



# THE BEDIFFERENT FEDERATION



# SAFEGUARDING CHILDREN POLICY AND PROCEDURES

**Mrs N Bull**  
**Chief Executive Headteacher**  
**September 2024**

## **What to do if you are worried about a child**

The BeDifferent Federation has a statutory duty to 'safeguard and promote the welfare of children.' All staff members should be aware of the systems within The BeDifferent Federation which support safeguarding.

If you have any concerns about the health and safety of a child at this school or feel that something may be troubling them, you should share this information with an appropriate member of staff straight away.

Some issues such as a child's appearance, hygiene, or general behaviour can be shared with any teacher or member of support staff in the School. Please do not worry that you may be reporting a small matter – we would rather you tell us things which turn out to be small, than miss a worrying situation.

However, if you think the matter is very serious and may be related to a child protection concern, where the child has been harmed or is at risk of harm e.g. physical, sexual, emotional abuse or neglect, you must talk to one of the people below immediately. Do not delay. If you are unable to contact them you can ask the school office staff to find them and ask them to speak to you straight away about a confidential and urgent matter.

### **The people you should talk to at this school are:**

#### **The Designated Safeguarding Leads are:**

**Helen Hart – Head of School at Singlegate Primary School**

**Julie Revell – Head of School at Lonesome Primary School**

**Salma Akhtar – Head of School at William Morris Primary School**

**Nathalie Bull – Chief Executive Headteacher**

**The contact details of the Designated Safeguarding Lead are displayed in the school office for the availability of all staff and visitors to the school.**

**In their absence, the Deputy Designated Safeguarding Leads are Despo Doel and Claire Lawler.**

#### **The Online Safety Lead is:**

**Nathalie Bull – Chief Executive Headteacher**

#### **The Nominated Governor for Safeguarding is:**

**Chris Young**

#### **The Nominated Governor for Online Safety is:**

**Chris Young**

**The Chair of Governors is:**

**Katy Willison**



**The Designated Safeguarding Lead (Singlegate)**

**Name:** Helen Hart

**Location:** Opposite the main office in Tower Hill.



**The Designated Safeguarding Lead (Lonesome)**

**Name:** Julie Revell

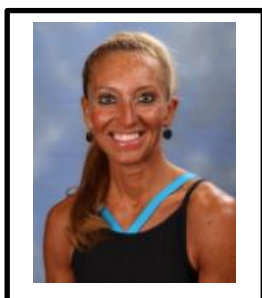
**Location:** Next to the main office.



**The Designated Safeguarding Lead (William Morris)**

**Name:** Salma Akhtar

**Location:** Next to the main office.



**The Designated Safeguarding Lead (Federated)**

**Name:** Nathalie Bull

**Location William Morris:** Next to the main office.

**Location Lonesome:** Next to the main office.

**Location Singlegate:** Adjacent to the school hall in Hyde Park Corner.



**Family Support Worker/Deputy DSL (Federated)**

**Name:** Claire Lawler

**Location Singlegate:** Family Support Worker room, upstairs in Tower Hill along Year 2 corridor.

**Location William Morris:** Family Support Worker room next to the library.



**Director of Operations/Deputy DSL**

**Name:** Despo Doel

**Location William Morris:** Hall office.

**Location Lonesome:** Next to the main entrance.

**Location Singlegate:** Opposite the main office in Tower Hill.



**Family Support Worker (Lonesome)**

**Name:** Chander Liburd

**Location:** Key Stage 2 corridor office

**Any allegation or disclosure involving someone who works with children in a paid or voluntary capacity must** be reported directly to the Chief Executive Headteacher or Head of School in her absence, unless it involves them and then it should be reported directly to the Chair of the Governing Body.

<p><b>Designated Safeguarding Leads:</b> Member of the leadership team who effectively deputises for the Safeguarding Lead.</p>	<p><b>Helen Hart (Singlegate)</b> <b>Contact:</b> 020 8395 8737 <a href="mailto:school@singlegate.merton.sch.uk">school@singlegate.merton.sch.uk</a></p> <p><b>Julie Revell (Lonesome)</b> <b>Contact:</b> 020 8648 1722 <a href="mailto:lonesome@lonesome.merton.sch.uk">lonesome@lonesome.merton.sch.uk</a></p> <p><b>Salma Akhtar (William Morris)</b> <b>Contact:</b></p>
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	020 8764 9765 <a href="mailto:office@williammorris.merton.sch.uk">office@williammorris.merton.sch.uk</a>
<p><b>Chief Executive Headteacher:</b> Responsible for implementing policies and procedures, allocating resources to the safeguarding team and addressing staff safeguarding concerns.</p>	<p><b>Nathalie Bull</b> <b>Contact:</b> 020 8395 8737 (Singlegate) 020 8764 9765 (William Morris) 020 8648 1722 (Lonesome) <a href="mailto:school@singlegate.merton.sch.uk">school@singlegate.merton.sch.uk</a> <a href="mailto:office@williammorris.merton.sch.uk">office@williammorris.merton.sch.uk</a> <a href="mailto:lonesome@lonesome.merton.sch.uk">lonesome@lonesome.merton.sch.uk</a></p>
<p><b>Family Support Workers:</b> Provides safeguarding support for the Designated Safeguarding Lead and supports families through direct and indirect work.</p>	<p><b>Chander Liburd</b> <b>Contact:</b> 020 8648 1722 <a href="mailto:lonesome@lonesome.merton.sch.uk">lonesome@lonesome.merton.sch.uk</a></p> <p><b>Claire Lawler</b> <b>Contact:</b> 020 8395 8737 (Singlegate) 020 8764 9765 (William Morris) <a href="mailto:school@singlegate.merton.sch.uk">school@singlegate.merton.sch.uk</a> <a href="mailto:office@williammorris.merton.sch.uk">office@williammorris.merton.sch.uk</a></p>
<p><b>Special Educational Needs Coordinator:</b> A staff member who provides advice, liaison and support for school staff and other agencies working with children with special educational needs and their parents or carers.</p>	<p><b>Maria Wilson (Singlegate)</b> <b>Contact:</b> 020 8395 8737 <a href="mailto:school@singlegate.merton.sch.uk">school@singlegate.merton.sch.uk</a></p> <p><b>Julie Revell (Lonesome)</b> <b>Contact:</b> 020 8648 1722 <a href="mailto:lonesome@lonesome.merton.sch.uk">lonesome@lonesome.merton.sch.uk</a></p> <p><b>Jacqueline Millward (William Morris)</b> <b>Contact:</b> 020 8764 9765 <a href="mailto:office@williammorris.merton.sch.uk">office@williammorris.merton.sch.uk</a></p>
<p><b>Local Authority Designated Officer:</b> Works within Children's Social Care and should be alerted to all cases in which there is an allegation of abuse of a child by a person who works with children where there is a concern that the person may have behaved in a way that has, or may have, harmed a child, possibly committed a criminal offense against/ related to a child or behaved towards a child in a way which indicates they would pose a risk of harm if they worked regularly or closely with children. The Designated Officer captures concerns, allegations or offences from outside of work and is involved from the initial phase of the allegation through to the conclusion of the case.</p>	<p><b>John Shelly</b> <b>Contact:</b> 0208 545 3187 / 0208 545 3179  <a href="mailto:lado@merton.gov.uk">lado@merton.gov.uk</a></p>
<p><b>Safeguarding/Child Protection Governor:</b> Ensures there are appropriate safeguarding children policies and procedures in place whether they are followed and, together with the rest of the Governing Body, remedies deficiencies and weaknesses that are identified.</p>	<p><b>Chris Young</b> <b>Contact:</b> c/o <a href="mailto:school@singlegate.merton.sch.uk">school@singlegate.merton.sch.uk</a></p>

	<a href="mailto:office@williammorris.merton.sch.uk">office@williammorris.merton.sch.uk</a> <a href="mailto:lonesome@lonesome.merton.sch.uk">lonesome@lonesome.merton.sch.uk</a>
<p><b>Chair of Governors:</b></p> <p>Takes the lead in dealing with allegations of abuse made against the Chief Executive Headteacher (and other members of staff when the Chief Executive Headteacher is not available), in liaison with the Local Authority; and on safe recruitment practices with the Chief Executive Headteacher.</p>	<p><b>Katy Willison</b></p> <p><b>Contact:</b></p> <p>c/o  <a href="mailto:school@singlegate.merton.sch.uk">school@singlegate.merton.sch.uk</a>  <a href="mailto:office@williammorris.merton.sch.uk">office@williammorris.merton.sch.uk</a>  <a href="mailto:lonesome@lonesome.merton.sch.uk">lonesome@lonesome.merton.sch.uk</a></p>
<p><b>Children and Families Hub:</b></p> <p>The Merton Local Authority Hub for advice and guidance when there are concerns about a child.</p>	<p><u>Children and Family Hub Request for Service form</u></p> <p><b>020 8545 4226</b> or <b>020 8545 4227</b></p> <p>out of hours: 020 8770 5000</p> <p><a href="mailto:candfhub@merton.gov.uk">candfhub@merton.gov.uk</a></p>
<p><b>Channel helpline:</b></p> <p><b>Channel is a voluntary,</b> confidential programme which safeguards people identified as vulnerable to being drawn into terrorism.</p>	<p><b>020 7340 7264</b></p>

## Introduction

The staff and Governors of the School are committed to ensuring that all pupils achieve the best outcomes in line with the Government's Every Child Matters: Change for Children programme.

That is for every child to:

- Be healthy
- Stay safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well being

This policy relates to the 'staying safe' outcome and contributes to multi-agency local safeguarding practice.

***'All people working in education and schools contribute to the safeguarding and promoting of children's welfare. All schools and further education institutions have a statutory duty to safeguard and promote the welfare of children. Consequently, the staff in these establishments play an important part in safeguarding children from abuse and neglect by early identification of children who may be vulnerable or at risk of harm and by educating children, about managing risks and improving their resilience through the curriculum. All schools and further education institutions should create and maintain a safe environment for children and young people, and should be able to manage situations where there are child welfare concerns.'***

The BeDifferent Federation aims to meet legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on the schools to protect children and young people at risk. The Schools will act in accordance with the following legislation and guidance:

- The Education Act 2002 (Section 175)
- The Children Act 1989 (and 2004 amendment)
- The Sexual Offences Act (2003)
- The Protection of Children Act (1999)
- The Safeguarding Vulnerable Groups Act (2006)
- The Protection of Freedoms Act (2012)
- The Female Genital Mutilation Act 2003 (Section 74 of the Serious Crime Act 2015)
- Statutory Guidance on FGM
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education 2024 (KCSIE)
- Sexual Violence and Sexual Harassment in Schools and Colleges 2021
- Relationships Education, Relationships and Sex Education and Health Education 2019
- The Maintained Schools Governance Guide
- The Education (Pupil Information) England Regulations 2005
- Merton Local Safeguarding Partnership Interagency Child Protection and Safeguarding Children Procedures
- Children Missing in Education – Statutory Guidance (2016)
- The Teachers Standards 2012
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Sexual violence and sexual harassment between children in schools and colleges (2018)
- Use of reasonable force – advice for Headteachers, staff and Governing Bodies
- Statutory Guidance on the Prevent Duty under the Counter Terrorism and Security Act 2015
- 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”)
- The Childcare Act 2006
- The Rehabilitation of Offenders Act 1974
- The Data Protection Act 2018
- The Equality Act 2010
- The Public Sector Equality Duty (PSED)
- The General Data Protection Regulation 2018
- The Human Rights Act 1998
- The School Staffing (England) Regulations 2009

- Statutory framework for the Early Years Foundation Stage

This policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2024 (KCSIE), and Merton Children's Safeguarding Partnership (MCSP) Procedures.

The BeDifferent Federation fully recognises its responsibilities for child protection and safeguarding. This policy sets out how the Federation will deliver these responsibilities. This is an overarching policy and forms part of a suite of documents and policies which relate to the child protection and safeguarding responsibilities of the school.

Other guidance can also be sought from the following sources:

- What to do if you are worried about a child (2015)
- Information Sharing Advice for safeguarding practitioners (2015)
- Merton's good practice guidance for identifying and safeguarding children missing from education (2015)
- FGM Mandatory reporting procedural information

## **TERMINOLOGY**

**Safeguarding and promoting the welfare of children is defined as:**

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment
- preventing impairment of children's health and development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- and taking action to enable all children to have the best outcomes.

'Safeguarding' is taken to mean all agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare are 'minimised' and where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other agencies.

**Safeguarding** is not just about protecting children from deliberate harm. It also relates to aspects of school life including:

- Children's attendance
- Children's health and safety
- The use of reasonable force
- Meeting the needs of children with medical conditions
- Providing first aid
- Educational visits
- Intimate care



- Internet or online safety
- Data security
- Appropriate arrangements to ensure school security

**Abuse:** a form of maltreatment of a child. Abuse includes neglect, inflicting harm or by failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by adults or other children.

**Child Protection:** the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Child:** all young people who have not yet reached their 18<sup>th</sup> birthday.

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

**Parent:** birth parents and other adults who are in a parenting role, including step parents, foster carers and adoptive parents.

**Staff:** those working with or on behalf of the School, in either a paid or voluntary role. Safeguarding and promoting welfare of children is the priority of all staff in the school.

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

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

**Designated Officer:** someone who works within Children's Social Care and should be alerted to all cases in which there is an allegation of abuse of a child by a person who works with children where there is a concern that the person may have:

- Behaved in a way that has, or may have, harmed a child;
- Possibly committed a criminal offence against/related to a child;
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.

The Designated Officer captures concerns, allegations or offences emanating from outside of work and is involved in the initial phase of allegation through to the conclusion of the case.

A school must have a Designated Safeguarding Lead. Larger schools may also have other staff trained as a Designated Safeguarding Lead who have the responsibilities of the role delegated to them.

'Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.' KCSIE 2024

'During term time, the designated safeguarding lead and/or a deputy should always be available (during college or school hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities'. KCSIE 2024

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:

- Merton Local Authority
- Integrated care boards (previously known as clinical commissioning groups) for an area within Merton
- The chief officer of police for a police area in Merton

## **POLICY REVIEW**

This policy is available on the school website and is available on request from the school office. Parents and carers are informed about this policy when their children join our school and through our school communication home and website.

This policy will be reviewed in full by the Governing Body on an annual basis unless an incident or new statutory guidance or local policy creates the need for an earlier review. Review is informed by the school's own experience of managing safeguarding and its own self-evaluation of this area.

This policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct, our policy to manage children who go missing from education and Part One of the statutory guidance '*Keeping Children Safe in Education*' 2024. All staff should read and understand at least Part 1 of this guidance.

## **AIMS**

An effective whole school Safeguarding of Children Policy is one that provides clear direction to staff and others about the expected behaviour when dealing with child protection issues and our legal duty to safeguard and promote the welfare of our children. All children regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection.

An effective policy makes explicit the school's commitment to the development of good practice and sound procedures. This ensures that child protection concerns, referrals and monitoring are handled sensitively, professionally and in ways that support the child's needs.

This policy applies to all children, staff, Governors, volunteers and visitors to our school.

There are five main elements to our Policy, which are described in the following sections:

- The types of abuse that are covered by the policy.
- The signs of abuse that all staff / anyone who has contact with a child or young person including governors and volunteers should look out for.
- Roles and responsibilities for safeguarding;
- Expectations of all staff / anyone who has contact with a child or young person including governors and volunteers with regard to safeguarding, and the procedures and processes that should be followed, including the support provided to children ;
- How the school will ensure that all staff / anyone who has contact with a child or young person including governors and volunteers are appropriately trained, and checked for their suitability to work within the School.

## **FRAMEWORK**

Key documents which inform this policy are:

- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education 2024 (KCSIE)
- Disqualification under the Childcare Act 2006 (updated 2018)
- FGM Act 2003 Mandatory Reporting Guidance 2016
- 'What to do if you are worried a child is being abused' 2015
- Teacher Standards 2011 (updated 2021)
- Information Sharing Advice for Practitioners' guidance 2018
- The Equality Act 2010
- National Police Chiefs Council – When to call the police

- Revised Prevent Duty Guidance for England and Wales 10 April 2019
- Sexual Violence and Sexual Harassment in Schools and Colleges 2021

Our school procedures for safeguarding children will be in line with the Merton Safeguarding Children Partnership Child Protection Procedures, which are based on the London Child Protection Procedures.

### **There are three main aims of our Safeguarding Children Policy.**

#### **Prevention**

Providing an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.

Raising awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

Ensuring that all adults within our school who have access to children have been rigorously checked as to their suitability using safe recruitment procedures.

#### **Protection**

Through the establishment of a systematic means of monitoring children, known or thought to be at risk of harm.

Through the establishment of structured procedures within the school which will be followed by all members of the school community in cases of suspected abuse.

Through the development of effective working relationships with all other agencies involved in safeguarding children.

#### **Support**

Ensuring that key concepts of Safeguarding children are integrated within the curriculum via PSHE and children are educated about risks associated with internet use and new technology.

Ensuring that children are listened to and their concerns are taken seriously and acted upon.

Working with others to support children who may have been abused to access the curriculum and take part in school life.

To meet these aims the school will:

- establish and maintain a safe environment in which children can learn and develop;

- practice safer recruitment in checking the suitability of staff and volunteers to work with children and ensuring up to date Disclosure and Barring Service (DBS) checks;
- raise awareness of child protection issues and through planned curriculum activities and opportunities, equip children with the skills needed to keep them safe from abuse both online and offline;
- ensure our children know that they can approach adults in the school if they are worried or in difficult and their concerns will be taken seriously and acted upon as appropriate
- implement effective procedures for identifying and reporting cases, or suspected case, of all forms of abuse;
- support children who have been abused or for whom there are welfare concerns in accordance with their agreed child protection; child in need plan or other care plan;
- ensure all staff members are aware of the school policy and guidance for their own and children's' use of mobile technologies and their associated risks within the context of the planned teaching of safeguarding issues in general;
- remain alert to the safeguarding needs of children who go missing from education and to the risks posed to them; and
- appoint a designated teacher, and their deputy, to promote the educational achievement of children who are looked after.

### **Reporting systems for our children**

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

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

To achieve this, we will:

- Put systems in place for children to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for all children
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Ensure that children know to report any concerns that are seen in school to a member of staff
- Ensure that our expectations for reporting are clear through Online Safety, PSCHE and our Relationships and Sex Education

### **ROLES AND RESPONSIBILITIES**

The Governing Body understands its statutory responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

Safeguarding also encompasses issues such as children's health and safety, bullying and a range of other issues, e.g. arrangements to meet the medical needs of children with medical conditions, providing first aid, school security, drugs and substance misuse.

Where there are statutory requirements, the school will have in place policies and procedures that satisfy and comply with any guidance issued by the secretary of state (DCFS 'Safeguarding Children & Safer Recruitment, Jan. 2007).

Safeguarding arrangements at The BeDifferent Federation are supported by a whole school approach underpinned by these key principles:

- Safeguarding is everyone's responsibility: all staff / anyone who has contact with a child or young person including governors and volunteers should play their full part in keeping children (includes vulnerable adults when in their setting) safe.
- Where there is a safeguarding concern, children's wishes, and feelings should be taken into account when determining what action to take and what services to provide. Systems should be well promoted, understood and easily accessible for children to confidently report abuse, knowing that their concerns will be treated seriously.
- We will aim to protect children using national, local and school child protection procedures.
- All Staff /anyone who has contact with a child or young person including Governors and volunteers should have a clear understanding regarding abuse and neglect in all forms, including how to identify, respond and report. This also includes knowledge of the process for allegations against professionals. Staff, (including Governors, volunteers and contractors) should feel confident that they can report all matters of safeguarding in the school where the information will be dealt with swiftly and securely, following the correct procedures with the safety and wellbeing of the children in mind at all times.
- There are effective procedures for dealing with allegations of child on child abuse.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through Relationships and Sex Education (RSE). We recognise that there cannot be a 'one size fits all' style and there needs to be a personalised and contextualised approach for more vulnerable children, victims of abuse and those with Special Education Needs and Disabilities (SEND).

We operate a child-centred approach: a clear understanding of the needs, wishes, views and voices of children.

We are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and they may not recognise their

experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, and/or sexual orientation or language barriers. This will not prevent us from having a professional curiosity and speaking to the DSL, if there are concerns about a child. It is also important that we determine how best to build trusted relationships with children and young people which facilitate communication.

## **TRAINING AND SUPPORT**

The Governing Body will ensure that:

We have a **Designated Safeguarding Lead** responsible for child protection who has undertaken appropriate **Designated Safeguarding Lead** training. We identify and train a nominated Governor for Safeguarding.

We have a senior member of staff who will act in the **Designated Safeguarding Lead's** absence, who has also received the multi-agency training.

The **Designated Safeguarding Lead** will attend appropriate training as required and will undertake regular child protection training in compliance with the statutory requirements for the role, at least on an annual basis. In Merton, Designated Safeguarding Leads are advised by the MSCB to be trained for the following levels:

- complete the single agency two day training for the school Designated Safeguarding Leads every two years;
- complete refresher training (half a day) in the intervening years (focusing on 'what's new');
- attend DSL forums on a twice termly basis. Where all DSLs in the school are unable to attend, one of the DSLs will attend and ensure that all information is shared with other DSLs;
- complete the multi-agency CC1 training (The Child Protection Process) delivered by the MSCB and, thereafter, one multi-agency training per year, perhaps focusing on the MSCB priorities.

All members of staff will receive appropriate training to develop their:

- understanding of signs and indicators of abuse, (appendix 1)
- understanding of how to respond to a child who discloses abuse, (appendix 2)
- understanding of the procedures to be followed in sharing a concern of possible abuse or a disclosure of abuse, (appendix 3).

The Designated Safeguarding Lead will provide regular safeguarding briefings and updates for staff to enable staff to keep up to date with the most recent local and national safeguarding advice and guidance on specific safeguarding issues including but not limited to handling sexual violence and harassment between children; extremism and radicalisation; child sexual exploitation and

Female Genital Mutilation. These updates could be provided via email, staff meetings or e-bulletins.

All staff, but especially the Designated Safeguarding Lead (or Deputy) should be considering the context within which incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

The BeDifferent Federation will incorporate signs of abuse and specific safeguarding issues on safeguarding into briefings, staff induction training, and ongoing development training for all staff.

New staff, supply staff and volunteers will be advised of the school's safeguarding arrangements and contact details of the **Designated Safeguarding Lead** as part of their induction into the school. They will also be provided with copies of the safeguarding policy, Staff Code of Conduct and our policy to manage children who go missing in education. They will be asked to read and understand part One of the statutory guidance '*Keeping Children Safe in Education*' (2024). They will also be given copies of the welfare concern form alongside information about how to complete the form and who to pass it onto. New staff will be given the opportunity to attend the Merton Children Schools and Families induction event for all staff within the children's workforce. This includes up to date information about the LA's approach to keeping children safe – the 'Wellbeing Model'.

Every new member of staff or volunteer will be given an induction period that will include essential information relating to:

- signs and symptoms of abuse;
- how to manage a disclosure from a child;
- how to record;
- how to manage issues of confidentiality;
- their responsibility to safeguard all children at our school;
- the remit of the Designated Safeguarding Lead;
- their role in identifying emerging problems; and
- their responsibility to share information with relevant professionals to support early identification and assessment.

The Governing Body will also undertake appropriate training at induction and then at regular intervals to ensure they are able to carry out their duties to safeguard all of the children at our school. Training will also support Governors in ensuring that the Federation's safeguarding policies and procedures are effective.

## **SAFER RECRUITMENT**



Preventing unsuitable people from working with children and young people is essential to keeping children safe. We will seek to ensure the suitability of adults working with children on the school site at any time and this includes any persons or organisations using our buildings or outside spaces in a letting or hiring agreement.

We will not accept a Curriculum Vitae (CV) unless alongside a full application form from anyone applying to work within the Federation. As part of our background checks we will consider an online search for shortlisted candidates.

Rigorous selection and recruitment of staff and volunteers is therefore a key responsibility of the Chief Executive Headteacher and the Governing Body. We will therefore ensure that the following areas are addressed.

Recruitment advertisements will include a child protection statement. DfES List 99 check; Criminal Records Bureau checks; identity checks and qualification checks will be carried out in accordance with the DCSF guidance "Safeguarding Children and Safer Recruitment in Education" 2007.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, schools and colleges must:

- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website;
- obtain a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity;
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website;
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate; and
- verify professional qualifications, as appropriate.

As a school we must:

- prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- where relevant, check the identity of a person being considered for appointment and their right to stay in the UK.
- undertake overseas checks if a staff member being employed or has returned from a period of employment from abroad.
- ensure staff and volunteers undergo appropriate checks via the Disclosure and Barring Service (DBS) relevant to their post and this includes any Prohibition checks necessary for the post.
- have procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed, removed due to safeguarding concerns or would have been had they not resigned; aware that this is a legal duty.
- have at least one person on any appointment panel who has undertaken Safer Recruitment Training, including a Governor.
- ensure that our volunteers are adequately supervised, being aware of the differences between supervised and unsupervised interaction with the children and have risk assessments in place for volunteers in the school undertaking activities with the children.
- ensure that all our governors have the enhanced DBS and other checks that may be required, including a check through the Teaching Regulation Agency Teacher Services to check if a person we wish to recruit as a governor is barred as a result of being subject to a Section 128 direction.
- ensure that we understand the requirements if we are hiring our premises around asking the relevant questions, making sure checks are in place to ensure safeguarding the children / young people who attend clubs, holiday schemes and other activities on school premises.
- be mindful of who we are hiring our premises to and refuse the hiring of premises for any activity deemed not in the interests of the children/young people the school, the local community and/or viewed to be inflammatory e.g.- banned political groups.

We will in all cases for example check on;

- the identity of candidates;
- professional qualifications;
- the right to work in the UK;
- make overseas checks where relevant;
- ask for and follow up at least two references (including one from the candidate's current or most recent employer)
- scrutinise applications for gaps in employment
- contact the referees to provide further clarification as appropriate.

We will have a Single Central Record which will cover all staff, including Governors, and volunteers, frequent visitors, agency and supply, and others according to their role and responsibility. We will ensure this record is regularly updated, reviewed in line with National and Local requirements and ready for audit.

All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, Staff Behaviour Policy (code of conduct), Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and Keeping Children Safe in Education 2024 part 1 and annex B. Part 2 of this guidance relates to "The Management of Safeguarding" and will be issued to all Governors. Any staff who do not directly work with children will be issued with Annex A of Keeping Children Safe in Education 2024.

Schools and sixth form colleges should ensure that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service.

Where an enhanced DBS certificate is required, it must be obtained from the candidate before, or as soon as practicable after, the person's appointment.

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach. All staff understand that, under the Sexual Offences Act 2003, that it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust.

The School Code of Conduct sets out our expectation of staff behaviour and is signed by all staff members.

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

### **Trainee/student teachers**

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

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

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

### **Governors**

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

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

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

### **Visitors**

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

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

Visitors are expected to sign in using the InVentry system and wear a visitor's badge or sticker which clearly states their name and who they are on site to visit.

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

- › Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- › The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known

to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

## **RECORDS AND MONITORING**

Thorough records are essential to effective safeguarding practice. Our schools are clear about the need to record any concern held about a child/ren within our school, the need to keep safeguarding records separate from the main school filing and in a locked cabinet.

The Governing Body is responsible for reviewing this policy on an annual basis and ensuring that practice is in line with the policy.

Child Protection information is stored and handled in line with the Data Protection Act 2018, which requires that information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure

Child Protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they must refer the request to the Designated Safeguarding Lead.

Child Protection records prior to the introduction of the online system were paper based. Children who attended the school prior to this may have a paper record which is locked securely separate from the child's school file. All other records are held on our online system, MyConcern, which is maintained by the Safeguarding Administrator.

Child protection information will be stored and handled in line with Data Protection Act 2018 principles, which require that information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on unencrypted laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be encrypted and kept in locked storage. Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The General Data Protection Regulation (GDPR) states that within education, some sensitive information about children is processed that is not set out in the legislation as a 'special category personal data'. This includes safeguarding data. The DfE considers it best practice that when considering security and business processes about such data, that they are also treated with the same 'high status' as the special categories set out in law.

In relation to Safeguarding, GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, children's social care and other local agencies is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk.

### **Transfer of child protection files**

We will follow the Local Authority's current guidance and system for the secure transfer of school files between primary and secondary school. This ensures that child protection files are transferred to the new school within five days, using a secure method and that confirmation of receipt is obtained. Medical records will also be forwarded as a matter of priority. When receiving files, the school ensures that key staff such as the Designated Safeguarding Lead and SENCO are aware as required. Where a child transfers to another education setting at any other time, the same principles are followed.

In addition to the child protection file, the Designated Safeguarding Lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

### **RESPONSIBILITIES OF THE CHIEF EXECUTIVE HEADTEACHER**

The Chief Executive Headteacher will:

- ensure that staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, Staff Code of

Conduct, Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and [Keeping Children Safe in Education 2024 part 1 and annex B](#).

- ensure that resources are allocated to enable the **Designated Safeguarding Lead** and other staff as needed, to attend strategy discussion, inter-agency meetings, contribute to assessments etc.
- ensure that appropriate members of staff have received training on the use of the Common and Shared Assessment (a standardised early assessment) in order to identify any additional needs that a child or young person may have so that they may receive appropriate support at an early stage
- ensure that all members of staff are trained and receive regular updates about online safety
- ensure that the Heads of School will take on the above responsibilities in the absence of the Chief Executive Headteacher
- be responsible for receiving allegations against staff and volunteers
- record details of all allegations against staff and volunteers and report to the LA Allegations Manager in order to ensure allegations are dealt with in an objective and transparent way
- consult with the Local Authority Designated Officer before responding to an allegation
- be responsible for carrying out any actions agreed with the Local Authority Designated Officer and reporting on outcomes
- ensure that the relevant staffing ratios are met, where applicable
- ensure that each child in the Early Years Foundation Stage is assigned a key person
- oversee the safe use of technology, mobile phones and cameras in the Early Years Foundation Stage setting

## **RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD FOR THE SAFEGUARDING OF CHILDREN**

1. Encourage a culture of listening to children and taking account of their wishes and feelings and in any measures the school may put in place to protect them.
2. Referring a child if there are concerns about a child's welfare, possible abuse or neglect to the MASH (Multi Agency Safeguarding Hub).

3. Ensuring that detailed and accurate written records of concerns about a child are kept, even if there is no need to make an immediate referral.
4. Ensuring that all records have a clear and comprehensive summary and details on how the concern was followed up and resolved.
5. Ensuring that all such records are kept confidentially, securely and are separate from children's records. The file will contain a front sheet listing dates and a brief entry to provide a chronology.
6. Ensuring that when a child transfers school, their child protection file is passed to the new school within 5 days of starting a new term, within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
7. Ensuring that an indication of further record-keeping and reviews is marked on the child's records.
8. Acting as a focal point for staff concerns and liaising with other agencies and professionals.
9. Ensuring that either they or another appropriately informed member of staff attends case conferences, family support meetings, core groups, or other multi-agency planning meetings, contributing to the Framework for Assessments process, and provide a report which has been shared with the parents.
10. Ensuring that all school staff and volunteers are aware of the school's Safeguarding Policy and Procedures, and know how to recognise and refer any concerns.
11. Taking the lead responsibility for child protection and wider safeguarding (including online safety and understanding the filtering and monitoring systems which are in place). Refer to DfE Guidance 'Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges'
12. Ensure that all staff, within 3 months of employment at the BeDifferent Federation and updated once a year thereafter, sign to say they have read, understood and agree to work within the school's Safeguarding Policy, staff Code of Conduct, School Behaviour For Learning Policy and Keeping Children Safe in Education 2024 (KCSIE) Part 1 and annex B and ensure that the policies are used effectively.
13. Attend appropriate training as required by the Merton Safeguarding Children Partnership in order to keep up to date with current knowledge in fulfilling the role.
14. Attend the training provided specifically for the designated persons at least once every two years.
15. Ensure that all staff receive appropriate training once every three years.



16. Attend Designated Teacher network meetings organised by the CYPL Safeguarding Children Coordinator, to ensure that staff are updated regularly on current child protection issues such as Sexually Active Children, Female Genital Mutilation, Forced Marriage of a Child and to provide a forum for the development of good practice.
17. Providing an annual report for the Governing Body, detailing any changes to the policy and procedures; training undertaken by the designated person, and by all staff and governors; and the number of children who have a 'Child Protection Plan'.
18. Ensure that the school will be included in statutory discussions in cases of child on child abuse.
19. Be aware of the requirement for children to have an Appropriate Adult. Guidance can be found under the Police and Criminal Evidence Act 1984 Code C revised 2019 – Code of Practice for the detention, treatment and questioning of persons by Police Officers.
20. Ensure that the Federation complies with The Human Rights Act 1998, setting out the fundamental rights and freedoms that everyone in the United Kingdom is entitled to. It is unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights, specifically:
  - a. Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
  - b. Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
  - c. Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
  - d. Article 2: protects the right to education
21. The Federation will contravene the Equality Act 2010 by discriminating against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Following the identification of a concern, next steps will include managing any support for the child internally via the school's own pastoral processes; an early help assessment; or a referral for statutory services, for example as the child might be in need, is in need or likely to suffer harm. The Local Authority should make a decision within one working day of a referral being made about the type of response that is required and should let the referrer know the outcome.

The **Designated Safeguarding Lead** is also the Prevent Lead for each school.

## **RESPONSIBILITIES OF NON-TEACHING AND TEACHING STAFF WITHIN THE SCHOOL**

Any member of staff concerned about a child must follow the school procedures outlined in Appendix 3 and, without delay, inform the Designated Safeguarding Lead of their concern. School staff should be prepared to identify children who may benefit from early help and understand their role in identifying difficulties and sharing information.

1. Undertake appropriate training in relation to safeguarding and promoting the welfare of children at least once every three years and apply in practice.
2. Be alert to signs of abuse and report immediately to the **Designated Safeguarding Lead**
3. Have an awareness of the role of the DSL, part 1 and annex B of Keeping Children Safe in Education 2024, the schools Child Protection and Safeguarding Policy, Staff Code of Conduct, School Behaviour For Learning Policy and procedures relating to the safeguarding response for children who go missing from education.

## **CONFIDENTIALITY**

We recognise that all matters relating to the safeguarding of children are confidential.

The **Designated Safeguarding Lead** will disclose personal information about a child to other members of staff on a need to know basis only.

All staff understand that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

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

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

- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.

We will always share our intention to refer a child to Children's Social Care with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

Staff should only discuss concerns with the Designated Safeguarding Lead who will then decide who else needs to know the information.

## **SUPPORTING STAFF**

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the **Designated Safeguarding Lead** and to seek further support. This could be provided for all staff by, for example, the Chief Executive Headteacher, by Occupational Health, and/or a teacher/trade union representative as appropriate.

## **ALLEGATIONS AGAINST STAFF**

All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable to that your work with individual children or meetings with families are conducted in view of other adults and with the door open.

Keeping Children Safe in Education 2024 Part 4 is now in 2 sections.

Section 1 deals with allegations against staff which meets the threshold of being investigated by the Local Authority Designated Officer (LADO).

Allegations could be made about a teacher or member of staff (including volunteers) in a school if they have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

We understand that a child may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Chief Executive Headteacher or the Head of School if the Chief Executive Headteacher is not present.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay. Inform the Head of School, if the disclosure is an allegation against a member of staff, supply staff or volunteer or is a low level concern.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The Local Authority Designated Officer (LADO) should be sought for advice with regards to all allegations. The Local Authority Designated Officer is:

**John Shelly – 0208 545 3187 / 0208 545 3179**

The following definitions should be used when determining the outcome 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;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

The Chief Executive Headteacher should immediately discuss the allegation with the Local Authority Designated Officer. The purpose of an initial discussion is for the Local Authority Designated Officer and the case manager to consider the nature, content and context of the allegation and agree a course of action. The Local Authority Designated Officer may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the Local Authority Designated Officer in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the Local Authority Designated Officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the Local Authority Designated Officer what action should follow both in respect of the individual and those who made the initial allegation. The case manager should inform the accused person about the allegation as soon as possible after consulting the Local Authority Designated Officer. It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

Schools may wish to use the additional definition of 'unfounded' to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step. If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working Together to Safeguard Children 2015. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the Local Authority Designated Officer should discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative. In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the Local Authority Designated Officer should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior leader. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff will therefore be made aware of their duty to raise concerns about the attitude or actions of colleagues.

If an allegation is made to a member of staff concerns the behaviour of the Chief Executive Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult the Local Authority Designated Officer for without notifying the Chief Executive Headteacher. Where the Chair of Governors is not contactable on that day, the information must be passed to and dealt with by either the member of staff acting as the Chief Executive Headteacher or the Vice Chair or Governors. The Chair of Governors for the school is:

Name: Katy Willison

Tel No: c/o 0208 395 8737 / 0208 764 9765 / 020 8648 1722

In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair of Governors for the school is:

Name: Chris Young

Tel No: c/o 0208 395 8737 / 0208 764 9765 / 020 8648 1722

If an allegation relates to an incident where an individual or organisation is using the school premises for running an activity for children, we will follow our school safeguarding policies and procedures, informing the LADO as we would with any safeguarding allegation.

Where appropriate, we will inform Ofsted of the allegation and actions taken, within the necessary timescale.

Section 2 of Part 4 of Keeping Children Safe in Education 2024 outlines how to deal with low level concerns. These will not be treated as insignificant but will require a report to the Head of School or the LADO. If the concern is reported to the DSL, the DSL will inform the Chief Executive Headteacher in a timely fashion according to the nature of the concern and the Chief Executive Headteacher will make the ultimate decision on how to respond.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

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

- being over 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, or,
- using inappropriate sexualised, intimidating or offensive language.

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

Low-level concerns about a member of staff should be reported to the Head of School. Where a low-level concern is raised about the Head of School, it should be shared with the Chief Executive Headteacher.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our Behaviour For Learning Policy.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Our School Complaints procedure will be followed where a parent raises a concern about the handling of the process of dealing with safeguarding. The School Complaint policy is on the school website and shared with families in the school newsletter.

Complaints from staff are dealt with under the school complaints and disciplinary and grievance procedures.

### **PHYSICAL INTERVENTION/POSITIVE HANDLING**

Our policy on physical intervention/positive handling by staff is set out separately, as part of our Behaviour For Learning Policy. It complies with the DCSF non-statutory guidance

“Use of Force to Control or Restrain Pupils” 2007, which is available on Teachernet. This guidance replaces Circular 10/98, which should no longer be used.

Such events should be recorded and signed by a witness.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under the LA safeguarding of children or disciplinary procedures.

The school will follow the DfE guidance for schools on the ‘Use of reasonable force – advice for Headteachers, staff and Governing Bodies’, and also the Local Authority’s policy for schools on this subject.

### **SUPPORTING VULNERABLE CHILDREN**

We recognise that some children may be especially vulnerable to abuse. Additional barriers can exist, for example, when recognising abuse and neglect for children with Special Educational Needs (SEN). We recognise that children who are abused or neglected may find it difficult to develop a sense of worth and view the world in a positive way. Whilst at school their behaviour may be challenging and we recognise that some children who have experienced abuse may harm others.



We will try to ensure that our schools provide a stable and secure place for all children through the development of policies and procedures that encourage self-esteem and self-motivation and positive behaviour.

Children who may be particularly vulnerable to abuse will be given special consideration. These children might be:

- disabled or have special educational needs
- young carers
- living in a domestic abuse situation
- affected by parental substance abuse
- affected by mental health issues
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying including online, homophobic or racism
- living in temporary accommodation
- live transient lifestyles
- missing education
- persistently absent from school
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- susceptible to extremism or radicalisation
- involved directly or indirectly in sexual exploitation or trafficking
- children who do not speak English as a first language
- at risk of FGM or forced marriage

## **The School Community**

We follow the procedures set out by the Merton Safeguarding Children's Partnership. In accordance with the above procedures, we carry out an annual audit of our Safeguarding provision (S175 Safeguarding Audit, which is a requirement of the Education Act 2002 & 2006). The current priorities of the MSCP are:

**1. Early Help:** is part of a whole system approach and is based on a clear understanding of local need.

### **2. Think Family**

**a) Domestic Abuse:** To protect children who are at risk of domestic abuse by working effectively with families to create a safe parenting environment; and

**b) Neglect:** To help children who are at risk of experiencing neglect. The Partnership monitors, coordinates and evaluates the work of the all agencies to ensure children at risk of neglect receive help and protection.

**3. Contextual Safeguarding:** We safeguard children who are at risk of significant harm in contexts beyond their families.

The School will take account of Keeping Children Safe in Education (2024) to ensure that policies, procedures and training in the School are effective and comply with the law at all times. In particular, the School will ensure that:

- appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
- we have a Designated Safeguarding Lead for child protection and a Deputy Designated Safeguarding Lead who will fulfil the role when the Designated Safeguarding Lead is unavailable. All designated staff will receive and access regular and appropriate training for this role;
- we work together with other agencies to ensure adequate arrangements within our school to identify, assess and support children suffering from harm or for whom there is a welfare concern, and to ensure there is a co-ordinated offer of early help when needs are identified;
- all staff recognise their individual responsibilities for reporting concerns and the importance of sharing information between professionals and local agencies to ensure no child is placed at risk of harm;
- all staff are provided with up to date training and information;
- children are safeguarded from potentially harmful and appropriate online material by ensuring appropriate filters and monitoring systems are in place;
- there is a clear policy in place on the use of mobile technology in the school;
- children are taught about safeguarding through teaching and learning opportunities as part of providing a broad and balanced curriculum;
- we operate safer recruitment procedures;
- there are procedures in place to handle allegations against teachers, the Chief Executive Headteacher, volunteers and other staff;
- any member of staff found not suitable to work with children is reported to the Disclosure and Barring Service for consideration for barring, including following resignation, dismissal or in the case of a volunteer, when we cease to use their services as a result of a substantiated allegation;
- policy and practice minimises the risk of child on child abuse;
- children's wishes and feelings are taken into account when determining what actions to take, whilst being clear that confidentiality cannot be agreed, and always acting in the best interests of the child;
- appointing a designated teacher to promote the educational achievement of children looked after and children who have left care through adoption, special guardianship or child arrangement orders or who have been adopted from state care outside England and Wales;

- children are reassured that the law is in place to protect rather than to criminalise them; and
- recognising that children with Special Educational Needs can provide additional safeguarding challenges.

Our school will establish and maintain an ethos where:

- safeguarding is threaded through everything we do in our school, including the curriculum, where opportunities will be provided which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help;
- children feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff at our school if they are worried or concerned about something; be it with regard to adults or their peers;
- we recognise that staff at our school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are encouraged to maintain an attitude of *'it could happen here'* where safeguarding is concerned;
- through robust training and induction, all staff and regular visitors will know how to recognise indicators of concerns, how to respond to a disclosure from a child and how to record and report this information;
- every child will know what the adult will have to do with any information the child has disclosed; and
- at all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with *'Working Together to Safeguard Children'* (2015).

## **BULLYING**

Our procedures on the prevention and management of bullying are set out in our Behaviour For Learning Policy.

## **CYBERBULLYING**

The school's procedures to prevent and manage 'cyberbullying' are set out in our Behaviour For Learning Policy and our E-Safety Policy.

## **ONLINE SAFETY**

All children are encouraged to use and enjoy the internet both at school and at home. We promote the use of the internet through our online homework system and through in school research projects. All children and families are made aware of the expectations for safe use of the internet and staff teach children how to be safe when online. The E-Safety Policy is available on the school

website for staff and families to refer to in order to safeguard children when they are online.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The online safety leader at Singlegate Primary School is Emma Masters, at Lonesome Primary School is Julie Revell and at William Morris Primary School is Salma Akhtar.

We will include the teaching of safeguarding across the curriculum and through Relationships Education/Relationships and Sex Education. PSHE opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include online safety, (referencing the DfE publication 'Teaching online safety in School' 2019); what constitutes a healthy relationship both online and offline; anti-bullying work; transition support; prevention of radicalisation etc.

We ensure that monitoring systems are in place using a program from the London Grid for Learning, which is checked weekly by the Designated Safeguarding Lead and any actions taken. Appropriate online filtering and monitoring systems are in place. All Senior Leaders and relevant staff are aware of the systems, manage them effectively and know how to escalate concerns when identified.

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules or the staff member has good reason to suspect the device may be used to:

- cause harm,
- disrupt teaching,
- break school rules,
- commit an offence,
- cause personal injury, or
- damage property.

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of children, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **The 4 key categories of risk**

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

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

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

Educate children about online safety as part of our curriculum. For example:

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

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

Any data, files or images that are believed to be illegal must be passed to the police as soon as is practicable, including pornographic images of children, without deleting them.

Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school's Behaviour for Learning Policy. The school follows DfE '[Searching, screening and confiscation at school](#)' guidance.

The BeDifferent Federation's policy on the use of mobile phones is included on the Staff Code of Conduct.

The Governing Body will ensure that all staff undergo Safeguarding and Child Protection Training, including online safety training providing an understanding

of the expectations and applicable roles and responsibilities in relation to filtering and monitoring.

The Governing Body should consider the number and age range of children, who are potentially at greater risk of harm and how often they access the IT system.

## **ARTIFICIAL INTELLIGENCE**

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

The BeDifferent Federation recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard children. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose children to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

The BeDifferent Federation will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour for Learning policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

## **RACIST INCIDENTS**

Our procedure when dealing with racist incidents is set out in our Equality Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

## **PREVENTING RADICALISATION AND EXTREMISM**

Protecting children from the risk of radicalisation is supportive of our wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks,

all staff will be alerted to changes in children's behaviour which could indicate that they may be in need of help or protection. All staff will use their professional judgement in identifying children who might be susceptible to radicalisation and act proportionately which may include making a referral to the designated child protection officer.

## **PREVENT**

From the 1st July 2015 all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 (the Prevent guidance). The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and Information Technology policies. The BeDifferent Federation will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be susceptible to radicalisation and what to do to support them.

### **Indicators:**

There are a number of behaviours that may indicate a child is at risk of being radicalised or exposed to extreme views. These include:

- spending increasing time in the company of other suspected extremists
- changing their style or personal appearance to accord with the group
- day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of materials or symbols associated with an extremist cause
- attempts to recruit others to the group/cause
- communications with others that suggests identification with a group, cause or ideology
- using insulting to derogatory names for another group
- increase in prejudice related incidents, these may include:
  - Physical or verbal assault
  - Provocative behaviour
  - Damage to property
  - Derogatory name calling
  - Possession of prejudice-related materials
  - Inappropriate forms of dress



- Refusal to co-operate
- Condoning or supporting violence towards others

**Supportive measures:**

The Designated Safeguarding Lead who has undertaken Prevent awareness training will provide advice and support to other members of staff on protecting children from the risk of radicalisation.

At The BeDifferent Federation children are safe from terrorist and extremist material when accessing the internet in schools. We ensure that suitable internet filtering is in place and that we teach online safety as part of our computing and personal, social and emotional curriculum.

**SEXUAL EXPLOITATION/SUBSTANCE MISUSE**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child’s physical and emotional health. It may also be linked to child trafficking. All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the Designated Safeguarding Lead.

Risk factors of sexual exploitation may include:

- Going missing
- Engagement in offending
- Disengagement from education
- Using drugs or alcohol
- Unexplained gifts/money
- Repeat concerns about sexual health
- Decline in emotional wellbeing

We will reassure all children who are victims of abuse that they will be taken seriously and will be supported. They should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

All suspected or actual cases of sexual exploitation are a safeguarding concern in which child protection procedures will be followed; this will include a referral to the police. If any staff are concerned about a child, they will refer to the Safeguarding Designated Lead/s within the school.

We will ensure that following any safeguarding concern the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

## **CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL or GENDER QUESTIONING (LGBT)**

The fact that a child or young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT may be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The BeDifferent Federation will provide a safe space for children to speak out or share their concerns with a member of staff.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning child, we will take a cautious approach as there are still unknowns around the impact of social transition, and a child may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the child). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

LGBT inclusion is part of the statutory Relationship and Sex Education curriculum and there is a range of support available to support schools to counter homophobic, biphobic and transphobic bullying and abuse.

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

## **DOMESTIC ABUSE**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, financial, psychological or sexual abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also include other types of abuse.

Domestic abuse may include but is not limited to:

- Slapping

- Punching
- Kicking
- Bruising
- Sexual assault and rape
- Ridicule
- Constant criticism
- Threats
- Manipulation
- Sleep deprivation
- Social isolation
- And other controlling behaviours

Living in a home where domestic abuse is happening is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of positive, healthy relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The Federation is enrolled onto the Operation Encompass scheme, a joint project between the Metropolitan Police and Merton Schools; where our DSL is notified of all domestic abuse incidents that have occurred and been reported to police in the previous 24 hours which involve a child attending one of our schools. This provides an opportunity for us to ensure that the right support is in place at the right time for these children.

## **CHILD CRIMINAL EXPLOITATION AND GANGS**

There are a number of areas in which young people are put at risk by gang activity, both through participation in and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity with children being exploited to move and store drugs and money. 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more

importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. Children might be involved in violence, be pressured into doing things like stealing, carrying drugs or weapons or be abused, exploited and put into dangerous situations. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The school is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

A referral to the MASH will be made when any concern of harm to a child because of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the MASH. If there is concern about a child's immediate safety, the Police will be contacted on 999.

### **CHILDREN WITH MEDICAL NEEDS**

There is no legal duty for school staff to administer medication to children and the staff who do so act in a voluntary capacity. Staff who provide medication, will be appropriately trained and be provided with all relevant information about the child's needs. No children under 16 will be given medication without his or her parent's/carer's consent.

### **LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN**

The Chief Executive Headteacher will ensure that a member of staff is appointed as a Designated Teacher for Looked After Children who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The education staff will contribute to the 'in care reviews' and/or case conferences of children who are subject of a child protection plan and to the Personal Education Plan.

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

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

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

As part of their role, the designated teacher will:

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

The Governing Body and school leaders will work with the Local Authority to promote the educational achievement of looked after children, and children who have been previously looked after. The designated teacher will have appropriate training and the relevant qualifications and experience. All staff will have the skills, knowledge and understanding to keep these children safe.

In addition to their responsibility with Looked After/Previously Looked After Children, the Virtual School Headteacher has strategic responsibility for promoting the educational outcomes of children with an allocated social worker. This includes the oversight of attendance, attainment and progress. The Virtual School Headteacher will engage with key professionals to help them understand the role they have in improving outcomes for children.

## **PRIVATE FOSTERING ARRANGEMENTS**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The BeDifferent Federation recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the MASH.

The Designated Lead for looked after children in the school is:

**Helen Hart – Head of School, Singlegate Primary School**

**Julie Revell – Head of School, Lonesome Primary School**

**Salma Akhtar – Head of School, William Morris Primary School**

**Nathalie Bull – Chief Executive Headteacher**

## **WHISTLEBLOWING**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

We adhere to Merton's Whistleblowing Policy which is available on the school extranet for all staff.

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the Chief Executive Headteacher or the Chair of Governors.

## **CHILD MEDIA AND PHOTOGRAPHY**

At The BeDifferent Federation we have taken a sensible and balanced approach that is based on parental consent to take pictures and video images that capture children's achievements; activities and promote success. Wherever possible, we take steps to ensure anonymity in the use of images taken by the school for these described purposes.

The BeDifferent Federation acknowledges that the majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images. To help protect our children, we will implement the following safeguards:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- use only the child's first name with an image
- ensure children are appropriately dressed

-encourage children to tell us if they are worried about any photographs that are taken of them

-seek parents cooperation when taking images at school events to ensure that images of unrelated children are not taken without consent or posted to the Internet or other medium without consent of the parents of the children involved

-have a clear Code Of Conduct regarding the staff's use of mobile technology while on school premises.

The BeDifferent Federation are happy for parents to take photos and videos of their children at events when given permission to do so, but we request that these images are not distributed or put online. This is to protect all members of the community.

Parents are reminded that:

- once posted and shared online any image or video can be copied and will stay online forever
- some children are at risk and MUST NOT have their image put online. Not all members of the community will know who they are
- some people do not want their images online for personal or religious reasons
- some children and staff may have a complex family background which means that sharing their image online can have unforeseen consequences
- therefore in order to keep all members of the community safe we must all 'Think before we post' online.

This is to protect all members of the community.

## **FEMALE GENITAL MUTILATION**

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

### **Indicators that a child has undergone FGM include:**

- returning to school after a period of absence and displaying changes in behaviour. These changes may also be observed after a school holiday and include, but are not limited to:
  - Being tearful or clingy
  - Displaying anxious behaviours
  - Aggression towards others
  - Being unusually withdrawn
  - Not participating in Physical Education
- spending long periods of time on the toilet
- complaining of pain in their genital area

- having difficulty walking, sitting or standing or restricted movement
- being reluctant to talk about what they did over the holiday/while absent from school
- uncharacteristically wetting themselves or soiling their clothing
- change in appetite
- treatment for an infection in the genitals

**Indicators that a child may be at risk from FGM include:**

- talking about going abroad, particularly to some parts of the world including, but not limited to, countries in Africa and the Middle East
- talking about an elderly female relative visiting for a 'special occasion'
- talking about 'becoming a woman'
- if it is known that other family members have undergone FGM
- girls aged 5-8 years old are most at risk (although it can be carried out at any time from infancy up to early adulthood)

The **Designated Safeguarding Lead** will:

- ensure that all of the school staff are aware of the indicators of the possibility that a child may be undergoing or has undergone female genital mutilation
- activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care
- place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions.

**FORCED MARRIAGES**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the



marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the MASH.

### **ONE CHANCE RULE**

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The school are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

### **'HONOUR BASED' VIOLENCE**

The School recognises the range of crimes which are encompassed within the definition of 'honour based' violence, including FGM, forced marriages and practices such as breast ironing, which are detailed in this policy. These are safeguarding issues and will be treated as such.

### **SELF HARMING AND SUICIDAL BEHAVIOUR**

Self-harm and suicide threats and gestures by a child put the child at risk of significant harm, and should always be taken seriously. They may also be indicative of psychological or emotional disturbance triggered by physical, sexual and/or emotional abuse or chronic neglect which may also constitute significant harm.

### **SEXUALLY ACTIVE CHILDREN**

#### **Children under 13 years**

A child under 13 is not legally capable of consenting to sexual activity. Any offence under the Sexual Offences Act 2003 involving a child under 13 is very serious and should be taken to indicate a risk of significant harm to the child.

Cases involving children under 13 should always be discussed with the **Designated Safeguarding Lead.**

Under the Sexual Offences Act, penetrative sex with a child under 13 is classed as rape. Where a member of staff is concerned that a child is involved with penetrative sex or other intimate sexual activity, there will always be reasonable cause to suspect that a child, whether girl or boy, is suffering or is likely to suffer significant harm.

The case should be referred to the LA children's social care followed by a strategy meeting/discussion to discuss appropriate next steps.

### **CHILD ON CHILD ABUSE (now incorporated into Part 5 of Keeping Children Safe in Education 2024)**

Children are capable of abusing their peers. All staff will make clear through teaching and interaction with children that child on child abuse is never tolerated or passed off as 'banter'. Child on child abuse can take on many forms, including sexting and online abuse. Gender issues can be prevalent when dealing with child on child abuse, including children being sexually touched or being subject to initiation or hazing type violence. Guidance on dealing with sexting can be found in appendix 6.

The forms of child on child abuse are outlined below:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual Violence and Sexual Harassment
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals.

The term peer-on-peer abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence). It is more likely that girls will be victims and boys' perpetrators but that all child on child abuse is unacceptable and will be taken seriously.

It will not be passed off as 'banter', 'boys being boys' or 'part of growing up', and staff will challenge inappropriate behaviour between children. Any downplaying of certain conduct can lead to a culture of unacceptable behaviour which will lead to children not reporting or normalising abuse causing an unsafe environment. We are clear that there will be a zero-tolerance approach to any form of abuse including child on child abuse.

The BeDifferent Federation understands that even if there are no reports of peer-on-peer abuse, this does not mean that it is not happening.

Governing bodies and leaders should also be aware of the detailed guidance published by the DfE on this subject 'Sexual violence and sexual harassment between children in schools and colleges (2021)'.

All allegations of child on child abuse will be taken seriously, investigated and dealt with within the context of the school Behaviour for Learning Policy.

In some cases, children will find it difficult to tell staff about the abuse so it may come via a third party. Children should never be given the impression that they are creating a problem by reporting sexual abuse or harassment. Children will be listened to carefully and without judgement.

### **SERIOUS VIOLENCE**

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

### **HARMFUL SEXUAL BEHAVIOUR**

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is 'harmful sexual behaviour' (HSB). The term has been widely adopted in child protection and is used in Keeping Children Safe in Education 2024. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

Sexual behaviour between children will be considered harmful, if one of the children is much older, if there is more than 2 years difference in age or one child is in pubescent and the other is not. A younger child can abuse an older child, particularly if one has power over the other, for example, with a disability or Special Educational Needs.

Children displaying HSB have often experienced their own abuse and trauma and will be offered appropriate support.

### **CHILDREN AT RISK OR INVOLVED IN SERIOUS VIOLENT CRIME**

Serious violent youth crime is defined by the Home Office Assessment of Policing and Community Safety (APACS) as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19'

Indicators:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Additional risk factors include:

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

## **SHARING NUDES AND SEMI-NUDES**

The practice of children sharing nudes and semi nudes (formerly known as sexting or Youth produced Sexual Imagery) and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Nudes and semi nudes refer to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- Voyeurism Act 2019 – Upskirting is now a criminal act in the UK. The response to this in schools need to be the same as child on child sexual abuse and may including contacting the police. The Criminal Prosecution Service (CPS) defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders. "

Children are taught about the issues surrounding the sharing of nudes and semi-nudes in an age appropriate way through our Online Safety curriculum and Sex and Relationships Education curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Children also learn the strategies and skills needed to manage:

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

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

Teaching follows best practice in delivering safe and effective education, including:

- › Putting safeguarding first
- › Approaching from the perspective of the child
- › Promoting dialogue and understanding
- › Empowering and enabling children and young people
- › Never frightening or scare-mongering
- › Challenging victim-blaming attitudes

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance [Sharing nudes and semi-nudes](#)

## **YOUNG CARERS**

In many families, children contribute to family care and well-being as a part of normal family life. A young carer is a child who is responsible for caring on a regular basis for a relative (usually a parent, grandparent, sometimes a sibling or very occasionally a friend) who has an illness or disability.

Many young carers may experience:

- social isolation;
- a low level of school attendance;

- some educational difficulties;
- impaired development of their identity and potential;
- low self-esteem;
- emotional and physical neglect;
- conflict between loyalty to their family and their wish to have their own needs met.

Where a young carer is identified, the child's needs will be considered, using the Common Assessment Framework.

## **CHILDREN MISSING EDUCATION**

Ensuring admission and attendance registers are up to date and knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and in older children may raise concerns around child sexual exploitation. The School will ensure compliance with the Local Authority Policy and procedures for Children Missing Education to safeguard these children.

Children who are absent from education or missing/absconding during the school day can also be a sign of a range of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation.

The Designated Safeguarding Lead will monitor unauthorised absence and follow procedures, particularly where children go missing on repeated occasions.

The school will maintain both admission and attendance registers that are accurate and up to date, including all children.

The School will ensure there are procedures to inform the Local Authority when:

- children fail to attend on the agreed or notified first date of attendance at school;
- children fail to attend school regularly or have been absent without the school's permission for a continuous period of ten school days or more;
- children are added to the school role;
- a child's name is to be deleted from the admission register on any of the 15 grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, including for the following reasons:
  - the School has been replaced by another school on an attendance order
  - the school attendance order is revoked by the Local Authority
  - a child is no longer compulsory school age
  - a child is being permanently excluded
  - the death of a child
  - the child is transferred between schools
  - the child is withdrawn to be educated outside of the school system

- the child fails to return from an extended family holiday after both the school and the Local Authority have tried to locate the child
- a medical condition prevents the child attending and returning to school before ending compulsory school age
- the child is in custody for more than four months
- the child has left the school
- there are 20 school-days continuous absence without good reason
- a child was admitted to the nursery and does not transfer into reception

Deletion from the register is a shared responsibility between the school and the LA. The school must consult the Local Authority prior to deletion from roll and must make reasonable steps to find the child if they are not attending. When sharing off rolling information with the LA the school will follow the LA policy.

The school will ensure that all staff understand what to do when a child does not attend school regularly, know the signs and triggers for travelling to conflict zones, FGM, forced marriage and domestic servitude and inform the Local Authority of any child who fails to attend school regularly or does not attend for 10 consecutive days without authorisation.

### **ALTERNATIVE PROVISION**

Alternative Provision is education arranged by local authorities for children who, because of exclusion, illness or other reasons, would not otherwise receive suitable education. Education arranged by schools for pupils on a fixed period exclusion; and pupils being directed by schools to off-site provision to improve their behaviour.

The BeDifferent Federation will ensure that for every child attending alternative provision, we will check that all safeguarding policies and procedures are in place, that all staff have been recruited according to 'Safer recruitment' procedures and have undergone safeguarding training. We will visit the setting to ensure all the above are in place.

### **ELECTIVE HOME EDUCATION**

Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will work together with key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

### **POSSIBLE SIGNIFICANT HARM**

All staff and volunteers should be aware of the signs of abuse, neglect and specific safeguarding issues that are rarely standalone events that can be

covered by one definition or label. In most cases multiple issues will overlap with one another. Types of abuse and their symptoms are described in Appendix 1.

All staff and volunteers should be concerned if a child presents with indicators of possible significant harm, noting in particular that a child in an abusive relationship may:

- appear frightened of the parents and/or other household members including siblings or others outside of the home;
- act in a way that is inappropriate to their age and development (taking into account different patterns of development and different ethnic groups);
- display insufficient sense of 'boundaries' or a lack of stranger awareness; or
- appear wary of adults and display 'frozen watchfulness.

## **PARENTAL INVOLVEMENT**

It is important that parents/carers understand the school responsibility to:

- safeguard and promote the welfare of children
- share information and work in partnership with other agencies when there are concerns about a child's welfare.

In general, the staff will seek to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement to making referral to children's social care. However, this should only be done where it will not place a child at increased risk of significant harm.

The school is committed to working positively, openly and in partnership with parents and carers and will support parents and carers to understand our legal duty to safeguard and promote the welfare of children in our school. This includes our duty to make referrals to Children's Social Care and to assist our colleagues in other agencies with child protection enquiries.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding the:

- full names and contact details of all adults with whom the child normally lives and the child's relationship to the adults with whom he/she lives;
- full names and contact details of all persons with parental responsibility (if different from above);
- emergency contact details (if different from above) and, where possible, more than one contact number; and
- full details of any other adult authorised by the parent to collect the child from school (if different from above).

## **HEALTH (INCLUDING MENTAL HEALTH)**



The BeDifferent Federation has an important role to play in supporting the mental health and wellbeing of our children. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Although it is only appropriately trained professionals who can diagnose mental health problems, staff observe children day-to-day and identify those whose behaviour suggests that they may be experiencing mental health problems or be at risk of developing one.

Where children have suffered abuse and neglect and other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking with one of the school's DSLs. We have access to a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. We have access to [Mental Health and Behaviour in Schools Guidance](#)

Any child with a significant health condition requiring regular medication or treatment will require an Individual Health Care Plan which will be completed with the parent and school nurse. It is vital that parents inform us if their child has a health condition of this nature to enable us to ensure that their child's health needs are managed appropriately whilst they are at school. Information from this plan will be shared with key staff members to ensure that they are alert to the child's individual needs.

## **RELATED POLICIES**

The following policies fall under our safeguarding umbrella and we actively use them to underpin our values, ethos and our intent to ensure that all children at our schools are appropriately safeguarded:

- Staff Code of Conduct
- Behaviour for Learning
- Safer Recruitment
- Whistle-blowing
- Attendance
- E-Safety
- Meeting the needs of pupils with medical conditions
- First Aid
- Educational Visits
- Managing children who are missing in education
- Health and Safety

## **Appendix 1 – Types of abuse and their symptoms**

### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Physical Abuse - Indicators	
Physical Indicators in the child	Behavioural Indicators in the child
<ul style="list-style-type: none"> <li>• Unexplained injuries – bruises / abrasions / lacerations</li> <li>• The account of the accident may be vague or may vary from one telling to another</li> <li>• Unexplained burns</li> <li>• Regular occurrence of unexplained injuries</li> <li>• Bite marks</li> </ul> <p>Most accidental injuries occur on parts of the body where the skin passes over a bony protrusion.</p>	<ul style="list-style-type: none"> <li>• Withdrawn or aggressive behavioural extremes</li> <li>• Uncomfortable with physical contact</li> <li>• Seems afraid to go home</li> <li>• Complains of soreness or moves uncomfortably</li> <li>• Wears clothing inappropriate for the weather, in order to cover body</li> <li>• The interaction between the child and its carer</li> <li>• Admission of punishment which appears excessive</li> <li>• Frequently absent from school</li> </ul>
Indicators in the parents	Indicators in family/environment
<ul style="list-style-type: none"> <li>• Parent with injuries that may suggest domestic violence</li> <li>• Not seeking medical help/delay in seeking medical help</li> <li>• Evasive or aggressive</li> <li>• Reluctance/refusal to discuss injuries</li> <li>• Inconsistent explanation</li> <li>• Disinterested or undisturbed by incident or injury</li> </ul>	<ul style="list-style-type: none"> <li>• Marginalised or isolated by the community</li> <li>• History of mental health, alcohol or drug or alcohol misuse or domestic violence</li> <li>• History of unexplained death, illness or multiple surgery in parents/siblings</li> <li>• Past history of childhood abuse, self-harm or false allegations of physical or sexual assault</li> </ul>

## Neglect

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

Neglect may involve a parent failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

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

Neglect - Indicators	
Physical Indicators in the child	Behavioural Indicators in the child
<ul style="list-style-type: none"> <li>▪ Unattended medical need</li> <li>▪ Underweight or obesity</li> <li>▪ Recurrent infection</li> <li>▪ Unkempt dirty appearance</li> <li>▪ Smelly</li> <li>▪ Inadequate / unwashed clothes</li> <li>▪ Consistent lack of supervision</li> <li>▪ Consistent hunger</li> <li>▪ Inappropriately dressed</li> <li>▪ Complaining of being tired all the time</li> </ul>	<ul style="list-style-type: none"> <li>▪ Poor social relationships</li> <li>▪ Indiscriminate friendliness</li> <li>▪ Poor concentration</li> <li>▪ Low self-esteem</li> <li>▪ Regularly displays fatigue or lethargic</li> <li>▪ Frequently falls asleep in class</li> <li>▪ Frequent unexplained absences</li> <li>▪ Emotionally needy, compulsive stealing, disturbed peer relationships</li> <li>▪ Attachment disorders and absence of normal social responsiveness</li> <li>▪ Mentioning being left alone or unsupervised</li> <li>▪</li> </ul>
Indicators in the Parent	Indicators in the family/environment
<ul style="list-style-type: none"> <li>▪ Dirty, unkempt presentation, inadequately clothed</li> <li>▪ Inadequate social skills</li> <li>▪ Abnormal attachment to the child e.g. overly anxious</li> <li>▪ Low self-esteem and lack of confidence</li> <li>▪ Failure to meet the basic essential needs</li> <li>▪ Failure to meet the child's health and medical needs</li> <li>▪ Child left with adults who are intoxicated or violent</li> <li>▪ Child left alone for excessive periods of time</li> </ul>	<ul style="list-style-type: none"> <li>▪ History of neglect in the family</li> <li>▪ Family marginalised or isolated by the community</li> <li>▪ Past history of self-harm, childhood abuse</li> <li>▪ Dangerous or hazardous home environment</li> <li>▪ Poor state of home environment</li> <li>▪ Lack of opportunities for child to play and learn</li> </ul>

## Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child’s emotional development, and may involve:

- conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- exploiting and corrupting children.

Emotional Abuse - Indicators	
Physical Indicators in the child	Behavioural Indicators in the child
<ul style="list-style-type: none"> <li>▪ Poor attachment relationship</li> <li>▪ Unresponsive / neglectful behaviour towards the child’s emotional needs</li> <li>▪ Persistent negative comments about the child.</li> <li>▪ Inappropriate or inconsistent expectations</li> <li>▪ Self-harm</li> <li>▪</li> </ul>	<ul style="list-style-type: none"> <li>▪ Low self-esteem</li> <li>▪ Unhappiness, anxiety</li> <li>▪ Withdrawn, insecure</li> <li>▪ Attention seeking</li> <li>▪ Passive or aggressive behavioural Extremes</li> <li>▪ Over-reaction to mistakes, inappropriate emotional responses to painful situations, fear of parents being contacted</li> <li>▪ Chronic running away</li> <li>▪ Social isolation</li> <li>▪ Frozen watchfulness</li> <li>▪ Rocking, hair twisting, thumb sucking (neurotic behaviours)</li> </ul>
Indicators in the parent	Indicators in the family/environment
<ul style="list-style-type: none"> <li>▪ Mental health, drug or alcohol difficulties</li> <li>▪ Cold or unresponsive to the child’s needs</li> <li>▪ Imposes inappropriate expectations on the child e.g. prevents the child’s developmental exploration through overprotection</li> <li>▪ Overly critical of the child</li> <li>▪ Never allowing anyone to take care of the child</li> </ul>	<ul style="list-style-type: none"> <li>▪ Lack of support from family or social network</li> <li>▪ Marginalised or isolated by the community</li> <li>▪ Past history of childhood abuse, self-harm or false allegations of abuse</li> </ul>

## Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Sexual abuse includes non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Sexual Abuse - Indicators	
Physical Indicators in the child	Behavioural Indicators in the child
<ul style="list-style-type: none"> <li>• Sign of blood/discharge on the child's clothing</li> <li>• Awkwardness in walking/sitting</li> <li>• Pain or itching – genital area</li> <li>• Bruising, scratching, bites on the inner thighs/external genitalia</li> <li>• Self-harm</li> <li>• Eating disorders</li> <li>• Enuresis/encopresis</li> <li>• Sudden weight loss or gain</li> </ul>	<ul style="list-style-type: none"> <li>• Sexually proactive behaviour or knowledge that is incompatible with the child's age and understanding</li> <li>• Drawings and or written work that is sexually explicit</li> <li>• Self-harm/suicide attempts</li> <li>• Running away</li> <li>• Substance abuse</li> <li>• Significant devaluing of self</li> <li>• Loss of concentration</li> <li>• Reluctance to change for PE</li> <li>• Wetting or other regressive behaviours e.g. thumb sucking</li> </ul>
Indicators in the parent	Indicators in family/environment
<ul style="list-style-type: none"> <li>• Comments made by the parent/carer about the child</li> <li>• Lack of sexual boundaries</li> <li>• Grooming behaviour</li> <li>• Parent is a sex offender</li> </ul>	<ul style="list-style-type: none"> <li>• Marginalised or isolated by the community</li> <li>• Past history of childhood abuse, self-harm or false allegations of abuse</li> <li>• History of mental health, alcohol or drug misuse or domestic violence</li> <li>• Family member is a sex offender</li> </ul>

## **Appendix 2** – Handling disclosures of abuse

Always stop and listen to someone who wants to tell you about incidents or suspicions of abuse, without displaying shock and disbelief.

Take the child seriously. Always assume that he/she is telling the truth.

Do not promise confidentiality; you have a duty to refer to the Designated Senior Person for child protection if 'child in need'.

Do reassure and alleviate guilt.

For example you could say; "you are not to blame."

You have done the right thing to tell someone."

Do not ask leading questions:

For example, "What did she do next?" (this assumes that she did), or "did he touch your private part". The child may well have to tell the story again, and to do so repeatedly will cause undue stress.

In cases where criminal proceedings occur, such questioning can cause evidence to become invalid.

Do not ask the child to repeat the incident for another member of staff.

End by summarising what has been said and what action has been agreed.

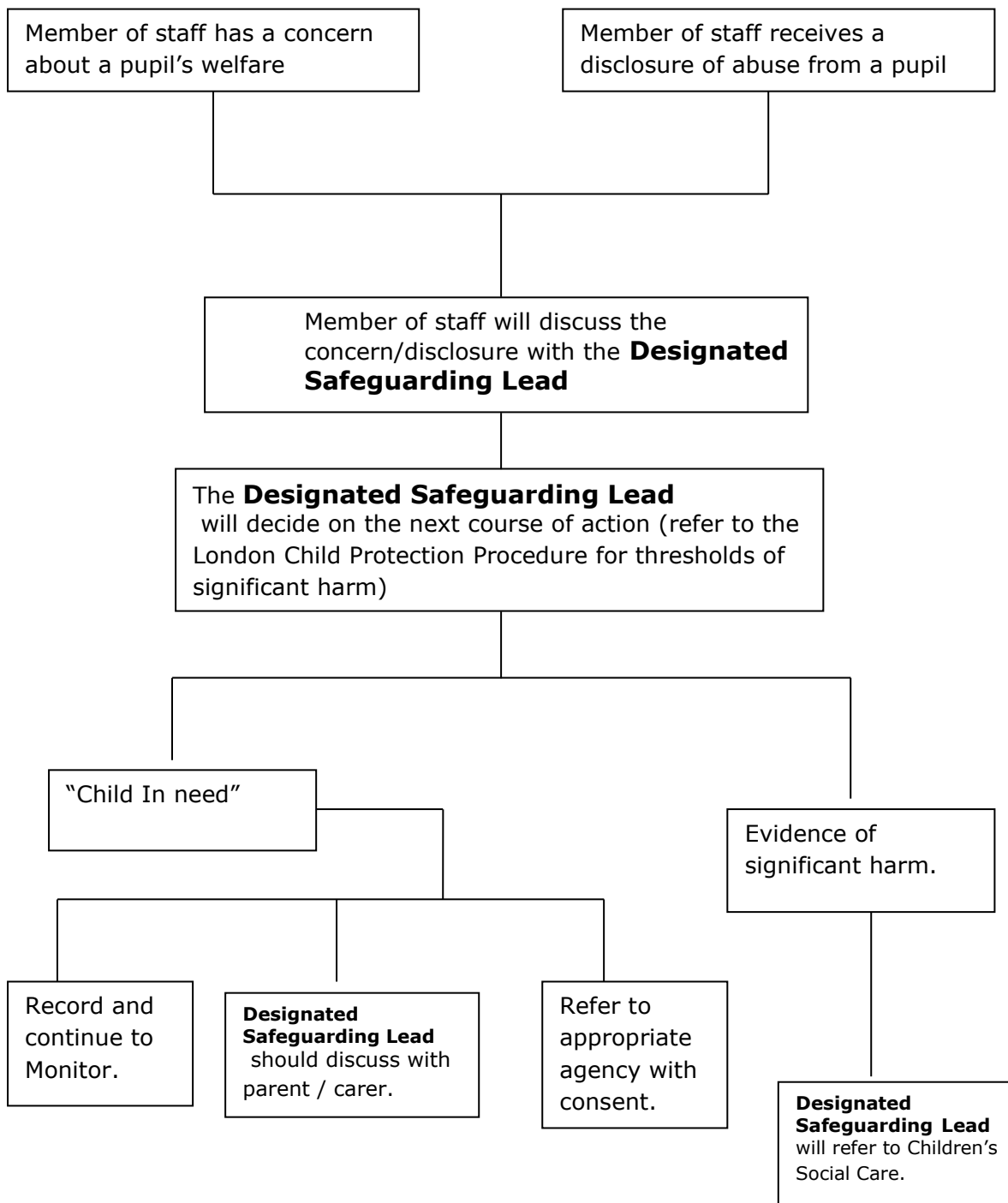
Be clear about what you intend to do next.

Record carefully what has been said on the Child Protection incident forms and what actions have been agreed.

Discuss your concern/disclosure with the Designated Child Protection Person at the school.

**Appendix 3** – Procedures to be followed if you have a concern about a child’s welfare

**Anybody can make a referral**



#### **Appendix 4 – Assessment of Risk (Sexually active children)**

In order to determine whether a relationship presents a risk of harm to a child, the following indicators should be considered:

- whether the child is competent to understand, and consent to, the sexual activity they are involved in (children under 13 are not legally capable of consenting to sexual activity)
- what the child/ren in the relationship's living circumstances are, whether they are attending school, whether they or their siblings are receiving services from LA children's social care or another social care agency etc
- the nature of the relationship between those involved, particularly if there are age or power imbalances
- whether overt aggression, coercion or bribery was or is involved, including misuse of alcohol or other substances
- whether the child's own behaviour (e.g. through misuse of alcohol or other substances) places them in a position where they are unable to make an informed choice about the activity
- any attempts to secure secrecy by the sexual partner beyond what would be considered usual in a teenage relationship
- whether methods used to secure a child's compliance, trust and/or secrecy by the sexual partner are consistent with grooming for sexual exploitation. Grooming is likely to involve efforts by a sexual predator (usually older than the child) to befriend a child by indulging or coercing them with gifts/treats (i.e. money or drugs), developing a trusting relationship with the child's family, developing a relationship with the child through the internet etc in order to abuse the child
- whether the child denies, minimises or accepts the concerns held by professionals.



**Common Assessment Shared Framework can only be completed with the consent and involvement of the parent/carer (or child/young person where appropriate).**

It provides a standard method of assessment used across all children's services. It facilitates **early identification of needs**, leading to co-ordinated provision of services, involving a lead professional where appropriate, and sharing information to avoid the duplication of assessments.

**NB. Child protection concerns should be referred to MASH**

If a CASA has previously been completed it will be helpful to pass on the information already gathered, but do not wait to complete a CASA.

The common assessment is designed for when:

- there are concerns about how well a child is progressing in terms of their health, welfare, behaviour, progress in learning or any other aspect of their well-being;
- there is signed consent from a parent/carer;
- the child's needs are unclear or broader than a single service can address.

A common assessment should be completed when a professional in any agency (all health, childcare, Early Years' settings, schools, education, Connexions, adult social care, crime reduction and the voluntary sector) has concerns that a child will not progress towards the five *Every Child Matters* priority outcomes (being healthy, staying safe, enjoying and achieving, making a positive contribution and achieving economic well-being), without additional services.

Completing a common assessment should:

- enable the professional to identify the child's needs;
- provide a structure for systematic gathering and recording of information;
- record evidence of concerns and a base-line for measuring progress in addressing them;
- provide an evidence base for a decision to refer to another agency if necessary, or to children's social care for an initial or core assessment or to another service for a specialist assessment.

## Appendix 6 – Sexting Guidance

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 as amended in the Sexual Offences Act 2003.

Children under 13 are given extra protection from sexual abuse under the Sexual Offences Act 2003. This law makes it clear that sexual activity with a child under 13 is never acceptable, and that children of this age can never legally give consent to engage in sexual activities.

Designated Safeguarding Leads must ensure they are familiar with and following policies for recognising and responding to harmful behaviours and/or underage sexual activity when dealing with children under 13 who may have been involved in creating or sharing youth produced (including young people sharing images that they, or another person, has created) sexual imagery. This is essential to ensure that children involved or identified are safeguarded and are not unnecessarily criminalised or labelled.

When an incident involving youth produced sexual imagery comes to the attention of the School:

- the incident must be referred to the Designated Safeguarding Lead as soon as possible
- the Designated Safeguarding Lead should have an initial meeting with appropriate staff
- there should be subsequent interviews with the young people involved (if appropriate)
- parents should be informed at an early stage and involved in the process unless there is a good reason to believe that involving the parents would put the young person at risk of harm
- at any point in the process if there is a concern the young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the police immediately

Schools should consider what specific learning might be provided in the curriculum about youth produced sexual imagery and inclusion of information in the school E-Safety Policy.

## **ANNEX A-RESPONDING TO LOCKDOWN PROCEDURES AND REMOTE LEARNING IF REQUIRED**

This additional policy should be read alongside the BeDifferent Federation's Safeguarding Policy and the Department of Education guidance when issued to all schools.

The school will remain open for Vulnerable Children from Reception-Year 6 and whose parents are 'key workers'.

Vulnerable children are defined as who:

- are assessed as being in need under section 17 of the Children Act 1989, including children who have a child in need plan, a child protection plan or who are a looked-after child
- have an education, health and care (EHC) plan and it is determined, following risk assessment (risk assessment guidance), that their needs can be as safely or more safely met in the educational environment
- have been assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued attendance. This might include children and young people on the edge of receiving support from children's social care services, adopted children, those at risk of becoming NEET ('not in employment, education or training'), those living in temporary accommodation, those who are young carers and others at the provider and local authority's discretion.

Merton Council have issued emergency arrangements during lockdown periods. Details of which are:

- The Multi Agency Safeguarding Hub (MASH) will continue to function as normal.
- First Response will continue to run as a Duty Team for incoming work.
- Family Wellbeing Duty will be set up to respond to open and high need families in their service to prevent escalation to social care. The team will also offer parenting guidance and advice via phone support to the families of all children open to Children's Social Care.
- A Central Duty Team will undertake visits for High Risk children.

### **ATTENDANCE**

Vulnerable children's attendance is expected, where it is appropriate for them (that is, where there are no shielding concerns for the child or their household, and/or following a risk assessment for children with an EHC plan), so that they can gain the educational and wellbeing benefits of attending.

Vulnerable children – regardless of year group – that have not been attending in the recent period are expected to return to the school provision where this would now be appropriate for them to do so. Vulnerable Children who have a social

worker are expected to attend unless the child/household is shielding or clinically vulnerable. Vulnerable Children who have an EHCP, attendance is expected where it is determined, following risk assessment, that their needs can be as safely or more safely met in the school or college.

Vulnerable Children who are deemed otherwise vulnerable, at the school, college or local authority discretion, attendance is expected unless the child/household is shielding or clinically vulnerable.

The Headteacher of the Merton Virtual School must be informed in relation to all children who are 'Looked After'.

The BeDifferent Federation will continue to inform social workers where children (with a social worker) do not attend. We will continue to follow up with any parent or carer of a child who is expected to attend and fails to do so.

Schools are expected to report daily attendance figures to the Department for Education by 12 noon every day. Schools are also expected to send vulnerable children information to the Education Welfare Service using the Emergency Attendance Monitoring Group in USO-FX.

### **DESIGNATED SAFEGUARDING LEAD**

A trained DSL (or deputy) will be available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone.

Where a trained DSL (or deputy) is not on site, in addition to the above, a Senior Leader will assume responsibility for co-ordinating safeguarding on site. This might include updating and managing access to child protection online management systems, for example My Concern or CPOMS and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

All school named staff and volunteers will have access to a trained DSL (or deputy). On each day staff on site will be made aware of who that person is and how to contact them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely or may be virtual, for example via Zoom or Skype.

If the DSL is nearing or is over the 2 yearly statutory update, for these emergency provisions, that DSL may continue in their duty.

If a school does not have a DSL due to sickness or staff in isolation, assistance can be sought from a nearby school or cluster group of schools to provide DSL cover.

The DSL will ensure that all CP records relating to a child attending another setting will be communicated and transferred if necessary. It is recommended that both settings discuss any concerns involving a Vulnerable Child. This will include access to CP Plans, EHCPs or Personal Education Plan if the child is 'Looked After'.

## **REPORTING A CONCERN**

All school staff must understand that the majority of children will have been at home during the period of enforced lockdown and the partial return to school will be the first time that they will be in the company of their friends and teachers/school staff. Children will want to talk about their experiences of being at home and in some cases, this may be difficult and stressful. Staff need to be aware that some of these conversations could result in a disclosure of abuse against a parent/ carer or other adult. In addition, it may also include a sibling or other child.

We are aware that during this lockdown period there have been an increase in the reporting of domestic abuse and criminal exploitation of children through county lines.

School staff must be also aware when working with children who have additional needs including SEN and disabilities, or if children have communication issues and be alert as to any drawings or pictures which may indicate that something has happened.

In all cases any drawings or body maps must also be passed to the DSL/ Deputy along with original notes of the disclosure.

If staff do receive an allegation of abuse or harm, then they must follow the procedure detailed in the main Child Protection and Safeguarding Policy. All allegations of abuse or harm must be recorded, signed, dated and timed and passed immediately to the DSL or Deputy DSL.

The phased return of children to the school will enable the DSL and the School Safeguarding Team to have more time to support staff and children with any new safeguarding concerns.

If any member of staff has a concern about an adult working in the school, they must immediately inform the Chief Executive Headteacher. If the concern is about the Chief Executive Headteacher, then the Chair of Governors must be informed.

The Chief Executive Headteacher, on receipt of an allegation against a member of staff, will contact the Local Authority Designated Officer, John Shelley on Tel: 020 8545 3187. Email: [lado@merton.gov.uk](mailto:lado@merton.gov.uk) immediately.

The BeDifferent Federation may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for

the purposes of running activities for children (e.g., Community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, the Federation will follow its safeguarding policies and procedures, including informing the LADO.

### **CHILD ON CHILD ABUSE**

We recognise that during the school closure and phased return a revised process may be required for managing any report of such abuse and supporting victims.

The phased return will bring its own challenges in respect of children mixing with Vulnerable Children and those attending as Key Worker children, whilst at the same time trying to conform to social distancing expectations.

Any reports of child on child abuse must be followed up as set out in Part 5 of Keeping Children Safe in Education 2024 and in the specific section of the Child Protection and Safeguarding Policy.

School staff have received training on child on child abuse in accordance with part 5 of Keeping Children Safe in Education 2024. All reports of incidents must be reported to the DSL, and subsequently the MASH in accordance with the multi-agency safeguarding arrangements.

School staff therefore need to be mindful of any conflicts that may arise or the identification of Vulnerable Children.

### **SAFEGUARDING TRAINING AND INDUCTION**

Any new staff recruited during these emergency procedures will require safeguarding induction in line with Keeping Children Safe in Education 2024 which includes receiving:

- Part 1 of KCSiE 2024 and Annex B
- A copy of the Child Protection and Safeguarding Policy
- A copy of the Staff Code of Conduct/ Staff Behaviour For Learning Policy
- A copy of the School Behaviour For Learning Policy
- The Safeguarding response to Children who are missing education.

The induction will also include a meeting with the Designated Safeguarding Lead to understand his/ her role.

All staff will require to be made aware of safeguarding updates during the emergency period.

### **SAFER RECRUITMENT INCLUDING THE MOVEMENT OF STAFF**

It is essential that all staff and volunteers who work in the school are subject to safer recruitment processes and vetting and this includes ensuring that unsuitable people are not permitted to enter the children's workforce or gain access to children. During this emergency period schools will continue to follow their policies and procedures set out in the Child Protection and Safeguarding Policy and part 3 of Keeping Children Safe in Education 2024.

The Disclosure and Barring Service (DBS) has made changes to its guidance to minimise the need for face to face contact.

We will continue to follow the checking and risk assessment process for volunteers as set out in paragraphs 287 to 289 of KCSIE 2024. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff will be in the school and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the Single Central Record (SCR) up to date as outlined in paragraphs 250 to 254 in KCSIE 2024.

All staff who may be working together in a hub/ cluster will not require to undergo a further DBS check. The SCR for the hub/ cluster lead school must include all new staff who are transferred from other schools.

Any member of teaching staff who is dismissed for serious misconduct will be reported to the Teaching Regulation Agency and any member of staff who is withdrawn from a role involving regulated activity for a safeguarding reason will be referred to the Disclosure and Barring Service.

## **ONLINE SAFETY**

During periods of lockdown children are spending more time online using remote learning, playing games and accessing social media.

We will continue to provide a safe environment for children both on and offline. Children will not be allowed to use personal computers, iPads and Chrome Books without supervision. Schools need to be particularly aware of online learning tools and systems in line with privacy and data protection/ GDPR requirements.

This school has filtering on the IT network to ensure all online content is appropriate to the year group. Children who can access the school IT network remotely will also have the same security and filtering. Children who are using an approved device given to them to use at home during a period of lockdown will also have the same security and filtering settings.

Schools in Merton have access to resources supplied by the London Grid for Learning for children and families to help to keep them safe online.

The Data Protection Officer will be made aware of any new communications platforms. This will likely require a Data Processing Impact Assessment.

### **SUPPORTING CHILDREN NOT IN SCHOOL**

Children will remain at home and through a communication plan staff will continue to contact them regularly.

The contact may involve speaking on the telephone with parents and with children themselves. At all times staff look out for any signs or indications that a child may be at risk and report this immediately to the DSL.

Staff will continue to monitor any remote learning that may involve logging on to online learning or submitting work on time. Any indications that children are not logging on must be followed up.

If the pupil is 'looked after', liaison must be made with the Merton Virtual School.

### **SUPPORTING CHILDREN IN SCHOOL**

The BeDifferent Federation is committed to ensuring the safety and wellbeing of all children and will continue to provide a safe space for all pupils to attend. The Head of School will ensure that appropriate staff are onsite and staff to pupil ratio numbers are appropriate to maximise safety.

We will refer to Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of the spread of Covid-19. We undertake to care for the children of key/ critical workers.

If we have concerns about the impact of staff absence, for example, our DSL or first aiders, we will contact the Local Authority.

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Read and signed: \_\_\_\_\_

Name in capital letters: \_\_\_\_\_

Role in school: \_\_\_\_\_

Date: \_\_\_\_\_