidance,** all Governors will be subject to a Section 128 check, which will be recorded on the Single Central Record.

25. Volunteers, Parent Helpers

All volunteers are required to have a clear DBS check prior to working in school if their duties include prolonged or regular contact with children in isolation. If a volunteer is not checked, a risk assessment will be undertaken and the volunteer must be supervised at all times. Class teachers must make volunteer helpers in their classroom aware of the need for **complete confidentiality of information** in school and the necessity to pass on any concerns / conversations with regards to child protection issues which come to their notice. They must be given a copy of the Child Protection Policy, Acceptable Use and E-Safety Policy, Whistleblowing Policy and the summary of Keeping Children Safe in Education as part of their Induction Meeting with the School Business Manager.

A summary of DBS requirements for volunteers, regular visitors (e.g. Primary Behaviour Service) and contractors

Category	Supervision	Enhanced DBS
Short – term or infrequent volunteer	Supervised	No (Risk Assessment in place)
Volunteer, Placement, regular	Unsupervised	Yes
Regular Visitor (External Agencies)	Unsupervised	Yes
Contractor – less than 4 days/month	Supervised	Yes – without barred list info
Contractor – more than 4 days/month	Unsupervised	Yes
Afterschool Provider	Unsupervised	Yes

26. Allegations against staff

Safeguarding concerns about adults in the school should be made directly to the headteacher, Matthew Shapland.
The Head Teacher will refer these to the LADO Officer, currently Emmanuel Odofo, asv@ealing.gov.uk , 0208 825 8930.
In the event of an allegation against the Head Teacher, these are reported to the Chair of Governors, Steve Coleman/ Nimisha Carver who will contact the LADO.

See Appendix A

27. Ofsted Training Requirements:

- The DSL is trained and does a refresher at least every two years.
- The whole school staff have safeguarding training every year.
- The Governing Body have received safeguarding training and one Governor is nominated to have safeguarding as a specific responsibility.

28. Policy Links

- Antibullying Policy
- E-Safety Policy
- Keeping children safe in education
- Model procedure for schools responding to allegations of abuse by teachers and other school staff
- Single Equality Policy
- Whistleblowing Policy
- Acceptable Use Policy

29. Children Missing Education / Off Roll

Summary of Procedures for School and Educational Social Work Service – Education and Welfare Issues

<u>If a parent advises school that the pupil is moving to another school or a different area then:</u>

1. Ask parent to complete Ealing's Leavers Form which includes the child's name, new address, new school (if known), another contact person and date of leaving.
2. The child remains on the school roll until we have received verbal confirmation from the child's new school that they have started attending.
3. Pupil records are transferred to the new school electronically via a CTF and paper copies are sent via the post in a recorded delivery (see appendix 2).
4. If the new school cannot confirm the pupil transfer, the school will contact the parents and emergency contacts to gather more information. The child remains on the school roll. The school will complete a 'reasonable enquiry form' (appendix 3) and contact Ealing CME team as a referral.

If a pupil ‘disappears’ from roll and there is no preceding notice from the parent then:

1. School complete the ‘reasonable enquiry’ (see following pages) form after 3 days of no contact with the parents and refer to the ESW service.
2. The child remains on the school roll until advised by Ealing about the child’s whereabouts.

Appendix A

Section 1: allegations that may meet the harm threshold

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children

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

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 local authority 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 that supports the allegation being made

Procedure for dealing with allegations

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

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

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority 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 local authority 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.

Additionally union support suggested and the staff member reminded of Workplace Options contact details (0800 242 458)

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 local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations

relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers, trainee 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, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.

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

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

In these cases, the school will provide a copy to the individual, in agreement with local authority 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 that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- 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
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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. Staff must share any low-level concerns with a DSL (HT, DHT, AHT, SENDCO).Where low-level concerns are reported to a nominated person other than the headteacher, that person will ensure the concern is shared with the headteacher in a timely manner according to the nature of each particular low-level concern.

We will create this culture by:

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

Responding to low-level concerns

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

- Directly to the person who raised the concern, unless it has been raised anonymously

8. To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns. However, depending on the nature of the low-level concern and/or the role of the designated safeguarding lead (DSL), the headteacher may wish to consult with the designated safeguarding lead (DSL) and take a more collaborative decision-making approach.

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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 Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

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

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

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

Schools reasonable enquiry form September 2020

www.ealing.gov.uk

Leading to **Children Missing Education /Off Roll**

When should this form be submitted:

- Where pupils have stopped attending or engaging with the access to education at home resources and attempts to make contact have not been successful and no leaver's form has been completed.
- If a leaver's form has been submitted with no destination school.

*Please remember that it is the school's responsibility to ensure all information is provided by parents/carers of children leaving their school. Where parents/carers state that they have made an application for a school place for their child/ren, but have not yet been allocated one, the school must contact the Admissions department of the family's new Local Authority for confirmation this has been received. This must be done **before** taking the child off roll.*

When should this form not be used:

- Pupils who have stopped attending but have not moved; these are non-attenders NOT CME i.e. where the Local Authority Link Attendance Officer has confirmed the parent is still liable for council tax at the home address and it is believed the child is still living there.
- If parents are still in contact with the school and claim the child will return and there is **justifiable** reason for delay. In such circumstances, schools should request evidence and discuss with the CME officer if you are unsure. These pupils must remain on the school's roll for up to 20 days continuous absence or until permission to off roll has been given by the CME officer. Every effort will be made to resolve cases as quickly as possible, **please be reminded that when off rolling, attendance cannot be backdated.**

If at any time, there are Safeguarding Concerns for the child, a referral should be made to ECIRS@ealing.gov.uk

Please also refer to Private Fostering Responsibilities at: https://www.ealingfamiliesdirectory.org.uk/kb5/ealing/directory/advice.page?id=uDwWv33gjtU

Please follow the procedure below before submitting a Reasonable Enquiry form:

1) Begin enquiries on the third day of absence where there has been no contact from parents or carers (if you have no knowledge of the child's whereabouts). Enquiries can be telephone calls, text messages and emails. It is advisable to try all forms of communication available. Three attempts at contact, on separate days, is required before submitting an enquiry to CME.
2) **Home visits *must* be carried out by the tenth day. (High Schools will have their own Attendance Officers or Safer Schools Officer) Primary Schools can contact their Local Authority Link Attendance Officer to assist with home visits within ten days of the first day absence.**
3) Submit the Reasonable Enquiry form and the child's registration certificate to CME@ealing.gov.uk by secure email/Egress on the tenth day of absence if the child still has not returned to school and you cannot contact their parent/carer to establish where they are and why they are not attending.
4) **Please be aware that Reasonable Enquiry forms will be returned with instructions for the school to complete their enquiries if the correct procedure has not been followed.**

When is it appropriate to take a pupil off the school roll?

- 20 days continuous absence, where there has been no communication between parent and school/Local Authority. After both the school and Local Authority have tried to locate the pupil and Reasonable Enquiry has been undertaken, and this form has been returned to the Local Authority CME team who have agreed off rolling after council tax and social care checks, and/or confirmed referral made to CME in their new Local A

TWELVE TIPS ON TALKING TO CHILDREN WHO HAVE BEEN SEXUALLY ABUSED.

1. Believe them and tell them that you believe them. The abuser will have told them that no-one will believe them.

2. If you feel shock and disbelief don't let the child think that means that you can't hear what they are telling you.

3. Say "you were right to tell me". The abuser will have frightened them into keeping silent.

4. Tell the child that the abuse was not her/his fault. The abuser will have made them feel responsible.

5. The child may love the abuser but hate the abuse. Tell the child that the abuser was "wrong" rather than "bad".

6. Tell the child you will try to help them stop the abuse.

7. Don't agree to keep the sexual abuse a secret. Don't promise things you can't do. Do reassure the child that you will do all that you can.

8. Tell them whom you will be telling and why.

9. Don't say things like "are you sure?", "why didn't you tell me before?", "I don't believe it".

10. If the child tells you and you are surprised, don't rush away to inform other people. Control your panic and spend time with the child until you have reassured her/him and informed the child of your actions. You will need support, but at this stage this is not as important as the support that the child needs.

11. Make sure that the child knows that your anger is with the abuser and not with them.

12. Don't necessarily believe the child if she/he later retracts the allegation. This is because of the hurt, confusion and panic that they are now feeling.

The seven golden rules to sharing information

Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

1. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

2. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

3. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

4. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

5. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely (see principles).

6. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Procedure for the transferring of safeguarding documents to a new school

Procedure for the transferring of safeguarding documents to a new school

Once a pupil has been confirmed as attending a new school the procedures for transferring the safeguarding documents are as follows:

Scenario 1 (if new school has no CPOMs)

If a pupil is leaving the school the Designated Safeguarding Lead will hand the file to JL once it has been checked. A checklist should be completed with details of the new school and start dates and signed off by the DSL. A transfer of records letter addressed to the DSL at the new school is attached to the file, along with a private and confidential stamped addressed envelope. JL will send the file to the school by recorded delivery. The checklist along with the proof of postage should then be stored in the archive file in the secure filing cabinet.

Scenario 2

If a family is leaving West Twyford Primary School and the pupils are going to different schools, the procedure for Scenario 1 should be followed, but records sent separately to relevant schools.

Scenario 3

If the new school has CPOMs, the Designated Safeguarding Lead will electronically transfer the records as soon as the child starts there. A checklist should be completed as per scenario 1 as filed in the archive.

For the transferring of all safeguarding records the checklist should be completed and signed off by the Designated Safeguarding Lead before any records are posted to the new school or transferred via CPOMs. The checklist should be filed in the archive.