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APPENDIX A:

**THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD**

**1 MANAGING REFERRALS:**

- 1.1 **REFER** all safeguarding cases, including Early Help, to the **Multi Agency Safeguarding Hub (MASH)** and to the Police if a crime may have been committed.
- 1.2 **IDENTIFY** any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- 1.3 **ACT** as a source of support, advice, and expertise to staff members on matters of child protection and safeguarding, including Contextual Safeguarding.
- 1.4 **ESCALATE** inter-agency concerns and disagreements about a child's wellbeing. All professionals have a duty to act assertively and proactively to ensure that a child's welfare is kept as the paramount consideration in all professional activity to ensure their needs are met appropriately. Please refer to Wandsworth Partnership [Inter-Agency Escalation Policy](#) for further information, this policy aims to resolve professionals' differences in line with the London Safeguarding Children Procedures.
- 1.5 **HAVE RESPONSIBILITY** to ensure there is at least one key adult for 'Operation Encompass' and the point of contact for Child Exploitation. Guiding principles of the scheme and a wealth of resources for schools, including curriculum links, can be found on the [Operation Encompass website](#). An annual information letter should be sent to parents and made available on a schools' website – a template letter can be found on the Operation Encompass Website, [resources for schools'](#) section.
- 1.6 **TO ENSURE** that the Local Authority are notified if children are persistently absent or Missing from Education, see [Children Missing Education – statutory guidance for local authorities](#) and be aware of the contents of [Working Together to Improve School Attendance – September 2022](#).

**2 RECORD KEEPING:**

- 2.1 Keep written (or online) records of Safeguarding and welfare concerns and ensure a stand-alone file is created as necessary for children with safeguarding concerns.
- 2.2 Schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home.
- 2.3 Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions. ([KCSIE 2023 Page 19, paragraph 68-69](#))
- 2.4 Ensure such records are kept confidentially and securely and separate from the child's educational record. Please refer to [Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018](#)

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- 2.5 When a child leaves the school, the Designated Safeguarding Lead should make contact with the Designated Safeguarding Lead at the new school and ensure that the safeguarding file is forwarded to the receiving school as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school or college to have support in place for when the child arrives ([KCSIE 2023 page 32, paragraph 122-123 & Annexe C Page 167](#)). Evidence should be retained to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery. Where a parent elects to remove their child from the school roll to home educate, the school will pass any safeguarding records to the Education Social Welfare Service.

### 3 INTER-AGENCY WORKING AND INFORMATION SHARING:

- 3.1 Co-operate and comply with **Children's Social Care** for enquiries under section 47 of the Children Act 1989.
- 3.2 Advocate that the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe; and this includes allowing practitioners to share information without consent – [Keeping Children Safe in Education 2023 \(Page 30-32, paragraph 115-123.\)](#)
- 3.3 Complete reports and attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.
- 3.4 Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.
- 3.5 The school refers to confidentiality in line with [‘Information sharing: advice for practitioners providing safeguarding services’ \(DfE, 2018\)](#).

### 4 TRAINING:

- 4.1 Undertake appropriate training which provides the knowledge and skills required to carry out the role of the Designated Safeguarding Lead. This training should be updated **at least every two years**. Designated Safeguarding Leads should also ensure that their knowledge and skills are regularly refreshed (at least annually) to allow them to understand and keep up with any developments relevant to their role. This training expectation is also a requirement for any deputy designated safeguarding leads.
- Training should provide designated safeguarding leads with:
- A good understanding of their own role
  - An awareness of how to identify, understand and respond to specific needs that can increase the vulnerability of children.
  - An understanding of specific harms that can put children at risk.
  - An understanding of the processes, procedures, and responsibilities of other agencies, particularly children's social care
- Training should ensure that Designated Safeguarding Leads:
- understand the assessment process for providing early help and statutory intervention.
  - have a working knowledge of how child protection conferences are conducted.
  - understand the role schools play in providing information and support to CSC.

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- understand the lasting impact adversity and trauma can have on children's physical and emotional wellbeing.
- are alert to the specific needs of children in need.
- understand the importance of information sharing.
- are aware of the statutory duties of the Prevent Duty and support staff in the development of this understanding.
- understand the unique risks associated with online safety and have the relevant knowledge to keep children safe whilst they are online at school.
- can recognise the additional risks that SEND children can face online.
- ensure their training is kept up to date and relevant.
- encourage a culture of listening to children which is embedded in the ethos of the school.
- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness.
- understand the assessment process for providing early help and intervention, e.g. Wandsworth Safeguarding Children Partnership thresholds of need, preventative education and the local offer
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these; and
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, racialisation and subject to hearing or listening to [domestic abuse](#).

(See [KCSIE 2023 Training, knowledge and skills – Annexe C Page 168](#))

4.2 Ensure each member of staff has read and understands the school's safeguarding policy and procedures. Child protection and safeguarding training, **which includes an awareness of online safety, and roles and responsibilities in relation to filtering and monitoring** as well as dealing with disclosures and managing an allegation process, should be provided at induction for new staff members.

4.3 All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- Safeguarding /Child Protection policy
- Behaviour policy
- Staff behaviour policy (sometimes called a code of conduct)
- safeguarding response to children who go [missing from education](#); and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Best practice would also see staff and leaders reading the Government guidance: [What to do if you're worried a child is being abused](#) which contains examples of the different types of safeguarding issues.

4.4 Organise whole-school stand-alone Safeguarding training regularly (**including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring**) and ensure that safeguarding is integrated into the whole school or college safeguarding approach and wider staff training and curriculum planning. Training should be regularly updated, and all staff should receive regular safeguarding and child protection updates at least annually (for

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example, via email, e-bulletins, and staff meetings) to provide them with relevant skills and knowledge to safeguard children effectively. Arrangements should be made for members of staff who miss core training, e.g. by joining another school's training.

Link to access safeguarding training via Wandsworth Safeguarding Children Partnership (WSCP) is: [Training - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](https://wscp.org.uk)

Click [here](#) for link to WPDC TPD online.

- 4.5 Ensure the school allocates time and resources every year for relevant staff members to attend training and receive continuous professional development opportunities.
- 4.6 Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.
- 4.7 Maintain accurate records of staff recruitment, induction, ongoing training, and continual professional development (CPD) relating to safeguarding.

### 5. AWARENESS RAISING:

- 5.1 Ensure the school's or college's Child Protection - Safeguarding policies are known, understood, and used appropriately.
- 5.2 Ensure the school's or college's Child Protection - Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- 5.3 Ensure the Child Protection - Safeguarding policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- 5.4 Link with the safeguarding partnership to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.  
(See [Wandsworth Safeguarding Children Partnership Website](#))

### 6 QUALITY ASSURANCE:

- 6.1 Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding and welfare concerns files (at a minimum once a year).
- 6.2 Complete an audit of the school's safeguarding arrangements at frequencies specified and adhere to the Section 175 audit expectations.
- 6.3 Provide regular reports, to the governing body detailing changes and reviews to policy, training undertaken by staff members, key information regarding safeguarding issues, the number of children with child protection plans and other relevant data including safeguarding trends.
- 6.4 Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

## 7 SUPERVISION AND REFLECTION:

- 7.1 Working to ensure children and young people are protected from harm requires sound professional judgements to be made. It is demanding work that can be distressing and stressful. It is therefore essential that staff involved in this work have access to advice and a robust process of reflection/ supervision to help them reflect upon and review their work.
- 7.2 The school will have a framework for providing an opportunity to staff who are working directly with vulnerable young people, particularly those who are being managed on a child protection, child in need or team around the family plan, to have regular access to an appropriate manager to talk through and reflect on their involvement with the child's case.

## APPENDIX B: SAFEGUARDING PROCEDURE

### 1 DEFINITIONS:

- 1.1 **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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online and /or offline, and technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.
- 1.2 **Children** are any people who have not yet reached their 18<sup>th</sup> birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021
- 1.3 **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or significant harm is suggested.
- 1.4 **Early help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.
- 1.5 **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- 1.6 **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm. **Safeguarding and promoting the welfare of children** is defined as:
- protecting children from maltreatment;
  - preventing the impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.

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School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating ([KCSIE 2023](#))

All staff must be aware safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults, harassment and sexting. Staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse; and on how the risk of peer-on-peer abuse is being minimised, how suspected abuse will be recorded and investigated; as well as how the victims and perpetrators will be supported. More support can be found in the government guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) This is non-statutory advice which aims to support designated safeguarding leads (or equivalents) and senior leadership teams in education settings in England in responding effectively to incidents involving the sharing of nudes and semi-nudes. It includes guidance on, risk assessing incidents, safeguarding, and supporting children and young people, handling devices and imagery, recording incidents, including the role of other agencies, and providing education on the sharing of nudes and semi-nudes.

It is important that schools record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it. For more guidance go to [Part 5 of KCSIE 2023](#)

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system.

A bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- 1.7 **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'
- 1.8 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:
- 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;
  - is frequently missing/[goes missing from care, education or from home](#);
  - is at risk of modern slavery, trafficking or exploitation;
  - is at risk of being radicalised or exploited;



- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and [domestic abuse](#);
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is a privately fostered child.

## 2 CATEGORIES OF ABUSE:

2.1 **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate, or valued only in the ways 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
- interactions that are beyond a child's developmental capability
- overprotection and limitation of exploration and learning
- preventing the child from participating in normal social interaction
- seeing or hearing the ill-treatment of another
- 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.

2.2 **Neglect** is the persistent failure to meet a child's basic physical 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 misuse. Once a child is born, it may involve a parent failing to:

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs as well as educational neglect – a parent failing to ensure a child is given an education. For more information on neglect follow this [NSPCC](#) link.

Tackling child neglect is identified as a priority for Wandsworth Safeguarding Children Partnership. The [Wandsworth Multi-agency Neglect Strategy](#) sets out the strategic aims and objectives of our approach to tackling neglect. It should be noted that neglect can take a number of forms, physical, sexual and emotional, and is not always associated with deprivation. It may relate to other safeguarding concerns such as child sexual exploitation and radicalisation, where neglect could be a contributing factor.

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- 2.3 **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.
- 2.4 **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 also 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 is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. (see [KCSIE 2023](#)).

### 3. MENTAL HEALTH:

- 3.1 All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 3.2 Only appropriately trained professionals should attempt 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.
- 3.3 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. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.
- 3.4 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their Child Protection - Safeguarding policy and speaking to the designated safeguarding lead or a deputy.

The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](#) for links to a range of materials and lesson plans.

3.5 **There are three thresholds for the type of referral that needs to be considered:**

**Is this a child with additional needs; where their health, development or achievement may be adversely affected?**

- Age-appropriate progress is not being made and the causes are unclear or
- The support of more than one agency is needed to meet the child or young person's needs.

*If this is a child with additional needs discuss the issues with the Early Help Assessment trained practitioner in your school, the child and parents. You will need to obtain parental consent for an EHA to be completed.*

**Is this a CHILD IN NEED matter? Section 17 of the Children Act 1989 says:**

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority.
- their health or development is likely to be impaired, or further impaired without the provision of such services.
- they are SEND (and as such can face additional safeguarding challenges).

*If this is a child in need, discuss the issues with the Designated Safeguarding Lead and parents. Obtain their consent for referral.*

**Is this a CHILD PROTECTION matter? Section 47 of the Children Act 1989 says:**

- children at risk or who are suffering significant harm.
- children suffering the effects of significant harm.
- serious health problems.

*If this is a child protection matter, this should be discussed with the Designated Safeguarding Lead and will need to be referred to the MASH by the school as soon as possible. [Report a concern about a child - Wandsworth Borough Council](#)*

**More on the thresholds can be found here:**

[Thresholds for intervention - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](https://www.wscp.org.uk)

## APPENDIX C: FURTHER INFORMATION

A full series of '7-minute briefings' have been designed to inform and engage staff in understanding a wide range of safeguarding concerns a wide selection can be located on the website of the [Wirral Safeguarding Children Partnership](#). There are new briefings being added, so to access the full range of briefings click here: [7 minute briefings - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](#)

**1 Female Genital Mutilation** - Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. [Female Genital Mutilation \(FGM\) | Wandsworth Family Information Service](#)

**1.1 Indicators** - There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the government publication [Multi-agency Statutory guidance on Female Genital Mutilation](#). The government has produced a [Female Genital Mutilation resources pack](#) for agencies which is designed to highlight examples from areas where effective practice has been identified and to emphasise what works in protecting survivors and those at risk of female genital mutilation.

**1.2 Actions** - If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

**1.3 Mandatory Reporting Duty**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers, along with social workers and healthcare professionals, to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty commenced in October 2015. Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve the MASH as appropriate.

## **2 Fabricated or Induced Illness / Perplexing Presentation:**

- 2.1 Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:
- fabrication of signs and symptoms. This may include fabrication of past medical history;
  - fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents;
  - induction of illness by a variety of means.
- 2.2 Where this is identified and considered a risk a referral will be made to MASH for support and guidance. School may involve other agencies in making their assessments. That could include school nurse, community paediatrician, occupational therapists for example.

## **3 Gang and Youth / Serious Violence:**

- 3.1 Children and Young People who become involved in Gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with Gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence, and substance misuse.
- 3.2 **Indicators may be (age in brackets):**
- Troublesome (7-9; 10-12) / High daring (10-12) / Positive attitude towards delinquency (10-12) / Previously committed offences (7-9) / Involved in anti-social behaviour (10-12)
  - Substance use (7-9) / Aggression (7-9) / Running away and truancy (7-9; 10-12) / Marijuana use (10-12) / Marijuana availability (10-12) / Disrupted family (7-9; 10-12) / Poor supervision (10-12)
  - Low academic achievement in primary school (10-12) / Learning disability (10-12) / Peers involved in crime and/or anti-social behaviour (7-9; 10-12)
  - Children and young people in the neighbourhood involved in crime and/or anti-social behaviour (10-12)
- See the [Serious Violence Strategy – April 2018](#)
- 3.3 Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- **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)**
- **appear to have unexplained acquisition of money, clothes, or mobile phones**
- **have relationships with and are frequently in the company of controlling / older individuals or groups**
- **receive excessive texts / phone calls and/or having multiple handsets**

## 4 Faith Based Abuse:

- 4.1 Our policy recognises the '[National Action Plan to Tackle Abuse linked to faith or belief](#)' which describes this abuse as:

'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'

- 4.2 When this type of abuse is suspected staff should make a referral referral to the MASH for support and guidance. Further information can be found on Child Abuse Linked to Faith or Abuse (CALFB) through the [Wandsworth Family Information Service](#) and through the [National FGM Centre](#).

## 5 Modern Slavery and Human Trafficking:

- 5.1 The [Modern Slavery Act 2015](#) is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. <https://www.gov.uk/government/collections/modern-slavery-bill> The definition of human trafficking is:

- (a) "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude or the removal of organs.
- (b) The consent of a victim of trafficking in persons to the intended exploitation set forth in subparagraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.
- (c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in sub-paragraph (a) of this article. "Child" shall mean any person under eighteen years of age.

- 5.2 Children trafficked into the country may be registered at a school for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools which are situated near ports of entry, but practitioners should be alert to this possibility in all schools. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from school.

- 5.3 If a member of the school staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority children's social care are contacted immediately. The National Referral Mechanism (NRM) is a framework for identifying and

referring potential victims of modern slavery and ensuring they receive the appropriate support. To access support, please refer to the [National Referral Mechanism guidance](#).

### 6 Risks Associated with Parent/Carer Mental Health:

- 6.1 The majority of Parents who suffer mental ill-health are able to care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. Schools may refer to the SCIE guidance [Think child, think parent, think family: a guide to parental mental health and child welfare](#) and / or guidance on the [NSPCC](#) website in relation to Parental Mental Health.
- 6.2 Our approach is to recognise; seek support; instil preventive factors and monitor. The MASH can provide links and support with Wandsworth Adult Social Care if required. Designated Safeguarding Lead should seek support through Team Around Family (TAF) with family support but escalate to the MASH if they are concerned that the child involved is being placed at immediate risk of harm. The Wandsworth Family Information Service offers a range of [Mental Health Services](#) **[CAMHS and Early Help Resource-and-Information-Pack](#)** and details of the [Early Help services](#) available to children, young people and their families.

### 7 Drugs and Alcohol:

- 7.1 Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they affect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol should be built into the PSHE curriculum at developmentally appropriate levels. We work with our partners and Wandsworth LA to provide curriculum advice and guidance in this area. To access the most up to date information, see Wandsworth Safeguarding Children Partnership - [Drug and Alcohol Guidance for Young People](#), [Drug and Alcohol Guidance for Parents](#), and [Drug and Alcohol Guidance for Professionals](#). The Wirral Safeguarding Children Partnership have also produced a template [School Drug Policy](#) which is a useful resource.

### 8 Honour Based Violence and Forced Marriages:

- 8.1 Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their 'code of honour'. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, Honour Based Violence (HBV) may exist.
- 8.2 A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure. It should be noted that since February 2023 (as outlined within the Marriage and Civil Partnership (minimum Age) Act 2022) the age to marry has been raised to **the age of 18**. It is therefore now a crime to carry out any conduct whose purpose is to cause a child to marry **before their eighteenth birthday, even if violence, threats or another form of coercion are not used**. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages ([KCSIE 2023](#)).



### 8.3 For further information see:

[Government Guidance - Forced Marriage](#)

[The Right to Choose – Government Guidance on Forced Marriage](#)

[The Right to Choose – February 2023](#) (easy read version)

[Karma Nirvana](#) - A specialist Charity for victims and survivors of Honour Based Abuse

[Freedom Charity](#) - A UK-based charity formed to give support to victims of forced marriage and violence upon women thought to have brought dishonour on their family.

## 9 Managing Allegations against staff:

9.1 The Local Authority Designated Officer for Allegations (**LADO**) **must be told of allegations against adults working with children and young people within 24 hours.** Chairs of Governors should refer to this guidance if there is an allegation against the headteacher. This includes all cases that meet the harms threshold where a person is alleged to have:

- behaved in a way that has harmed, 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 they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

9.2 There are two levels of allegation/concern:

1. Allegations that may meet the harms threshold (see definition above)
2. Allegation/concerns that do not meet the harms threshold – referred to in as 'low level concerns' ([KCSIE 2023](#))

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.



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'Low Level Concerns' - Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, being recorded and dealt with appropriately, is critical.

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

**Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.**

- 9.2.1 The Local Authority Designated Officer for Allegations (LADO) in Wandsworth LA is **Anita Gibbons**. Information regarding LADO referrals can be found at LADO (Local Authority Designated Officer) [Wandsworth Family Information Service](#).

If judged appropriate during the initial contact with the LADO, an Allegations Referral Form must be completed by the senior manager in full and forwarded to the LADO via email within 24 hours. The LADO referral form to MASH and the LADO procedures can be found at the above link, an allegation flowchart can be found at the end of this document on Page 28, further information can also be accessed here: [Allegations against staff and volunteers who work with children - Wandsworth Borough Council](#)

The LADO procedure does not replace safeguarding procedures and the MASH must be contacted if you have a safeguarding concern about a child. If you require advice about your agency's response to an allegation, please contact your HR provider.

The LADO can only provide advice and guidance regarding allegations in relation to a person in a position of trust. Any general safeguarding enquiries or concerns should be reported to: **MASH Weekdays 9am – 5pm 020 8871 6622 Out of hours 020 8871 6000**

## 10 Preventing Radicalisation (Prevent and Channel):

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent 'susceptible' people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media have both become major factors in the radicalisation of young

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people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

- 10.1 Prevent** - From 1 July 2015 all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ('The CTSA 2015') Schools must have regard to statutory PREVENT GUIDANCE issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools' responsibility to the need to prevent people from being drawn into terrorism."

This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies
- 

Schools are expected to **assess the risk** of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. **It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.** The Prevent duty builds on **existing local partnership arrangements**. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Partnerships (LSCPs).

**Naheem Bashir** is the [Hate Crime & Prevent Coordinator](#) for Wandsworth -

[naheem.bashir@wandsworthandrichmond.gov.uk](mailto:naheem.bashir@wandsworthandrichmond.gov.uk) , all assessments are to be carried out via MASH and the Referral route via MASH. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#).

The Prevent guidance refers to the importance of Prevent **awareness training** to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. ***As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.*** [Children at risk of radicalisation - WSCP](#)

Schools must ensure that children are safe from terrorist and extremist material when **accessing the internet** in schools. Schools should ensure that suitable monitoring and filtering is in place and regularly reviewed. It is also important that schools teach pupils about online safety more generally ([KCSIE 2023](#)) Further information and guidance is available on the WSCP website: [Prevent counter-terrorism - Wandsworth Borough Council](#)

The Department for Education has also published advice for schools on the Prevent duty which is intended to complement the Prevent guidance and signposts other sources of advice and support. This guidance was updated in October 2022 and includes changes in

structure, to make the information contained more accessible by splitting it into four documents: [The Prevent Duty: Safeguarding Learners vulnerable to radicalisation](#) (October 2022).

Likewise, the [non-statutory Prevent duty self-assessment tool](#) for schools has been updated with formatting, wording and layout changes. The seven main requirements fall under:

- leadership and management,
- risk management,
- working in partnership,
- training,
- online safety,
- safeguarding school premises, and
- building children's resilience to radicalisation

### 10.2 Channel

School staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here: <https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

**11 Child Missing from Education:** All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

11.1 A child going [missing from education](#) is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that 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.

11.2 Schools should put in place appropriate Child Protection - Safeguarding policies, procedures and responses for children who go missing from education, particularly children who are

'absent' from education on repeat occasions or for prolonged periods. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers. An appropriated response is needed when a child has poor attendance or is regularly missing education. See [Children Missing Education guidance - 2016](#)

**11.3 All schools must inform their local authority of any pupil who is going to be deleted from the admission register where they:**

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

**11.4 The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. Schools should contact the Admissions section: Tel: 020 8871 7316**  
This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

**All schools must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).**

## **12 Child Sexual Exploitation & Child Exploitation (CE):**

**12.1 Child Sexual Exploitation (CSE) - CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16-and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on**

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social media). CCE indicators can also be indicators of CSE, as can: • children who have older boyfriends or girlfriends; and • children who suffer from sexually transmitted infections or become pregnant.

The Department for Education has provided guidance for practitioners: [Child Sexual Exploitation](#). Further information can also be found at [Wandsworth Family Information Service – Child Sexual Exploitation](#) and on the [NSPCC](#) website.

- 12.2 **Child Criminal Exploitation:** While there is still no legal definition of ‘Child Criminal Exploitation’ or CCE, it is increasingly being recognised as a major factor behind crime in communities across local authorities, London, and the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled, or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation. Further information in relation to Criminal exploitation and gangs can be found on the [NSPCC](#) website.
- 12.3 County lines is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or ‘deal lines’. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence, and weapons, including knives, corrosives and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults and local communities. Further information about protecting children from county lines can be found on the [NSPCC](#) website.
- 12.4 **Child Sexual Exploitation & Child Criminal Exploitation:** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (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 and range from opportunistic to complex organised abuse. It 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.

Further information, useful links and resources can be found here:

[Wandsworth Safeguarding Children Partnership – Exploitation Resources](#)  
[Child Exploitation and Online Protection Centre \(CEOP\) | Wandsworth Family Information Service](#)  
[The Children’s Society – County Lines and Child Exploitation](#)  
[The Children’s Society County Lines Tool Kit](#)  
[The Children’s Society – Child Sexual Exploitation](#)

### 13 Sexual harassment, violence against women and girls (VAWG), harmful sexual behaviours (inc. child on child abuse and 'upskirting')

- 13.1 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. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.
- 13.2 It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child, sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
- 13.3 Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges can be found in [Part 5 of Keeping Children Safe in Education 2023](#). The charity Brook has produced a [Traffic Light Tool](#) that aims to help professionals identify, understand, and respond appropriately to sexual behaviours in young people, the website also offers a range of information, help and advice.

It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND. We recognise that these children can be targeted by other children, so it is vital a safe space is provided for these children to speak out and share their concerns with members of staff. Pupils must be protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism, and other forms of discrimination. Staff should be familiar with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED), the Human Rights Act 1998 and recent reforms to the Act in [July 2022](#) and how they apply to safeguarding.

Violence against women and girls (VAWG) refers to a range of crimes, with the common theme that they disproportionately affect women and girls. In 2021 the Government published the National [Tackling Violence against Women and Girls Strategy](#) (easy read version: click [here](#)). Schools should be aware of this strategy and develop ways to ensure that work is covered in school to respond to the four priorities, particularly **Priority 1: Prioritising Prevention** and **Priority 4: Strengthening the System**.

- 13.4 Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Schools must record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that



they can understand the scale of the problem in their own schools and make appropriate plans to reduce it. For more guidance, please refer to Part 5 of [KCSIE 2023](#).

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system and, and their wishes and feelings should be considered; the law on child-on-child abuse is there to protect them, not criminalise them.

- 13.5 The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

**Upskirting** - 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales -](#)

#### **Sexual consent**

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;

## 14 Digital Safety, Remote Learning & Filtering and Monitoring:

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

There is a Digital Safety policy, which covers the use of mobile phones, cameras, and other digital recording devices e.g., i-Pads. For online safety, there is within the policy support about children accessing the internet whilst they're at school using data on their phones (3G or 4G networks). The policy reinforces the importance of online safety, including making parents aware of what your school ask children to do online (e.g. sites they need to visit or who they'll be interacting with online). Governing bodies and proprietors are doing all that they reasonably can to limit children's exposure to the risks from the school's or college's IT system

and ensure the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.

For online safety, there is recognition in this guidance that most children are using data on their phones, on the 3G or the 4G network. In schools, this means that not only must staff think about filtering and monitoring within the school's infrastructure, but they also need to have a policy about children accessing the internet whilst they are at school.

### 14.1 Filtering and monitoring

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#). There is on-line safety guidance on the [Wandsworth Safeguarding Children Partnership](#) website designed to help young people, parents and carers, and professionals. to keep their children as safe as possible when online. THE NSPCC offers a wealth of advice on [Keeping Children Safe On-line](#)

All staff should have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and, DSLs as part of their 'lead responsibility' are expected to understand the filtering and monitoring systems and processes in place. Filtering and Monitoring should be part of the full staff CPD programme and governing body/trustees should be supported to understand their role in Filtering and Monitoring. The school should ensure adherence to the [Meeting Digital and Technology standards in schools and colleges](#).

- 14.2 The policy for remote learning should demonstrate an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of their pupils to attend in person. [Providing remote education -guidance for schools](#)



## 15 Pre-Appointment Checks Safer Recruitment & Single Central Record:

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

15.2 When appointing new staff, schools and colleges must:

- Verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website;
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity);
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- schools that work with children between 8 and 18 years old must recognise that the 'relationships and associations' that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school (Childcare Act 2006 – as amended).
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website;
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and verify professional qualifications, as appropriate.
- carry out prohibition check for all staff with QTS
- complete a risk assessment for each volunteer to decide whether they need to do an enhanced DBS check or not. (Please note: even if it is decided an enhanced DBS is to be requested, if the volunteer is not in regulated activity, then you are not legally allowed to do a barred list check).
- Carry out an online search on shortlisted candidates as part of due diligence (and inform them of this prior to any searches) this will help to identify any issues that are publicly available online. The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

15.3 The school or college safer recruitment policy should focus on ensuring potential applicants are given the right messages about the school and college's commitment to recruit suitable people. Further safer recruitment guidance can be found in [Keeping Children Safe in Education \(2023\)](#)

### Single Central Record:

15.4 Schools and colleges must keep a single central record. The single central record must cover the following people:

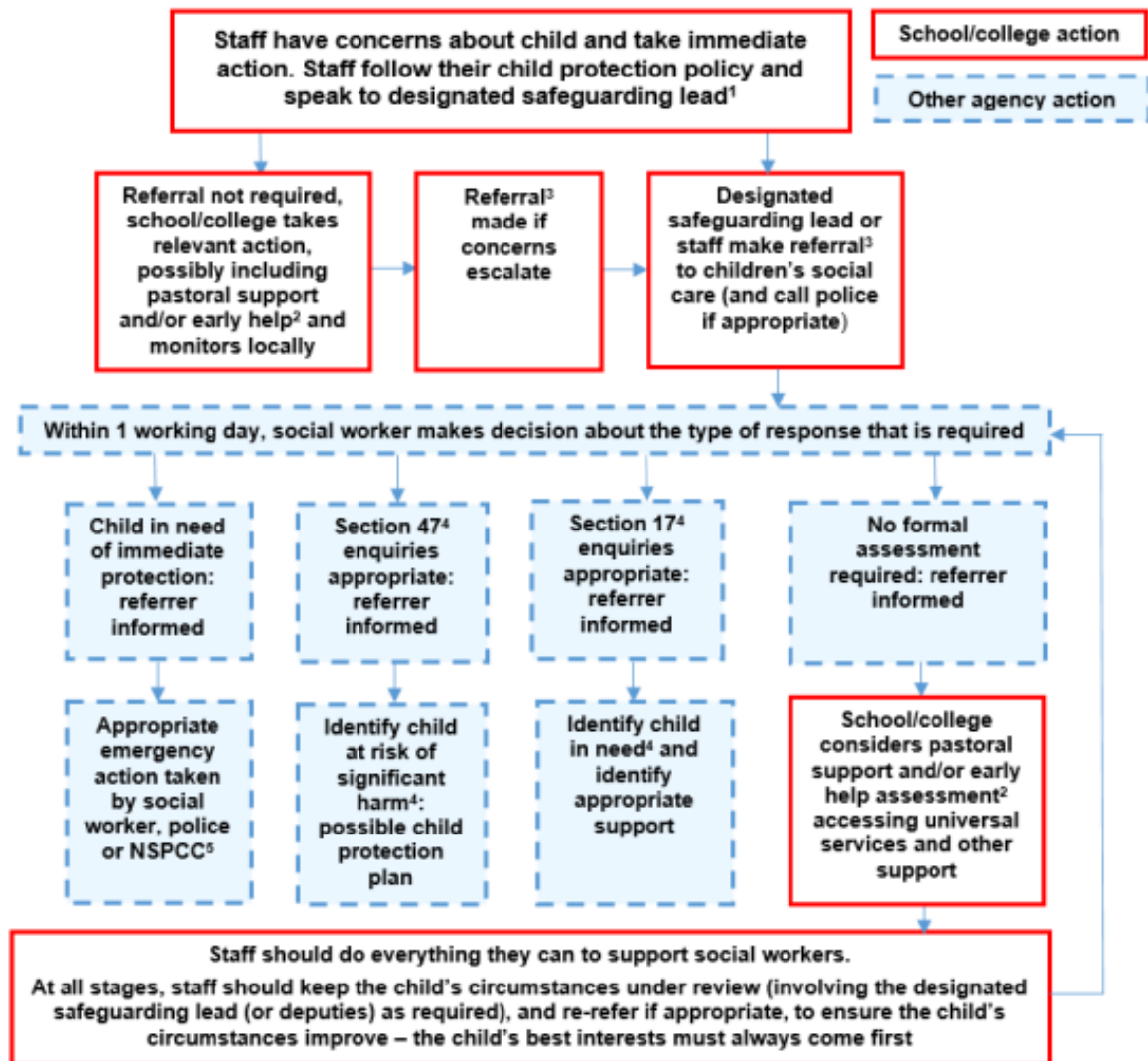
- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school: in colleges, this means those providing education to children; and

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- The information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:
    - an identity check / a barred list check / an enhanced DBS check/certificate / a prohibition from teaching check
    - further checks on people who have lived or worked outside the UK; this would include recording checks for those EEA teacher sanctions and restrictions
    - a check of professional qualifications; and a check to establish the person's right to work in the United Kingdom.
- 15.5 For supply staff, schools should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.
- 15.6 A record of staff leavers must be maintained on the Single Central record.
- 15.7 Maintained school governors - Governors in maintained schools 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. Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.
- 15.8 The SCR shall be updated in the light of any further legislation.

**SAFEGUARDING CONCERNS ABOUT A CHILD (KCSIE 2023 – Part 1 Page 22)**

**Actions where there are concerns about a child**



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

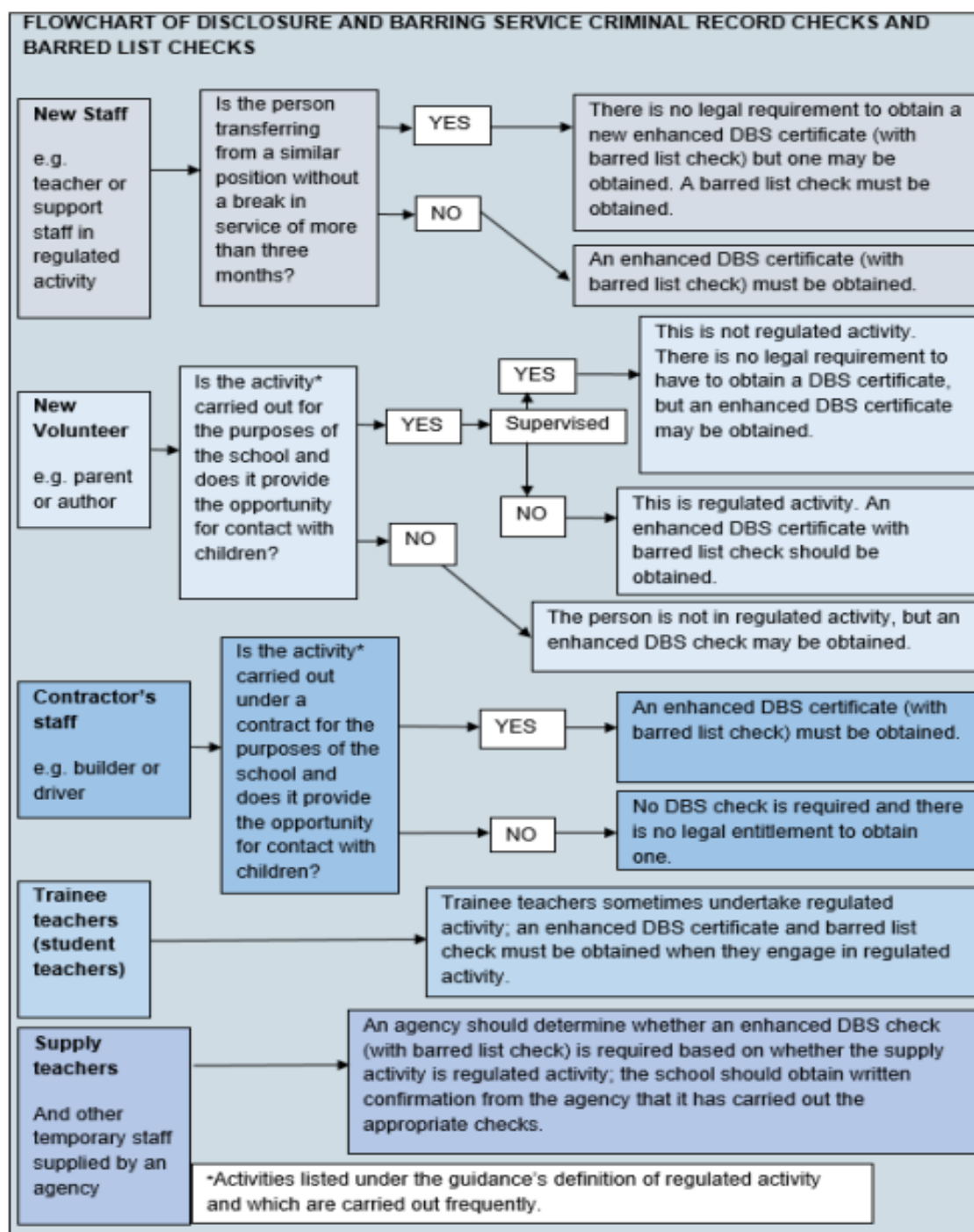
<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

ALLEGATIONS FLOWCHART (Staff & Volunteers who work with children)				
STAGE ONE				
Working Together to Safeguard Children 2018 requires employers to inform the LADO within one day of becoming aware of an allegation.				
If you suspect a child is at risk of immediate harm, contact Wandsworth MASH and/or call the Police on 101				
Employer to contact LADO for advice ( <a href="mailto:LADO@Wandsworth.gov.uk">LADO@Wandsworth.gov.uk</a> / Anita Gibbons - 07974 586461) and / or complete the LADO referral form and send to the MASH team ( <a href="mailto:mash@wandsworth.gov.uk">mash@wandsworth.gov.uk</a> / 0208 871 6622)				
LADO will liaise with employer and police and make a decision on whether the concerns meet the threshold for formal LADO referral.				
If threshold is not met consultation will be closed at this time, ESL may be asked to make contact with the setting.				
If threshold is met employer will be requested to complete the LADO referral form if this has not been completed previously.				
LADO will record decision and return to employer for their records				
STAGE TWO				
LADO will convene a LADO management of allegations meeting within 5 working days				
At this meeting the plan of investigation will be agreed taking into account any police investigation and safeguarding actions will be confirmed				
Timeframe will be agreed and support to the employee will be confirmed				
Employer to update LADO during the investigation				
Employer to invoke disciplinary procedures if appropriate				
STAGE THREE				
LADO closure meeting held and will involve all appropriate professionals where the employer will present their findings / actions				
OUTCOME TO THE LADO PROCESS AGREED BY ALL PROFESSIONALS				
<b>Substantiated</b> There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm.	<b>Unfounded</b> There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.	<b>Unsubstantiated</b> There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.	<b>Malicious</b> There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.	<b>False Allegation</b> There is sufficient evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive.
Closure meeting will agree on DBS referral if appropriate and closure letter to employee				
See LADO Procedures using link on the <a href="#">Wandsworth Family Information Service LADO</a> page.				

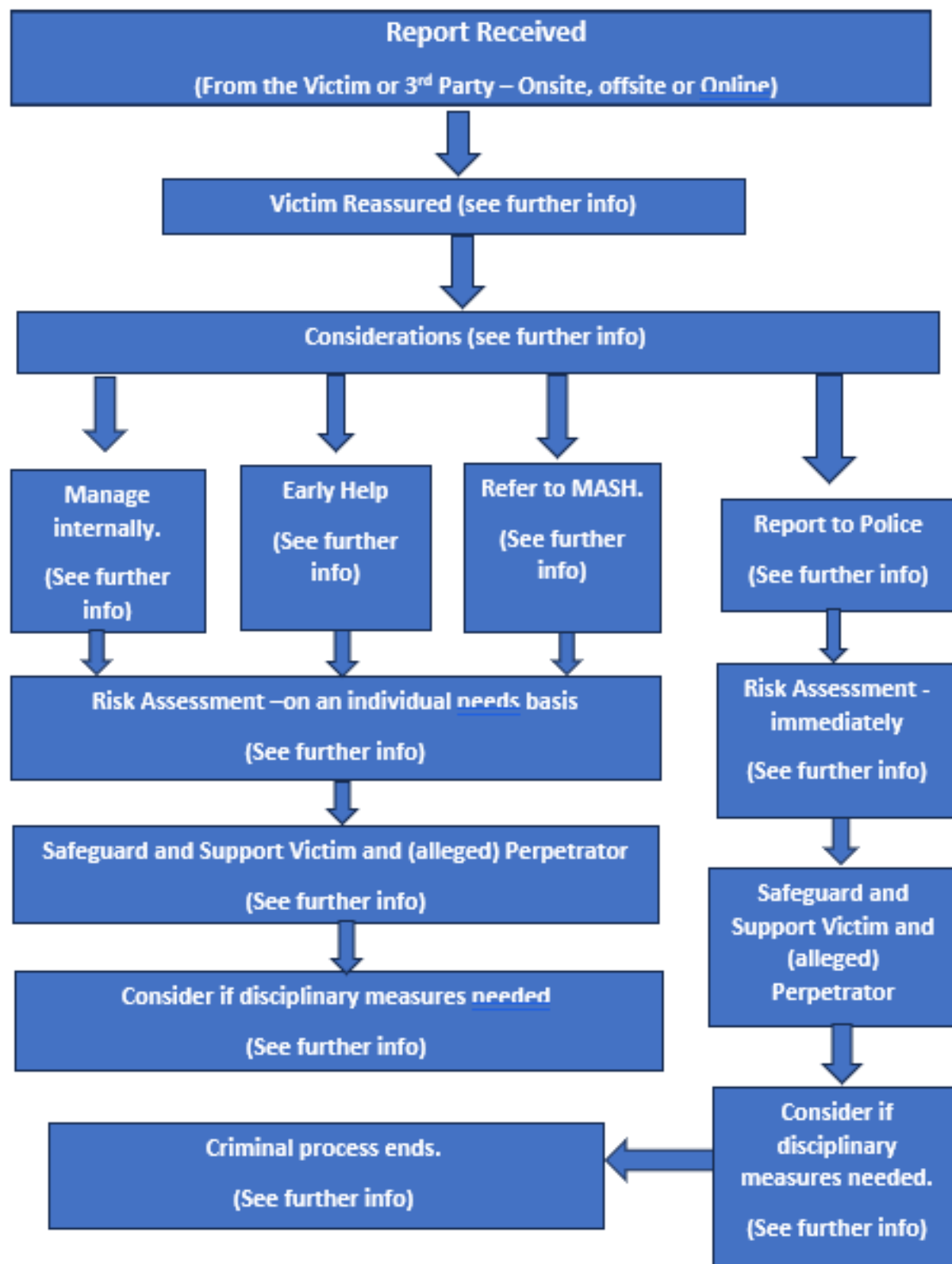
**FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS (KCSIE 2023 – Part 3 Page 66)**



# SEXUAL VIOLENCE AND SEXUAL HARASSMENT FLOW-CHART

SOURCE: [Statutory guidance overview: Keeping children safe in education 2023 – GOV.UK](#)

(Part 5 – Child-on-child sexual violence and sexual harassment (page 105 – page 135))



## **Further information**

### **Victim reassured**

- Taken seriously and kept safe, never be given an impression they are creating a problem,
- Confidentiality not promised,
- Listen to victim non-judgementally,
- Record the disclosure (facts as reported)
- Two staff present (if appropriate) – one being the DSL or reported to the DSL as soon as possible,
- Victim sensitively informed about referral to other agencies,
- If victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see Part 5 KCSIE 2023, paragraph 473)
- Parents of victim informed, unless this would put victim at greater risk.

If the victim is over 18, discuss how they want to be supported and by whom, whether they want you to support to share with their parents, whether they want to report a crime and provide them with support agency contacts (e.g. RASASC, SARC) which you can support them to contact. Again, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see Part 5 KCSIE 2023, paragraph 473)

**Anonymity** – Note that in cases of sexual violence there is a legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in school.

### **Supporting the (alleged) Perpetrator**

- Inform parents of alleged perpetrator – advise of any referrals that need to be made,
- If appropriate, ask alleged perpetrator about the incident,
- Remove alleged perpetrator from any shared lessons with victim (this is a neutral act, not an assumption of guilt)
- Ensure they have a trusted adult in your setting to provide support.

### **Considerations**

(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)

Immediately: consider how to support the victim and the alleged perpetrator.

- Wishes of the victim and parents/carers
- Nature of the alleged incident
- Are external support services required e.g. SARC, RASASC
- Ages of the children
- Development stage of the children
- Any power imbalance
- One off, or part of a pattern of behaviour
- Any on-going risks to victim, alleged perpetrator and others
- Other related issues and wider context (e.g. Exploitation, contextual safeguarding)

### **Manage internally**

One-off incidents which the school/college believes that the young people are not in need of early help or statutory intervention, which would be appropriate for the setting to manage internally under the behaviour and/or anti-bullying policy.



### Early Help

Non-violent harmful sexual behaviours (see Harmful Sexual Behaviours Framework, (NSPCC)) or refer to Brook Traffic Light Tool if trained. Also consider if a TAF is needed to identify unmet needs and support the young people involved.

### Refer to MASH

All incidents where a child or young person has been harmed, is at risk of harm or is in immediate danger. Children's social care will support with next steps.

NB - Where a victim is 18 or over, consideration needs to be given as to whether they would be considered a vulnerable adult and therefore a referral to adult services would be appropriate.

### Report to Police

All incidents of rape, assault by penetration or sexual assault (including if alleged perpetrator is 10 or under). Discuss next steps with police, for example: disclosing information to other staff, informing alleged perpetrator and their parents.

### Risk assessment

1. **Immediately** (when reported to police) – Do not wait for the outcome of the report to police before protecting victim. Emphasis should be on victim being able to continue normal routine.  
Alleged perpetrator to be removed from any classes with the victim (also consider shared spaces and journey to/from school. NB - this is not a judgement of guilt and safeguards should be considered as above, for the alleged perpetrator.
2. **Individual needs basis** – (see paragraphs 480 - 482 – Part 5 KCSIE 2023).  
All risk assessments should be completed as a multi-agency, where possible, (consider which agencies are currently working with either victim or alleged perpetrator) and shared with parents and victim or alleged perpetrator to ensure they are adhered to. You should not delay putting together a risk assessment if other agencies are not initially available in order to safeguard all involved and the school community, but this should be reviewed as a multi-agency as soon as possible.

Risk assessments should be regularly reviewed and adjusted as appropriate.

### Safeguard and support Victim and alleged perpetrator

Identify and signpost to relevant support agencies e.g. RASASC

### Disciplinary measures taken

Refer to setting's own behaviour and/or anti-bullying policy.

If reported to police, disciplinary measures may be undertaken based on balance of probabilities, unless prejudicial or unreasonable. Ensure actions do not jeopardise the investigation. Setting to work closely with police and/or other agencies.

### Criminal process ends

**Conviction or caution** - follow your setting's behaviour policy. If the pupil remains in school, make clear your expectations, keep victim and perpetrator apart. Consider victim's wishes.

**Not guilty** – support victim and alleged perpetrator.

**No further action** – support victim and alleged perpetrator.



2023-2024

# CHILDREN AND FAMILIES STRUCTURE CHART – AUGUST 2023

