

# **Model Child Protection Policy for Schools 1st September, 2021**

**based on Keeping Children Safe in Education, 2021**

**DfE statutory guidance**

ISCB wishes to acknowledge the work of Kent and Hampshire Local Safeguarding Children's Board (LSCBs) policies in the development of this policy.

**Key Safeguarding Contacts:**

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The Designated Safeguarding Lead (DSL) for child protection is: Theonitsa SERgides

The Deputy Designated Safeguarding Leads are: Gloria Tofi and Andrew Turnock

The Designated Teacher for children looked after/previously looked after (CLA) is: Sarah Marklew

The Designated Manager for Allegations against Staff and Volunteers is: Theonitsa Sergides

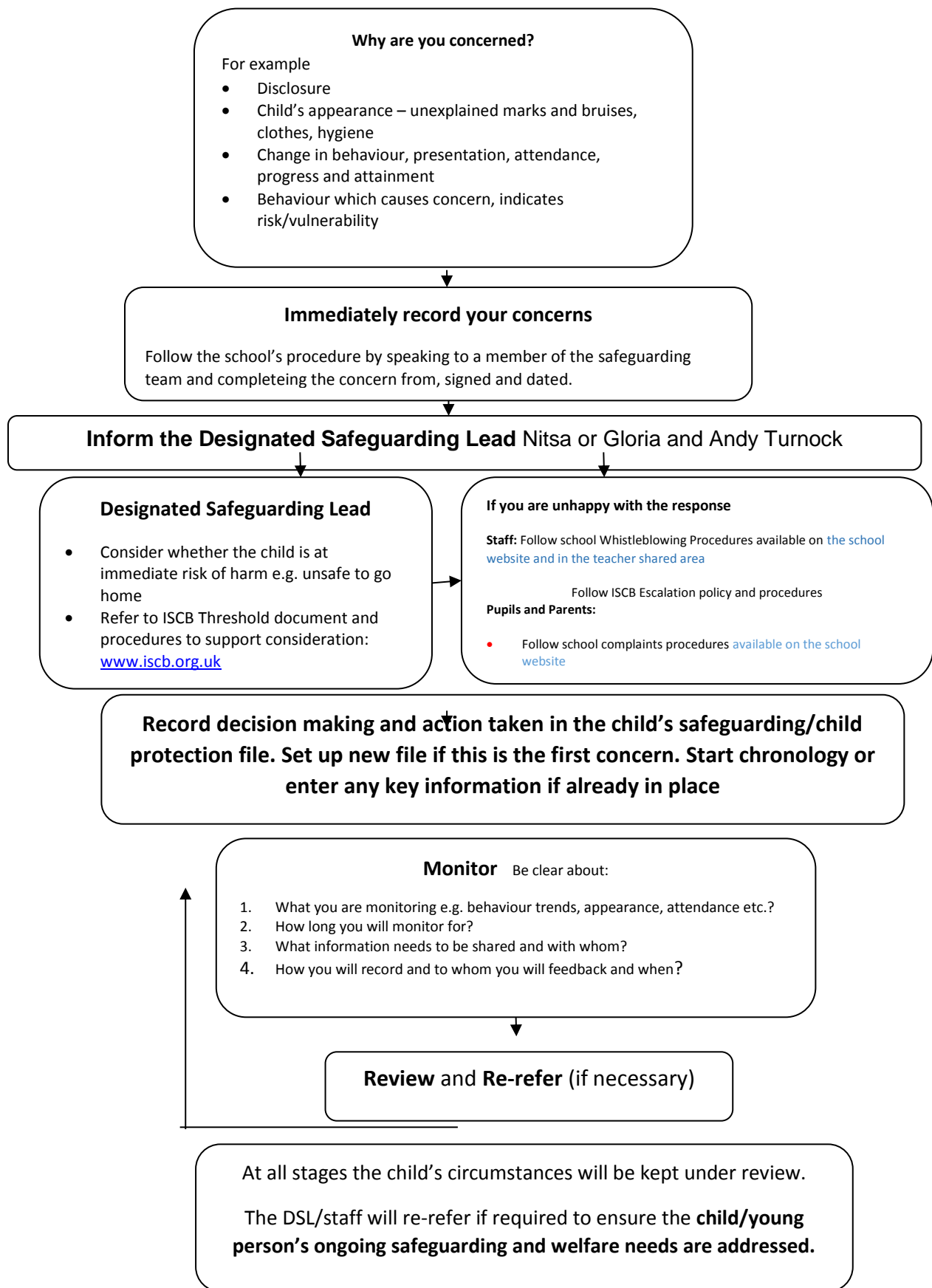
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# Flowchart

## What to do if you have a welfare concern in Grafton Primary School



## 1. Introduction and Ethos

**“Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child”<sup>1</sup>**

- a. Grafton Primary School recognises the importance of creating and maintaining a safeguarding culture that will help all pupils to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are committed to providing an environment where children can play, learn, develop and achieve and where they are safeguarded and are enabled to disclose if they are being harmed in some way. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all pupils receive effective support, protection and justice.
- b. Grafton Primary School recognises that some children may be especially vulnerable to abuse. We understand that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at school, behaviour may be challenging and they may exhibit concerning behaviours and at times this may impact on other children either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all of our pupils.
- c. Our school core safeguarding principles are:
  - That schools are an important part of the wider safeguarding system for children.
  - It is a whole school responsibility to safeguard and promote the welfare of children
  - All children (defined as those up to the age of 18) have equal rights to protection regardless of age, gender, ability, culture, race, language, religion or sexual identity
  - All children have a right to be heard and to have their wishes and feelings taken into account
  - All staff understand safe professional practice and adhere to our code of conduct and other associated policies
  - All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance

Please note that the procedures contained in this policy apply to all staff (including teaching and non-teaching, temporary staff and volunteers) and governors and are consistent with the 6<sup>th</sup> Version, London Child Protection Procedures, 2020.

## 2. Definitions

*“Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil’s welfare, health and safety.”<sup>2</sup>*

Within this document:

- **Safeguarding is defined as:**
  - Protecting children from maltreatment;
  - Preventing impairment of children's mental and physical health or 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 life chances.
- **Child Protection** is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.
- **Staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes governors.
- **Child** refers to all young people who have not yet reached their 18 birthday or Children Looked After and SEND young people who have not yet reached their 25<sup>th</sup> birthday. On the whole, this will apply to pupils of our school; the policy will also extend to visiting children and students from other establishments

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<sup>1</sup> Keeping Children Safe in Education (DfE, 2021)

<sup>2</sup> Inspecting safeguarding in early years, education and skills, Ofsted, September 2019.

- **Parent** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, guardians and foster carers.
- **Abuse** could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the document and appendices 1 and 2.

### 3. Context

- a. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. In addition, Section 175 (Section 157 for academies and independent schools) of the Education Act, 2002 requires governing bodies of maintained schools and further education colleges (including sixth form colleges) to ensure they safeguard and promote the welfare of children who are either pupils at the school or who are students under 18 years of age attending the further education institution.

This includes:

- Working Together to Safeguard Children (DfE 2018) (WTSC) [Working Together to Safeguard Children 2018](#)
  - DfE guidance Keeping Children Safe in Education 2021 (KCSIE) Part One - Safeguarding Information for all Staff and Annex A : [Keeping children safe in education 2021](#)
  - London Safeguarding Children Procedures, March 2021 <http://www.londoncp.co.uk/>
  - [Teaching online safety in schools \(DfE, 2019\)](#)
  - Ofsted guidance 'Inspecting safeguarding in early years, education and skills' (2019) [Ofsted Inspecting Safeguarding](#)
  - [Sexual violence and sexual harassment between children in schools and colleges](#) <sup>3</sup>
  - [Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#)
  - Children and Social Work Act, 2017
  - Early Years and Foundation Stage Framework, 2021 (EYFS) [Statutory framework for the early years foundation stage](#)
  - Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015) [FGM Mandatory Reporting - procedural information nov16 FINAL.pdf](#)
- b. All safeguarding policies will be reviewed on an annual (minimum) basis by the Governing Body which has responsibility for oversight of school safeguarding and child protection systems. The DSL/Head Teacher will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body **will not** receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.
- c. We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies as listed below:
- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>○ Bullying (including cyberbullying) if not included in Behaviour Policy</li> <li>○ Online Safety and Social Media including use of camera's and mobile phones (including children and all adults (staff/volunteers/parents/visitors on site)</li> <li>○ Prevent duty (radicalisation and extremism)</li> <li>○ Children missing from home or care</li> </ul> | <ul style="list-style-type: none"> <li>○ Data Protection (including General Data Protection Regulations (GDPR)) and Information Sharing</li> <li>○ Sex and Relationships Education</li> <li>○ Managing Allegations Against Staff</li> <li>○ Staff Behaviour Policy/Code of Conduct for Staff (including Acceptable Use of Technology)</li> <li>○ Health and Safety including Risk Assessments (e.g. school trips, use of technology) and First Aid and Accidents</li> </ul> |
|--|---|

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<sup>3</sup> From 1 September 2021

- Safer Recruitment
  - Whistle-Blowing
- d. All staff and volunteers at Grafton Primary School recognise that children experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will respond in the same way as they do to protect children from any other risks.
- e. Supporting Guidance (to be read and followed alongside this document)
- Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers [Information Sharing](#)
  - What to do if you're Worried a Child is being Abused:
    - [What to do if you're worried a child is being abused - Publications - GOV.UK](#)
  - Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - Safer Recruitment Consortium, 2019 :
    - <https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>
  - Mental Health & Behaviour in Schools 2018 : [Mental health and behaviour in schools - Publications - GOV.UK](#)
  - Teachers Standards 2012 [Teachers' Standards](#)
  - Safeguarding Disabled Children – Practice Guidance - DOH, 2009  
<https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>
  - Preventing and Tackling Bullying: [Preventing & Tackling Bullying](#)
  - Promoting Children and Young People's Emotional Health & Wellbeing : [Promoting children and young people's emotional wellbeing](#)
  - Rise Above : links to lesson plans and materials <https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>
- f. These documents can be found in the school's teacher shared area under 0 Safeguarding Documents which is available for all staff.

#### 4. Safeguarding and Child Protection Procedures

- Any member of staff, volunteer or visitor to the school who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must report it immediately to the DSL** (or, in their absence, the deputy DSL). See flowchart '[What to do if you are worried about a child/young person](#)' on page 4.
- The DSL or deputy DSL will immediately refer cases of suspected abuse or allegations, by telephone, to the Children's Services Contact Team (CSCT) in Islington on 0207 527 7400 or the local authority where the child lives. For Islington referrals the telephone referral to CSCT will be confirmed in writing [CSCReferrals@islington.gov.uk](mailto:CSCReferrals@islington.gov.uk) within 48 hours. Referrals to other local authority statutory services will be followed up, within the same timescale. All referrals will be made using the local authority's referral process (KCSIE, 2021) See <https://www.gov.uk/report-child-abuse-to-local-council> for local authority child protection referral contact details.
- Wherever possible, the school will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to seek advice from CSCT and/or Police in making decisions about when it is appropriate to share information with parents / carers.
- If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, they should press the DSL for re-consideration of the case in order to reassure themselves the child is safe and their welfare is being considered. If after following this process, the staff member remains concerned that appropriate action is not being taken, it is the responsibility of that person to seek further direct consultation from the head teacher or safeguarding governor.
- If after a referral to CSC a child's situation does not appear to be improving, the DSL will request reconsideration to ensure that the referral concerns have been addressed and, most importantly, that the child's situation has improved.

Professional disagreements (escalation) will be responded to in line with the ISCB procedures and DSLs may request support via the Principal Officer: Safeguarding in Education (POSIE).

- These procedures apply to all staff working/volunteering in the school and will be covered in training to enable everyone understands their role and responsibility. The prime concern at all stages must be the interests and safety of the child. **Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.**
- All staff are aware that children with disabilities, special needs language delay and/or where English is not their first language may communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.
- The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are worried a child is being abused. **Grafton Primary School** adheres to the London Safeguarding Children Procedures (Online, March 2021). The full procedures and additional guidance relating to specific safeguarding issues can be found on the ISCB website [www.islingtonscb.org.uk](http://www.islingtonscb.org.uk)
- When new staff, volunteers or regular visitors join our school they are informed of the safeguarding arrangements in place, the name of the DSL and how to share concerns with them.
- The headteacher will ensure that the policies and procedures adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

## 5. Early Help

- Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
  - Has health conditions including a mental health need
  - is disabled and has specific additional needs;
  - has special educational needs (whether or not they have a statutory education, health and care plan);
  - is a young carer;
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups and county lines
  - Is at risk of child sexual exploitation and/or other extra familial harm
  - is frequently missing/goes missing from care or from home;
  - is misusing drugs or alcohol themselves;
  - Is at risk of modern slavery, trafficking or exploitation;
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
  - has returned home to their family from care;
  - is showing early signs of abuse and/or neglect;
  - is at risk of being radicalised or exploited;
  - is a privately fostered child
  - A family member in prison
  - Is affected by parental offending
  - Is at risk of honour based abuse
  - Is at risk of female genital mutilation
  - Is at risk of forced marriage
  - Is persistently absent from school (including for part of the school day)
- All staff are aware of the Early Help process, and understand their role within it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- If Early Help is assessed to be appropriate, then the DSL will support staff members involved with the family to initiate an Early Help Assessment by requesting services from Bright Start 5-19. The DSL will keep all Early Help cases under constant review and will give consideration to making a child in need or child protection referral if the situation doesn't appear to be improving for the child.



The Governing Body, Headteacher and Leadership Team will ensure that the DSL is properly supported in this role in relation to the availability of appropriate time, support and resources.

## 6. Recognition and Types of Abuse and Neglect

- All staff in school should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1. Staff should also refer to Part 1 and Annex A within KCSIE, 2021 and 'What to do if you are worried a child is being abused' (2015).
  - All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours' may also indicate child abuse or neglect, so staff are alert to parent-child interactions or concerning parental behaviour's; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- By understanding the warning signs, our school can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## 7. Online Safety

*This section should be read in conjunction with the school's on-line policy and any and all relevant acceptable use agreements.*

8. Grafton Primary School recognises that the use of technology presents particular challenges and risks to children and adults both inside and outside of school. The DSL and leadership team have read paragraphs 123-135 regarding Online Safety within KCSIE 2021.
9. Members of staff with appropriate skills, interest and expertise regarding online safety are encouraged to help support the DSL, and deputy DSLs, when developing curriculum approaches or making technical decisions. However, the DSL retains overall responsibility for online safeguarding within the school.
10. Grafton Primary School identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk:
  - content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
  - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
  - commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/> )

11. Grafton Primary School recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2021 and EYFS 2021 (*remove references as appropriate*) has appropriate policies in place that are shared and understood by all members of the school community.
12. The school's approach to online safety will consider the 4 cs above. We have clear rules relating to the use of mobile and smart technology that means pupils are not allowed to access their mobile phones. In doing so we are preventing and deterring the use of mobile phone networks during school time for pupils to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. This approach is also reflected in our online safety/behaviour/anti-bullying policies.
13. Grafton Primary School recognises that online safety is part of the whole school approach to safeguarding which includes:
  - Parental engagement with online safety
  - An appropriate level of security to protect users and their data
  - An annual review of the school's online safety procedures which include a risk assessment that reflects and considers the risks children face online
  - Curriculum planning
  - Teacher training
  - The role and responsibilities of the DSL
14. Further information reading the specific approaches relating to this can be found in the schools Online Safety Policy, Acceptable Use Policies and Image Use Policy which can be found in the shared area and school website.
15. Grafton Primary School will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access school systems and internet provision. The school will be careful to ensure that these systems do not place unreasonable restrictions on internet access or limit what children can be taught with regards to online teaching and safeguarding. Grafton Primary School applies the LgFl filtering and IT Islington monitoring.

Grafton Primary School will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

## 8. Learning at home

Where children are being asked to learn online at home the DfE has provided [Remote education good practice](#). It is essential that children are safeguarded from potentially harmful and inappropriate online material. Staff with access to school devices are reminded about rules on the **misuse of school technology** – devices used at home should be used just like if they were in full view of a teacher or colleague. School staff will:

- not use private accounts
- log all contacts
- log issues and concerns
- considering pupils with SEND
- avoiding private chats with pupils

## 9. Key Responsibilities

All staff including teaching and non-teaching staff, temporary and supply staff, clerical and domestic staff, volunteers and staff working on site employed by other services and agencies and those working with children and families in the community, have a statutory responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with this policy. All staff must have access to this policy and follow the school's procedures and guidance at all times.

### a. The Governing Body

- The Governing Body holds overall responsibility for the child protection and safeguarding functions of Grafton Primary School and will ensure that the school's safeguarding arrangements take into account the procedures and practice of

the local authority as part of the inter-agency safeguarding procedures set up by Islington Safeguarding Children Board (ISCB), including local protocols for assessment and the ISCB's threshold document.

- The governing body and school leadership team are responsible for ensuring the school follows recruitment procedures that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place within the Islington HR safer Recruitment Policy. It ensures that volunteers are appropriately supervised in school.
- Our school has a nominated governor for safeguarding, named on the front of this document. They take the lead role in ensuring that the school has an effective safeguarding and child protection policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding children are reviewed at least annually. The governing body, have read and will follow KCSIE 2021.
- A member of the governing body is nominated to be responsible for liaising with Islington Council's Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against the Headteacher. This name of this governor is the Chair of Governors, Alex Baros Curtis.
- Maintained schools: Governors are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who does not already have one. As governance is not a regulated activity, they do not need a barred list check, unless, in addition to their governance duties, they also engage in regulated activity.
- For those staff engaged in management roles (in independent schools - including academies and free schools) an additional check is required to ensure they are not prohibited under section 128 provisions.<sup>4</sup> This includes governors.
- The Designated Safeguarding Governor is responsible for liaising with the Headteacher and DSL regarding child protection issues. **This is a strategic role rather than operational – they will not be involved in concerns about individual pupils.**
- Whilst the Governing Body holds overall responsibility for the child protection and safeguarding functions of the school, the day to day operational responsibility rests with the Headteacher.

#### **b. Responsibilities of the Headteacher**

The Headteacher is responsible for ensuring that:

- this child protection policy and other relevant policies and procedures, adopted by the Governing Body, are fully implemented and followed by all staff
- sufficient resources and time are available to enable the DSL to carry out their duties and case holding staff are able to take part in strategy discussions/meetings, initial and review child protection conferences, core group and Team around the Child Meetings and other inter-agency meetings which contribute to the assessment of children including writing reports for conferences
- all concerns about poor or unsafe practice regarding children, will be addressed sensitively and in a timely manner in accordance with the school's whistle blowing policy.
- there are robust systems in place to cover for the DSL's planned and unplanned absences from the school, including having Deputy DSLs who have the role added to their job descriptions.

#### **c. Designated Safeguarding Lead and Deputies (DSL)**

- The school has appointed a member of the senior leadership team (**name, role**) as the DSL. The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection systems in school. The school has also identified additional staff to deputise for when the DSL is not available. Any reference to the DSL in this policy refers to the whole DSL team including deputies.

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<sup>4</sup> Section 128 of the Education and Skills Act 2008 provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent school (which includes academies and free schools).

- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by Islington Safeguarding Children Board in line with guidance set out in Competence Still Matters, 2014. The DSL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods via. e-Bulletins, the Safeguarding Newsletter, conferences, local meetings ie DSL Forum, other training at regular intervals, at least annually, to keep up with any developments relevant to their role.
- During term time the DSL (or a deputy) will always be available (during normal school or college hours) for staff in school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in *exceptional circumstances* availability via phone and or video call or other such mediums is acceptable.
- The DSL is the central contact point for all staff to discuss any safeguarding concerns and has lead responsibility for managing child protection referrals, safeguarding training and raising awareness of all child protection policies and procedures. They will ensure that everyone in school (including temporary staff, volunteers and contractors) is aware of this policy and our procedures and that they are followed at all times.
- The DSL maintains a confidential recording system for all safeguarding and child protection concerns and works closely with the Designated Teacher for Looked After Children and the Head of the Virtual School for all children who are looked after or have previously been looked after.
- The DSL ensures that the school provides reports/updates and is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences and Team around the Child Meetings)

d. **Additional responsibilities for the DSL:**

- Responsibility for online safety as well as safeguarding and child protection
- Working with mental health leads where safeguarding is linked to mental health
- Promoting supportive engagement with parents and carers
- Promoting educational outcomes of children in need by knowing and helping to address issues they have/are experiencing by:
  - Ensuring the school knows which children need a social worker, understand their academic progress and attainment and maintaining a culture of high aspirations
  - Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have/had a social worker reach their potential
  - Recognising the lasting impact on educational outcomes
- To work with the headteacher and 'relevant strategic leads' on information sharing:
  - Understanding the importance of sharing information with other schools/colleges on transfers including in-year transfers and between primary and secondary education
  - Ensuring information in child protection files is kept confidential and stored securely
  - Ensuring that the child protection file is transferred to a new school/college within 5 days for an in-year transfer or within first 5 days of start of a new term.
- Training, knowledge and skills new expectations they have a good understanding of:
  - How to identify, understand and respond to specific needs that can increase the vulnerability of children
  - Specific harms that could put children at risk
  - The important role they play in providing information and support to CSC to safeguard and promote their welfare
  - The lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing, and what is needed to respond to this
  - The difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication
  - Children in need (disabled children, those with relevant health needs and young carers) who have specific need to be alert to

e. **Staff and volunteers**

- Due to their day to day contact with children, staff in this school are well placed to observe possible signs of abuse in children. All staff maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. ***It is not the role nor responsibility of those working with children in the school to assess,***

***diagnose or investigate whether a child is at risk of or suffering harm or abuse.*** It is the responsibility of all staff to be aware of the need to report any concerns about a child to the DSL as a matter of priority or, in his/her absence, to the nominated deputy DSL.

- All staff have a responsibility to provide a safe learning environment in which our children can learn. They will ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience, including through curriculum development and planning
- Any child may benefit from early help and all staff members are aware of the local early help process and our role in it. They are aware of signs of abuse and neglect so they are able to identify children who may be in need of help or protection.
- All staff and volunteers take individual responsibility for knowing what to do if a child discloses, or they have concerns about abuse or neglect. Members of staff know how to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child.

**f. Children and Young People**

- Children and young people will:
  - Contribute to the development of school safeguarding and child protection policies
  - Read and follow (at a level appropriate to their age and ability) the schools safeguarding policies and procedures
  - Seek help from a trusted adult if things go wrong and support others who may be experiencing safeguarding concerns
  - Develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online

**g. Parents and Carers**

- Parents/carers have a responsibility to:
  - Discuss safeguarding issues with their children, support the school in their safeguarding approaches, and reinforce appropriate safe behaviours at home
  - Identify changes in behaviour which could indicate that their child is at risk of harm online, or in the wider community.
  - Seek help and support from the school, or other appropriate agencies, if they or their child have any safeguarding concerns
  - Contribute to the development of the schools safeguarding policies
- A statement in the school prospectus will inform parents and carers about our school's duties and responsibilities under child protection and safeguarding procedures. Our safeguarding statement will also be on the school website.
- Parents can obtain a copy of the school Safeguarding and Child Protection Policy and other related policies on request and can view them via the school website

## 10. Mental Health

The school has an important role to play in supporting the mental health and wellbeing of children. Staff have an awareness that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one and work with external agencies

Where children have suffered:

- abuse and neglect, or
- other potentially traumatic adverse childhood experiences

This can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their 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 following the school child protection policy and speaking to the DSL or a deputy.

## 11.Children in Specific Circumstances

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

- Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Once information about a child with a social worker is communicated to the school, the DSL will, as a matter of routine, hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' <https://www.gov.uk/government/publications/review-of-children-in-need/review-of-children-in-need> contains further information; the conclusion of the review, 'Help, protection, education' [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/809236/190614\\_CHILDREN\\_IN\\_NEED\\_PUBLICATION\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809236/190614_CHILDREN_IN_NEED_PUBLICATION_FINAL.pdf) sets out action the Government is taking to support this.

### b. Peer on peer abuse

- Our school may be the only stable, secure and safe element in the lives of children at risk of, or who have suffered harm. Nevertheless, whilst at school, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other children. Our school recognises that some children may abuse their peers and any incidents of peer-on-peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate.
- Peer-on-peer abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse, sexual violence / sexual harassment, 'upskirting', 'sexting' or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our school understands the different gender issues that can be prevalent when dealing with peer-on-peer abuse.

### c. Online Safety and Peer-on-Peer Abuse

School staff are aware that technology is a significant component in many safeguarding and wellbeing issues:

- Children are at risk of online abuse as well as face to face
- Peer-on-peer abuse can happen online through:
- Abusive, harassing and misogynistic messages
- Non-consensual sharing of indecent nude and semi-nude images/videos especially in chat groups
- Sharing of abusive images and pornography, to those who do not want to receive it

Staff should:

- Recognise and respond to the indicators
- Recognise it may be taking place, even if not reported
- Understand their role in preventing and responding where a child is at risk
- Understand the importance of challenging inappropriate behaviours to ensure a safe environment and not to normalise abuse
- Recognise it can take place inside and outside of school and/or online

*Refer to on-line safety policies, acceptable use policies, behaviour and anti-bullying policies.*

**d. Serious violence**

All staff are aware of indicators which may signal that children are at risk from or involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships and/or
- relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm and/or
- a significant change in well-being
- signs of assault
- unexplained injuries
- unexplained gifts or new possessions may indicate involvement with individuals associated with criminal networks or gangs.

**e. Safeguarding Children with Special Educational Needs and Disabilities (SEND)**

- Grafton Primary School acknowledges that children with special educational needs and disabilities and/or certain health conditions can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.
- Our staff are aware of the additional barriers which exist recognising abuse and neglect in this group of children, these include:
  - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
  - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability rather than abuse or neglect, without further exploration;
  - Speech, language and communication needs which may make it difficult to tell others what is happening and managing or reporting these challenges.

To address these additional challenges, staff will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

**f. Children Missing from Education**

- Our school recognises that all children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We are aware that a child going missing from education is a potential indicator of abuse or neglect.
- Our school has a procedure in place for responding to unauthorised absence and responding to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. This may include liaising with Children's Social Care and/or the police. For further information, please see the school's attendance and punctuality policy.

**g. Child Criminal Exploitation (CCE)**

- Grafton Primary School recognises the impact of gangs, county lines, violent crime and exploitation on children and young people. We recognise that our initial response is important and so staff will take any allegation seriously and work in ways that support children and keep them safe.

Staff are aware that CCE can include the following:

- Vehicle crime and threatening/committing serious violence
- Children may become trapped due to threats of violence to them and families
- Children may be coerced or entrapped into debt/carrying weapons
- Children may carry weapons for protection

- Children involved in CCE need to be treated as victims themselves even though they may be committing crimes (particularly older children)
- Girls are at risk of CCE too, even though experiences may be different

#### h. County Lines

Some indicators of county lines are:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Staff are aware of the different forms of extra familial harm including sexual exploitation, criminal exploitation and serious youth violence. Staff are also aware of safeguarding issues that can put children at risk of harm and understand that behaviours linked to issues that put children in danger, such as

- drug taking
- alcohol abuse
- deliberately missing education
- sexting

#### i. Child Sexual Exploitation (CSE)

- All staff at Grafton Primary School have been made aware of the revised definition of CSE, as issued by the Department for Education in February 2017 which is

*"Child Sexual Exploitation is a form of child sexual abuse.*

*It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.*

*The victim may have been sexually exploited even if the sexual activity appears consensual.*

*Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".*

- We understand that a significant number of children who are victims of CSE go missing from home, care and education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns.
- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.



- CSE can occur over time or be a one-off occurrence, and may happen without the child’s immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- Further information about CSE including definitions and indicators is included in Annex B of KCSIE 2021.

Both Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group:

- takes advantage of an imbalance in power (including gender, sexual identity, cognitive ability, physical strength, status and access to economics or other resources) to coerce
- takes advantage to manipulate or deceive a child into sexual or criminal activity
- uses abuse in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or:

- a series of incidents over time
- from opportunistic to complex organised abuse

The abuse:

- can involve force and/or
- enticement-based methods of compliance and
- may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B of KCSIE 2021.

**j. Domestic Abuse**

The current definition of Domestic Abuse from the Domestic Abuse Act 2021 is:

The behaviour of a person towards another person is “domestic abuse” if—

- They are each aged 16 or over and are personally connected to each other ((ie a) they are, or have been, married to each other; (b)they are, or have been, civil partners of each other; (c)they have agreed to marry one another (whether or not the agreement has been terminated); (d)they have entered into a civil partnership agreement (whether or not the agreement has been terminated); (e)they are, or have been, in an intimate personal relationship with each other; (f)they each have, or there has been a time when they each have had, a parental relationship in relation to the same child; (g)they are relatives.
- the behaviour is abusive.

(3)Behaviour is “abusive” if it consists of any of the following—

- a) physical or sexual abuse;
- b) violent or threatening behaviour;
- c) controlling or coercive behaviour;
- d) economic abuse;
- e) psychological, emotional or other abuse;

and it does not matter whether the behaviour consists of a single incident or a course of conduct.

(4)“Economic abuse” means any behaviour that has a substantial adverse effect on one party’s ability to—

- acquire, use or maintain money or other property, or
- obtain goods or services.

(5)For the purposes of this Act A’s behaviour may be behaviour “towards” B despite the fact that it consists of conduct directed at another person (for example, B’s child).

- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

## 12. Prevent and Radicalisation

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- Our school recognises that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation.
- All staff recognise that children exposed to radicalisation and extremism should be protected and safeguarded in the same way as protecting children from other risks and will report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.
- All staff will complete an approved training package which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process. **This could include the NCALT e-Learning [http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html) or Home Office training on Prevent <https://www.elearning.prevent.homeoffice.gov.uk/> .**

## 13. Curriculum and Staying Safe

- Our school recognises our essential role in helping children through PSHE to understand and identify the parameters of what is appropriate child and adult behaviour; what is ‘safe’; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Our school will ensure that children are taught about safeguarding, including online safety as we consider that this is part of providing a broad and balanced curriculum. This may include covering relevant issues in Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which has been compulsory since September 2020.
- **Relationships and Sex Education and Health Education:** <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- **Education for a Connected World framework:** <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- **Our school** will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

- Systems have been established to support the empowerment of children to talk to a range of staff so that pupils at Grafton Primary School will be listened to, heard and their concerns taken seriously and acted upon as appropriate. Specific systems outside of expected day to day classroom interaction and support will include:
  - School/Student Council
  - Worry boxes
  - Buddy and peer-mentoring systems
  - Peer mediation
  - PSHE events
  - Regular feedback questionnaires with groups of children
  - Specific BULLYING POLICY (cross reference here)
  - Kidscape programme
  - Think U Know, Childnet, Digital Literacy Scheme of work etc.

#### **14. Record Keeping**

- Staff will record any welfare concern that they have about a child on the school's safeguarding incident/concern form with a completed body map if injuries have been observed and pass them without delay to the DSL. Records will be completed as soon as possible after the disclosure/incident/event, using the child's words where appropriate, and will be signed and dated by the member of staff concerned
- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL or the deputy DSL in the DSL's absence.
- Safeguarding Incident/Welfare concern forms are kept on the shared area: teacher 0 safeguarding documents and in the Safeguarding Officer's office.
- Safeguarding and child protection records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding and child protection records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover in line with KCSIE, 2021. These will be given to the new DSL and a receipt of delivery will be obtained. Further information can be found in [ISCB Guidelines for Recording, Storing and Transferring Safeguarding and Child Protection Records in Education Settings, September, 2018.](#) The DSL should also transfer any information relating to the Channel Programme.

#### **15. Confidentiality and Information Sharing**

- Grafton Primary School recognises that all matters relating to safeguarding and child protection are confidential. The Headteacher or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.
- All members of staff are aware that whilst they have duties to keep any information about children, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in Appendix 3.

Our school has due regard to the relevant data protection principles, which allow us to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely

manner but 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.

- not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, we will withhold providing the data in compliance with our obligations under the Data Protection Act 2018 and the GDPR.
- If the school is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local schools) then advice will be sought from the POSIE to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.
- DfE Guidance on Information Sharing (July, 2018) provides further detail on the shared area.
- Data Protection Toolkit for Schools: <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

### **16. Inter-agency Working**

- Our school has an important role to play in multi-agency safeguarding arrangements and contributes to multi-agency working in line with WTSC 2018. If named as a relevant agency by the three safeguarding partners that make up the Islington Safeguarding Children Board, the school has a statutory duty to cooperate with published arrangements.
- Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required, and recognise that a crucial part of this may be in supporting the child while these take place.
- Grafton Primary School recognises the importance of inter-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help meetings.
- The School Leadership Team including the DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

### **17. Complaints**

- The school has a Complaints Procedure which is available to parents, pupils/students and members of staff who wish to report concerns. This can be found on the school website.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff policy. This can be found on the school website.

### **18. Staff Induction, Awareness and Training**

- All members of staff have been provided with a copy of part one of KCSIE, 2021 which provides an overview of safeguarding duties and responsibilities. School leaders will read the entire document. All members of staff who work directly with children should at least read Part 1 and must sign to confirm that they have read and understood. There is a condensed version of Part 1 in Annex A of KCSIE 2021 that should be read by certain staff who do not directly work with children in these roles on the school's SCR.

All staff working directly with children:

- Are expected to read at least Part 1 of KCSIE
- Should reassure victims of abuse that they are being taken seriously, they will be supported and kept safe
- Should not give children the impression they are creating a problem or made to feel ashamed for making a report
- Should know the indicators of abuse and neglect for specific safeguarding issues eg child criminal exploitation and child sexual exploitation
- Should be aware that multiple safeguarding issues often overlap with one another
- Should be aware of the risk factors that increase the likelihood of involvement in serious violence

- The DSL will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in the school's internal safeguarding procedures and communication lines. As a minimum, this will include
  - the child protection policy
  - the behaviour policy
  - the staff behaviour policy (sometimes called a code of conduct)
  - the safeguarding response to children who go missing from education; and
- the role of the DSL (including the identity of the DSL and any deputies).
- 
- All staff members (including temporary staff) will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:
  - Recognise potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
  - Respond appropriately to safeguarding issues and take action in line with this policy
  - Record concerns in line with the school policies
  - Refer concerns to the DSL and be able to seek support external to the school if required
- All staff members (including temporary staff) will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to drug taking, alcohol abuse, truancy and peer on peer abuse such as bullying and sexting can put children in danger. The staff training will also include school responsibilities, the school child protection procedures, online safety, safe working practice and external reporting mechanisms.
- All staff members (including temporary staff) will receive regular safeguarding and child protection updates via emails and face to face meetings as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary staff) will also be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy and Acceptable Use Policy (AUP) which is provided and discussed as part of the induction process.
- The school recognises the expertise which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. All staff are therefore able to contribute to and shape safeguarding arrangements and the safeguarding policy through open conversations and opportunities to feedback to and inform policy. Other safeguarding policies, for example the school Code of Conduct and Acceptable Use Policy, are also sent to staff for their feedback before ratification by the Governing Body.
- The DSL will maintain an up to date register of who has received safeguarding and child protection training, including Prevent and will provide an annual update to the Governing Body as part of the annual safeguarding report.
- Although the school has a nominated safeguarding lead for the governing body Esin Evcem all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

### **19. Safe Working Practice**

- All members of staff are required to work within clear guidelines on Safe Working Practice / the school's Code of Conduct.
- Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, staff will avoid placing themselves in a vulnerable position regarding potential allegations.
- There are circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children and young people, such as guiding a child to safety or breaking up a fight. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. 'Reasonable' means using no more force than is needed. Our school works in accordance with statutory and local guidance (on the use of reasonable force) and recognises that where intervention is required, it should always be considered in a safeguarding context.

- Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff should be aware of the school's Behaviour Management and Physical Intervention Policies, and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.
- Our school understands the additional vulnerability of children with special educational needs and disabilities and will ensure positive and proactive behaviour support to reduce the occurrence of risky behaviour and the need to use restraint.
- Full advice and guidance can be found in Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019) which can be found in the teacher shared area, 0 Safeguarding Documents.
- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in the Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings <https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>, the Acceptable Use Policy and the Staff Code of Conduct.

## 20. Staff Supervision and Support

- The Senior Leadership Team (SLT) aim to create a culture and environment where members of staff feel competent and confident to raise concerns and feel supported in their safeguarding role. Any member of staff affected by issues arising from concerns for children's welfare or safety is encouraged to seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures as outlined above. All new staff including newly qualified teachers and support staff will receive induction training and may have a mentor or co-ordinator with whom they can discuss general safeguarding concerns. However, their induction should be clear that safeguarding and child protection concerns should be brought to the DSL's attention, as soon as possible.
- The school will provide appropriate supervision/1:1 support for all members of staff to ensure that:
  - staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - all staff have regular reviews of their own practice to ensure they improve over time.
  - case holding staff have a space to discuss and reflect upon their work and progress with particular children and young people.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union or other similar organisations directly. Further information about a range of supporting organisations can be found in appendix 4.

### For Schools with Early Years and Foundation Stage Provision:

- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.

## 21. Safer Recruitment

As part of the school's safeguarding culture, the school has robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our school.

Any members of staff who are involved in the recruitment and selection process are appropriately trained in safer recruitment, covering the topics contained in Part 3 of KCSIE 2021 at a minimum. In accordance with The School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 we will ensure that at least one of the persons who conducts an interview has completed safer recruitment training recommended by the Islington Safeguarding Children Partnership and should be repeated every three years.

The school will ensure that the safer recruitment process covers paragraphs 192 – 316 of KCSIE 2021 in relation to advertisement, application form, shortlisting, employment history and references, selection, ID, DBS checks etc.

- The Governing Body will ensure that the Senior Leadership Team and at least one member of the Governing Body complete accredited Safer Recruitment Training in line with statutory requirements.
- Grafton Primary School is responsible for ensuring that the school maintains an accurate Single Central Record (SCR). The SCR is a list of all staff (including supply staff), volunteers and governors and meets statutory requirements.
- We expect all staff and volunteers to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

## 22. Allegations Against Members of Staff and Volunteers

Grafton Primary School recognises that it is possible for staff, supply staff and volunteers to pose a risk of harm to children by behaving in a way that might cause them harm. We will take seriously any allegation received and follow the guidance in Part 4, Section 1 of KCSIE 2021.

### (a) Referrals to the Local Authority Designated Officer (LADO)

A referral to the Local Authority Designated Officer (LADO) should be made immediately if a member of staff, volunteer or supply staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (eg where they are involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children, one example being domestic abuse.)

In the event that there are concerns regarding any one or more of the above criteria the following will take place:

- Basic enquiries to establish facts before contacting LADO
- A case manager (usually headteacher) to lead investigation
- The case manager to discuss any concerns about the welfare of other children in the community of member of staff's family with DSL and make risk assessment
- DSL may then make a referral to children's social care

Where a member of staff has acted in a way outside of school that may question their suitability to work with children (transferable risk), a risk assessment should be carried out when appropriate

- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:
  - this should be immediately referred to the headteacher;
  - where there are concerns/allegations about the headteacher, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, this should be reported directly to the LADO..
- Where there is an allegation against an agency or supply member of staff, the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They will be advised to contact their trade union representative if they have one, or a colleague for support.

### (b) Low Level Concerns

- Low level concerns (including allegations) are those that do not meet the harm threshold set out above. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or as a result of vetting checks undertaken. Grafton Primary School will manage and record such concerns and take appropriate action to safeguard children.
- Grafton Primary School as part of our whole school approach to safeguarding, promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers,

volunteers and contractors) are dealt with promptly and appropriately. We believe it is critical to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one KCSIE 2021) are shared responsibly and with the right person, recorded and dealt with appropriately. This is to ensure that problematic or inappropriate behaviour is identified early, the risk of abuse is minimised and that all adults working in the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

- A low level concern means that the behaviour towards a child does not meet the threshold set out at Section 22(a) above (paragraph 338 of KCSIE 2021) 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 may have acted in a way that:
  - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 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.
- ..... School believes it is crucial that any such concerns, including those which do not meet the allegation/harm threshold at 22(a) above, are shared responsibly and with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.
- .....School’s low-level concerns policy is also set out within the staff code of conduct, as per Part 2 of KCSIE 2021.

**(c) What to do if you have a low-level concern**

- Low-level concerns about a member of staff should be reported to the DSL. Where a low-level concern is raised about the DSL, it should be shared with the headteacher.
- The school encourages staff to feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the DSL and/or headteacher, and recorded in accordance with the school’s low-level concern/staff code of conduct policy (as per paras 419 and 421 KCSIE 2021), and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

**(d) Recording low-level concerns**

- All low-level concerns should be recorded in writing by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (as per paragraph 109 KCSIE 2021).
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will either implement disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the school that have enabled the behaviour to occur and where appropriate policies will be reviewed and updated or extra training delivered to minimise the risk of it happening again. The records will be retained at least until the individual leaves the employment of the school, unless there is an ongoing investigation taking place.

- All staff and volunteers are made aware of the school’s Whistle-blowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff and volunteers can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally on 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)



- Grafton Primary School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Human Resources Service.
- a. For specific guidance on how to respond to allegations against staff, please refer to the “Procedures for Managing Allegations Against Staff” and Whistle Blowing Policy which can be found in the shared area **When in doubt – consult the headteacher.**

### 23. The Use of School Premises by Other Organisations

- Where services or activities are provided separately by another body using the school premises, the Head Teacher and Governing Body will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.
- If this assurance is not achieved, then an application to use premises will be refused.

### 24. Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-school community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within here: Visitors will be expected to sign in and out via the office visitors log and to display a visitor’s badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or professional) who threatens school security or causes others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

### 25. Monitoring and Review

- All school staff (including temporary staff and volunteers) will have access to a copy of this policy and will have the opportunity to consider and discuss the contents prior to approval of the Governing Body being formally sought. The policy will also be available to parents/carers.
- This policy has been written in September 2021 to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare which comes into force on 1<sup>st</sup> September 2021.
- The policy forms part of our school development plan and will be reviewed annually.
- All staff should have access to this policy and sign to the effect that they have read and understood its contents.
- The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

## Appendix 1: Categories of Abuse

1. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
2. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be

carried out both on and offline and be perpetrated by men, women and children. All members of staff should read and understand part one of KCSIE, 2021 and staff who have direct contact with pupils should also read annex A.

3. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as peer on peer abuse) is a specific safeguarding issue in education (see KCSIE 2021 paragraph 29).

#### **Signs that may indicate Sexual Abuse**

- Sudden changes in behaviour and school performance
  - Displays of affection which are sexual and age inappropriate
  - Self-harm, self-mutilation or attempts at suicide
  - Alluding to secrets which they cannot reveal
  - Tendency to cling or need constant reassurance
  - Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
  - Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger
  - Unexplained gifts or money
  - Depression and withdrawal
  - Fear of undressing for PE
  - Sexually transmitted disease
  - Fire setting
4. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### **Signs that may indicate physical abuse**

- Bruises and abrasions around the face
  - Damage or injury around the mouth
  - Bi-lateral injuries such as two bruised eyes
  - Bruising to soft area of the face such as the cheeks
  - Fingertip bruising to the front or back of torso
  - Bite marks
  - Burns or scalds (unusual patterns and spread of injuries)
  - Deep contact burns such as cigarette burns
  - Injuries suggesting beatings (strap marks, welts)
  - Covering arms and legs even when hot
  - Aggressive behaviour or severe temper outbursts.
  - Injuries need to be accounted for - inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.
5. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Signs that may indicate emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

6. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Signs that may indicate neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Missing from home, nursery/school/college, medical appointments including frequent lateness
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: Specific Safeguarding Issues

(Also See Annex B of KCSIE 2021)

### (a) Peer-on-Peer Abuse (Allegations of abuse made against other children)

- All members of staff at **Grafton Primary School** recognise that children are capable of abusing their peers. Peer on peer abuse is most likely to include, but may not be limited to:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - abuse in intimate personal relationships between peers;
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
  - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence and could take place inside school, outside school or online)
  - sexual violence and harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
  - 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
  - consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
  - 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; and
  - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element
- **Grafton Primary School** believes that abuse is abuse and it will never be tolerated, dismissed or minimised. Any incidents of peer on peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures, as outlined in Section 6, above and in accordance with ISCB procedures.
- **Grafton Primary School** will take steps to minimise the risk of all forms of peer on peer abuse. We will ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and to ensure that children recognise warning signs and have access to support both within the school and externally (such as Islington Police, ChildLine etc.). Further information can be found in (list relevant policies e.g. PSHE, Citizenship, Sex and Relationships Education, online safety etc.)
- Sharing nudes and semi-nudes or 'Sexting' or 'Youth Produced Sexual Images' will not be tolerated and the school will respond to such cases in line with the UKCCIS guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- 'Upskirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.
- Further information about the school's response to specific allegations of abuse against pupils can be located in (list relevant policies e.g. behaviour, anti-bullying, online safety etc.) Further information in relation to the school's approach to "sexting" can be found in the school Online Safety Policy. (List how to access)
- All staff to maintain a culture of 'it could happen here' and that if inappropriate behaviour is addressed early, this can help prevent abusive/violent behaviour
- Victims of abuse will be distressed, which can affect progress in school. If the alleged perpetrator is at the same school, this can be made worse
  - Girls are more likely to be victims, boys more likely to be perpetrators
  - It could be a group of perpetrators or an individual
  - Part 5 Should be read alongside DfE's [sexual violence and harassment](#)

- Staff should keep in mind that some children have additional barriers to disclosing due to vulnerability, disability, gender, ethnicity and/or sexual orientation
- Staff should reflect back, using the child's language, when hearing a report
- Staff should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact upon memory, so children may not be able to recall all details or timeline of abuse

#### (b) What to do if you have concerns

- Staff should not wait for a child to make a disclosure, they should act on concerns immediately
- Staff may overhear a conversation that suggests a child may have been harmed or behaviour may be an indicator
- If the report includes an online element, staff may confiscate devices for evidence to hand to the Police
- Staff can ask children outright if they have been harmed and what the nature of the harm was

#### (c) Support

- Pupils who have been experienced peer on peer abuse will be supported by:
  - Being offered an immediate opportunity to discuss the experience with a member of staff of their choice
  - Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
- **Grafton Primary School** is aware of and will follow the ISCB procedures <https://www.islingtonscb.org.uk/key-practice-guidance/Pages/Education-and-safeguarding-education.aspx> for supporting children who are at risk of harm as a result of their own behaviour.
- **Pupils who are alleged to have abused other pupils will be helped by:**
  - Discussing what happened, establishing the specific concern and the need for behaviour to change
  - Informing parents/carers to help change the attitude and behaviour of the child
  - Providing appropriate education and support
  - Sanctioning them in line with school behaviour/discipline policy. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed-term and permanent exclusions.

Speaking with police or other local services (such as early help or children's specialist services) as appropriate – see NCPP advice on when to call the Police, paragraph 26 Local Support

#### (c) Next Steps after Initial Report

- The DSL's risk and needs assessment in response to a report of sexual harassment should also consider whether there have been any other victims. The DSL will regularly review the actions taken to respond to reports and
- Regularly review the risk and needs assessment and put active measures in place to safeguard pupils
- Any risk assessment should be informed by any CSC or multi-agency risk assessment

Staff should be aware of the following:

- Be aware of and respond appropriately to all reports and concerns about sexual violence and/or harassment both online and offline, including those happening outside of school
- Balance the victim's wishes against their responsibility to protect other children
- Remember that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Think about other related issues and wider context, including any links to CSE and CCE and take the potential for sexual violence and harassment in intimate personal relationships into consideration
- Keep victim and alleged perpetrator a reasonable distance apart on school premises including at before and after-school activities
- Ensure recording practice is comprehensive and accurate
- The DSL should know what the early help process is and how and where to access support

- The previous restrictions on the use of Police bail have been removed – the Police will now consider what action to take to manage the assessed risk of harm, this could include the use of Police or court bail.

#### (d) Child Sexual Exploitation (CSE)

- All Grafton Primary Schoolstaff at have been made aware of the revised definition of Child Sexual Exploitation, as issued in the Department for Education in February 2017 <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>
- ‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.’
- Grafton Primary Schoolidentifies that CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.
- All staff and volunteers at **Grafton Primary School**recognises that children at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting children from other risks. They are aware that sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexting, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.

#### (c) ‘Honour based’ abuse (HBA)

- Staff and volunteers at **Grafton Primary School**are aware that so called ‘Honour-based’ abuse (HBA) encompasses a range of crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.
- The indicators of HBA and associated factors will be covered with staff within the school safeguarding training. All members of staff are alert to the possibility of a child being at risk of HBA, or already having suffered HBA. All members of staff are aware that all forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will speak with DSL if they are concerned about HBA.

#### (d)Female Genital Mutilation (FGM)

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.
- As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18.
- Our school will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures. Whilst all staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers.
- If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex B of KCSIE, 2021 for further details. See [. Summary of Mandatory FGM reporting duty](#)
- If there are concerns that a girl is going to be cut, the DSL should complete the ISCB FGM Risk Assessment Tool [Islington FGM Risk Assessment](#) to identify the relevant indicators and inform further action.

- The DSL will complete the FGM e-Learning package (<https://www.fgmelearning.co.uk/>).
- The DSL will also ensure that information and training is made available as appropriate to all members of staff. This includes:  
[FGM The Facts](#)
- *If other resources are used by the school, please include them here.*
- All members of staff will follow the school and ISCB procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

#### (e) Forced Marriage

- A **forced marriage** is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and it is a crime.
- Our staff understand how to report concerns where this may be an issue. The school will contact the Forced Marriage Unit for advice or information on 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).
- The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

#### (f) Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet:-

- Cyber-enabled – crimes happen off-line and enabled at scale/speed online or
- Cyber-dependant – where there is
  - Unauthorised access to computers and illegal hacking, eg accessing a school's computer network to look for test paper answers or change grades
  - Denial of service attacks or 'booting' where attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
  - Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
  - Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring to the Cyber Choices programme, a Police programme supported by the Home Office and led by the National Crime Agency.

Cyber Choices aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, '[National Cyber Security Centre - NCSC.GOV.UK](#)

#### (g) Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by

- parents or other family members;
- by people known but not related to the victim (such as neighbours, friends and acquaintances); and
- by strangers.

Other community safety incidents in the vicinity of a school may raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) will give practical advice on how to keep themselves safe. We will provide outdoor-safety lessons run by teachers or by local Police. The lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available here: [Home - Action Against Abduction](#) and [Home - Clever Never Goes](#)

## (h) Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery is linked to human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - [Modern slavery - GOV.UK \(www.gov.uk\)](#)

### Appendix 3: Keeping yourself safe when responding to disclosures

#### 1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously

#### 2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know

#### 3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- Do not ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

#### 4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

#### 5. Remember

- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

#### 6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals



## Appendix 4: Sexual violence and sexual harassment between children

### Peer-on-Peer Abuse – Model Policy.

#### 1. Context

- a. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- b. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- c. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

#### 2. Policy

- a. We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.
- b. We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE 2021
- c. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- d. We will minimise the risk of peer-on-peer abuse by: -

##### i. Prevention:

- Taking a whole school approach to safeguarding & child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence based content delivered through the curriculum.
- Engaging with specialist support and interventions.
  
- Using a clear reporting system for staff and pupils, that is well promoted, easily understood and accessible
- Recognising that it may be taking place, even if not reported
- Publicising the school's zero-tolerance approach to abuse
- Online safety, including mobile phone usage during school hours

##### ii. Responding to reports of sexual violence and sexual harassment:

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the [Searching, screening and confiscation advice for schools](#) Staff taking a report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.
- Staff taking a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care.

##### iii. Risk Assessment: -

- Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.
- Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

**iv. DSL considerations and response**

- The DSL will consider: -
  - The wishes of the victim.
  - The nature of the incident including whether a crime has been committed and the harm caused.
  - The ages of the children involved.
  - The developmental stages of the children.
  - Whether there is a power imbalance between the children/young people.
  - Any previous incidents.
  - Ongoing risks.
  - Other related issues or wider context.

Options: The DSL will then consider the following options: -

- Manage internally
- Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

**v. Ongoing Response:**

- The DSL will manage each report on a case by case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.
- Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

### **3. Physical Abuse**

- While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.
- These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.
- The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

## Appendix 5: National Support Organisations

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Pupils

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Domestic Abuse

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)

### Honour based Abuse

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- FGM: [Summary of Mandatory FGM reporting duty](#)
- [Islington FGM Risk Assessment](#)

### Sexual Abuse and CSE

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

### Online Safety

- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

## Radicalisation

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## Appendix 6: Local Support

### Islington Children's Services Contact Team

Telephone: 020 7527 7400  
[CSCreferrals@islington.gov.uk](mailto:CSCreferrals@islington.gov.uk)

### Islington LADO

Telephone: 0207 527 8101  
Email: [lado@islington.gov.uk](mailto:lado@islington.gov.uk)

### Islington Police

101 (or 999 if there is an immediate risk of harm)

### NPCC- When to call the police

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf> should help DSLs understand when they should consider calling the police and what to expect when they do

### Islington Safeguarding Children Board (ISCB)

[iscb@Islington.gov.uk](mailto:iscb@Islington.gov.uk)

### Islington Family Information Service

Telephone: 0207 527 5959  
<http://www.islington.gov.uk/fis>

### Islington Family Directory

<http://directory.islington.gov.uk/kb5/islington/directory/service.page>

### Principal Officer Safeguarding in Education

Pupil Services  
Telephone 020 7527 5845/5595  
Alternative number Pupil Services: 020 7527 3747