



Safeguarding and Child Protection Policy A1

**Dolphin School Trust
inc. Noah's Ark Nurseries**

Reviewed by:	Adam Woodcraft (DSL) Lucy Price (Headteacher)
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1 Purpose of the policy

Dolphin School and Noah's Ark Nurseries aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- We will always act in the best interest of the child

We are committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We expect everyone who works in our school to share this commitment. This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Ensuring that members of the governors, the Headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful, and this should not prevent staff from having a professional curiosity and speaking to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation. The school takes a zero tolerance approach to abuse, including child-on-child abuse.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

2. Scope and Responsibilities

The DSL for Dolphin School and Noah's Ark Dolphin is Adam Woodcraft and the Early Years DSL for Noah's Ark West Side nursery is Rachael Strachan. In the absence of the DSL, Child Protection matters will be dealt with by one of the Deputy DSLs, Lucy Price, Jeff Schmidt or Victoria Githae.

Safeguarding Team			
Name	Role	Responsibility	Contact
Adam Woodcraft	Early Years Co-ordinator	Designated Safeguarding Lead, Operation Encompass Key Adult, Designated Teacher for Looked After Children	07707680311 safeguarding@dolphinschool.london
Rachael Strachan	Head of Noah's Ark West Side	Deputy Designated Safeguarding Lead	rachael.strachan@dolphinschool.london Tel no (term time): 0207924 3472 ext 209

		& West Side Lead	Mobile no: 07780 550074
Lucy Price	Headteacher	Deputy Designated Safeguarding Lead	head@dolphinschool.london
Jeff Schmidt	Senior Deputy Head	Deputy Designated Safeguarding Lead	jeff.schmidt@dolphinschool.london
Victoria Githae	Deputy Head	Deputy Designated Safeguarding Lead	victoria.githae@dolphinschool.london
Andy Goodwin	Governor	Nominated Governor for Safeguarding / Child Protection	andy.goodwin@dolphinschool.london
Petronella Van der Vliet	Governor	Chair of Governors	petronellavandervliet@dolphinschool.london

Key external agencies, services and professionals' contact details	
Wandsworth Local Authority Designated Officer (LADO)	Anita.Gibbons@richmondandwandsworth.gov.uk Lado@wandsworth.gov.uk 07974 586461 / 0208 871 5188
Wandsworth Local Authority Children's Social Services	wscp@wandsworth.gov.uk 020 8871 7401
Wandsworth Multi-Agency Safeguarding Hub	Wandsworth Multi-agency Safeguarding Hub (MASH) 2nd Floor Town Hall Extension Wandsworth High Street London SW18 2PU 0208 871 6622 Telephone: 020 8871 6622 Email: mash@wandsworth.gov.uk Outside of normal office hours (after 5pm weekdays or on weekends): 020 8871 6000
Multi-Agency Referral Form (MARF)	Multi-Agency Referral Form
Support and Advice about Extremism	Anti-terrorism hotline: 0800 789 321 Police Richard Nuttall (Acting Inspector) Manuela Marin (Police Community Support Officer) Emergency: 999 Non-emergency number: 101 Contact Wandsworth police

Wandsworth Education Safeguarding Lead	Sophie.allen@richmondandwandsworth.gov.uk 07866 956554
Wandsworth Family Information Service -Thrive	Family Information Service thrivewandsworth@richmondandwandsworth.gov.uk Helpline - 9am to 5pm, Monday to Friday: 020 8871 7899
Childline (NSPCC)	0800 11 11
NSPCC Whistleblowing Advice line	0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) Weston House, 42 Curtain Road, London EC2A 3NH Email: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	Tel: 0800 136 663 Email: help@nspcc.org.uk
Disclosure and Barring Service	Address: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF Tel: 03000 200 190 Email: customerservices@dbb.gov.uk
Teaching Regulation Agency	Address: Teaching Regulation Agency, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT Tel: 0207 593 5393 Email: TRA.caseworker@education.gov.uk
Independent Schools Inspectorate	Tel: 0207 6000 100 Email: info@isi.net

All members of the School community, including but not limited to, the Headteacher, staff, governors, pupils, parents, visitors, volunteers, supply staff are expected to comply with this Policy and its procedures. It applies wherever members of the School community are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

Contractors and external clubs providers are aware that while they are responsible for their own safeguarding and child protection policies and procedures, the school may refer any concerns they have about the provider to the local authority.

It is the responsibility of the governors to ensure that the School complies with its legislative duties and has regard to the Department for Education's guidance Keeping Children Safe in Education to ensure that the School's policies, procedures and training are effective and comply with the law. The Headteacher will constantly monitor the effectiveness of the implementation of this Policy and will revise it where necessary. The

Headteacher will ensure that any changes in this Policy will be drawn to the attention of all staff. The governors have nominated one of its members to manage child protection incidents on behalf of the governing body and to liaise with external agencies where required. The nominated Safeguarding Governor is Mr Andy Goodwin. The governors will satisfy themselves that safeguarding matters are managed and monitored in accordance with this policy.

The DSL is a member of the Senior Leadership Team and has the status, authority, skills and experience to take day to day lead responsibility for safeguarding and child protection. The School will ensure that the DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. The DSL will be aware of pupils who have a social worker. The DSL also has responsibility for the filtering and monitoring systems in the school, ensuring that they are functional and effective. The DSL meets regularly with the Headteacher to review any safeguarding concerns and safeguarding is always first on the agenda at staff meetings and SLT meetings. The DSL also meets with the Safeguarding governor in order to review anonymised case studies. The Safeguarding governor also meets with staff to review their knowledge and use of school safeguarding procedures. The School recognises that looked-after and previously looked-after children may be particularly vulnerable. The DSL will ensure that appropriate staff have access to the information required to safeguard and support these pupils. Where a pupil is looked after, the DSL will hold details of the child's social worker and the Virtual School Head in the local authority responsible for the child, and will liaise with them as appropriate. If the DSL is unavailable a member of the safeguarding team can be contacted using the contact details listed above.

Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's class teacher who will notify the relevant DSL in accordance with these procedures.

In accordance with Annex B of Keeping Children Safe in Education, the main responsibilities of the DSL are: safeguarding and child protection within the school, managing referrals from school staff or any others from outside the school; working with external agencies and professionals on matters of safety and safeguarding; undertaking training; raising awareness of safeguarding and child protection amongst staff and parents; ensuring child protection information is transferred to the pupil's new school; being aware of pupils who have a social worker; and working with others to ensure that the school's filtering and monitoring systems are functional and effective.

3. Key Definitions

Safeguarding

This is broader than child protection, and includes:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- taking action to enable all children to have the best outcomes

Child Protection

This 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. This includes harm that occurs within or outside the home, including online.

LADO

Local Authority Designated Officer(s) for Child Protection. Each Local Authority should have designated a particular officer, or team of officers, to be involved with the management and oversight of allegations against people that work with children. The term 'LADO' in this document is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology the local safeguarding partners may use.

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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 wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Family help

Providing support as soon as a problem emerges, at any point in a child's life.

Harm

Ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

4. Mission Statement

Dolphin School and Noah's Ark Nurseries (the School) is fully committed to the safeguarding and welfare of children, and expects all members of the School community to share this commitment.

The School community forms part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility. To fulfil this responsibility effectively all professionals adopt a child-centred approach, and consider, at all times, what is in the best interests of the child.

The Department for Education's (DfE) statutory guidance 'Keeping Children Safe in Education (September 2026)' defines 'safeguarding and promoting the welfare of children' as 'protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.' Children include everyone under the age of 18. We ensure that children at the school feel safe, secure and listened to.

Staff and volunteers are advised to maintain an attitude of 'It could happen here' where safeguarding is concerned. If staff are concerned about the welfare of a child, they should always act in the best interests of the child. If staff are unsure about any aspect of safeguarding they should immediately speak to the Designated Safeguarding Lead (DSL), or a deputy DSL, without delay, and should not assume that a colleague will raise the matter and share information that may keep a child safe. Details of the School's DSL and deputy DSLs are set out in the grid in [section 2](#). It should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL.

This is a whole school Policy which applies from the Early Years Foundation Stage (EYFS) to Year 6. Any reference to child, pupil or staff member in this Policy equally applies to a child, vulnerable adult or staff

member. Children who have been abused or are at risk of abuse are given appropriate support. Safeguarding issues are explored as part of the curriculum and children are made aware that they can talk to any member of staff but especially their class teacher or a member of the safeguarding team.

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help of Family Help. Children with special educational needs or disabilities (SEND), certain health conditions, have a mental health need or are on a part time timetable can face additional safeguarding challenges. We recognise that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- the need for intimate care or that children with SEND are isolated from others
- that children with SEND are more likely to be dependant on adults for care
- issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content or behaviours in school, or the consequence of doing so

At Dolphin School Trust we provide extra pastoral support and attention for these children through the partnership of the class teacher, the SENDCo and Learning Support Assistants.

This Policy is available on the School website.

This Policy must be read in conjunction with the following:

- Anti-Bullying Policy
- Behaviour Management Policy
- Staff Code of Conduct
- Data Protection Policy
- Acceptable Use Agreement for staff
- E-Safety Policy
- Missing Child Policy
- Child Missing Education Policy
- Safer Recruitment Policy
- Relationships, Health & Sex Education Policy
- Whistleblowing Policy

Copies of the above policies are available on our website and from the school office.

This policy is informed by statutory government legislation and is in line with Wandsworth Children Safeguarding Partnership's policy and procedures.

5. Human Rights and Equality Statement

We understand and recognise our obligations under the Equality Act 2010 and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or

belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. We will also consider our duty to make reasonable adjustments for disabled pupils.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to antidiscriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs (SEN) or disabilities
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- have experienced Domestic Abuse
- have a social worker (as it is an indicator that the child is more at risk than most pupils, they may be vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health)

6. Statutory and Regulatory Framework

This Policy complies with or has regard to the following:

- [The Education \(Independent School Standards\) Regulations \(2014\)](#)
- [Keeping Children Safe in Education \(2026\)](#)
- [Early Years Foundation Stage \(EYFS\) Statutory Framework \(September 2025\)](#)
- [Disqualification under the Childcare Act 2006 \(August 2018\)](#)
- [What to do if you're worried a child is being abused: advice for practitioners \(March 2015\)](#)
- [Working Together to Safeguard Children \(2026\)](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(May 2024\)](#)
- [Prevent Duty Guidance for England and Wales](#)
- [The Prevent Duty: Departmental advice for schools and childminders \(2023\)](#)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Multi-agency guidance on female genital mutilation \(July 2020\)](#)
- [Children Missing Education \(August 2024\)](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(July 2025\)](#)
- [Behaviour in schools \(February 2024\)](#)
- [Working together to improve school attendance \(August 2024\)](#)
- [Meeting digital and technological standards in schools and colleges \(March 2025\)](#)
- [After school clubs, community activities, and tuition \(safeguarding guidance for providers\) \(September 2023\)](#)
- [Safeguarding and protecting people for charities and trustees \(June 2022\)](#)
- [Children's Wellbeing and School's Act 2026](#)
- [Crime and Policing Act 2026](#)
- [Data \(Use and Access\) Act 2025](#)

This policy also takes into account the procedures and practice of Wandsworth Local Authority as part of the multi-agency safeguarding arrangements set up by the Wandsworth Safeguarding Children Partnership (WSCP) which is jointly led by the Police, Integrated Care Board and the Council.

7. Practical Advice

Concerns about a child

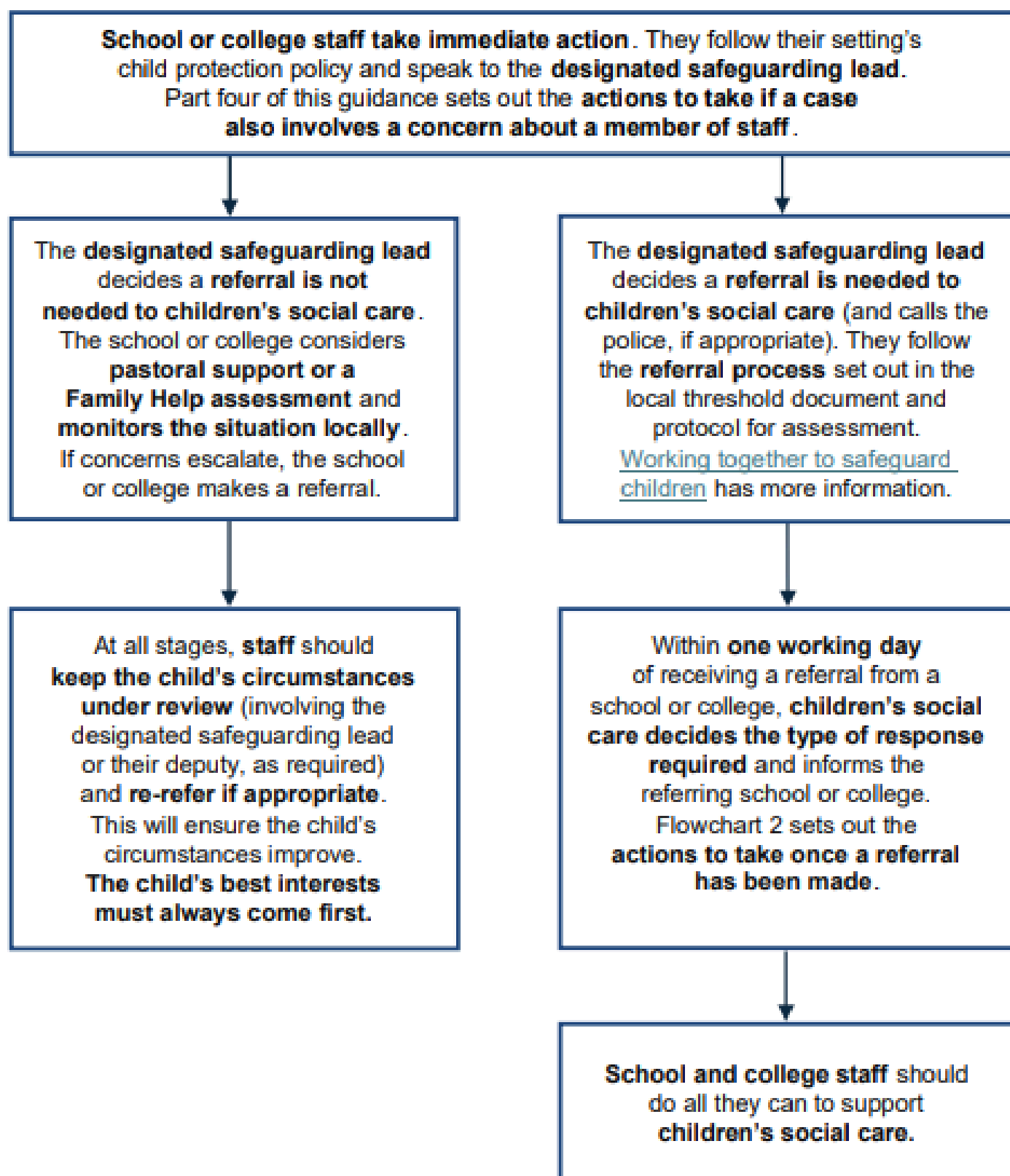
The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the school or college, and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact ISI directly if they wish.

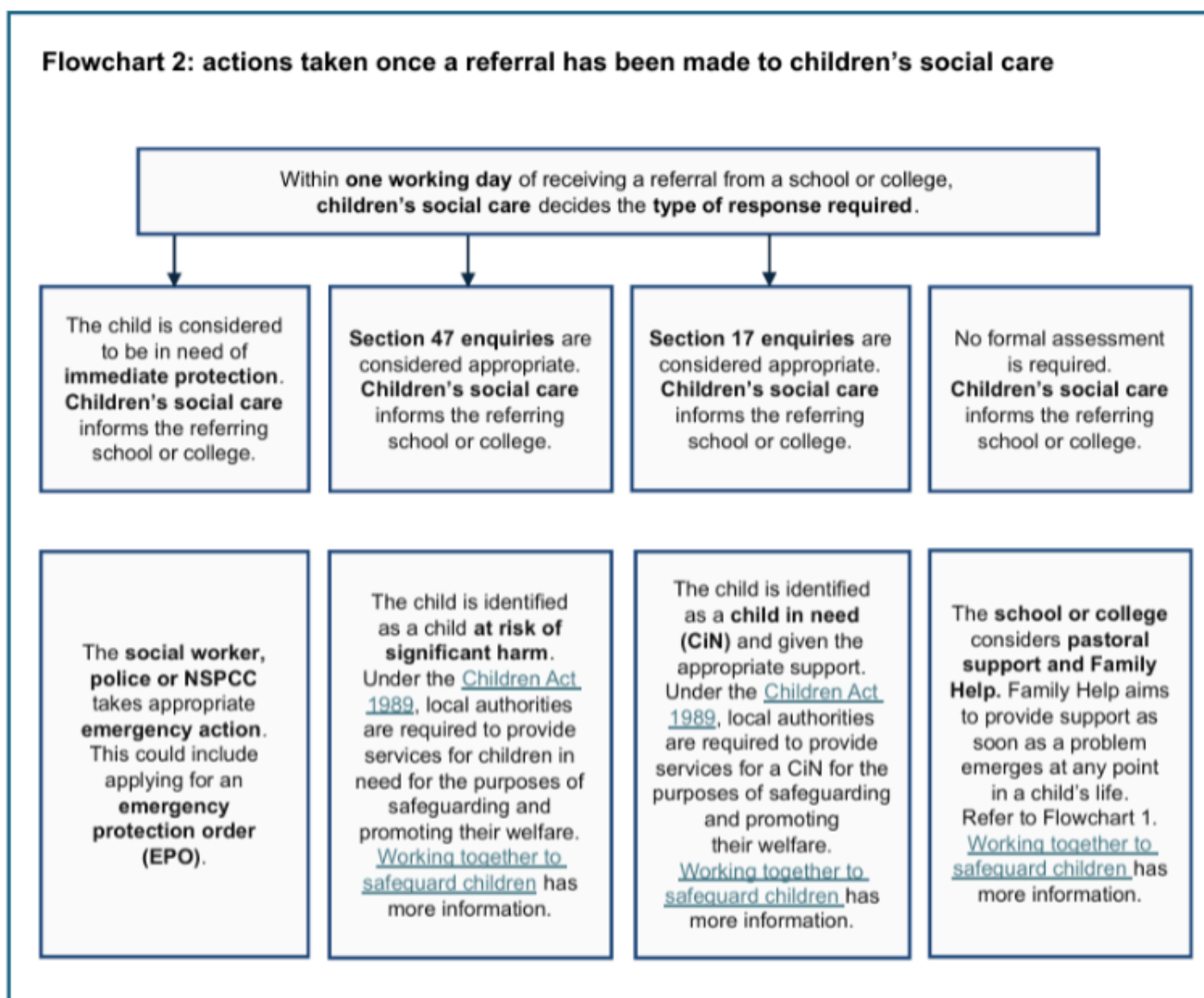
The School has arrangements for listening to children and providing early help.

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. School staff should notify the DSL when they become aware of private fostering arrangements. The school itself has a duty to inform the local authority of the arrangements. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Flowchart 1: actions taken by a school or college when there are concerns about a child



Flowchart 2: actions taken once a referral has been made to children's social care



Safeguarding and medical conditions

A safeguarding referral would only be needed where an incident highlighted concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. A safeguarding risk might occur when relevant information about a child's medical condition is not provided to the school or where they are repeatedly sent without essential medication thereby putting the individual at risk.

Young Carers

We will be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services. We support young carers by having a register, named point of contact, Mr Adam Woodcraft and a link with a Young Carer's service [Wandsworth Carers Centre](#)

Procedures For Dealing With Concerns About A Child

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

In the first instance, any concerns should be shared with the DSL. These concerns should promptly be recorded on the Engage platform. The DSL, in consultation with the safeguarding team will decide on which action to take regarding who else needs to be informed. The child who has made an allegation or complaint should be supported and given the opportunity to talk to a trusted adult.

The guidance, [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) (May 2024) supports staff who have to make decisions about sharing information. The governors recognise the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The governors will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them 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 the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions
- observe their behaviour
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The details should be recorded on Engage and should include the date and time of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information should be kept confidential and will be stored.

If a member of the School community suspects or discovers that a pupil is the victim of abuse, whether physical, emotional, sexual or as a result of neglect, she/he must immediately inform the School's DSL, or their deputies, except in the case of an allegation which itself involves a DSL, in which case the matter should be reported directly to the Headteacher.

Contact details for the Wandsworth Multi-Agency Safeguarding Hub (MASH), the Local Authority Designated Officer (LADO) for Child Protection and other bodies mentioned in this Policy are located in [section 2](#).

Dealing with disclosures

If a pupil discloses directly to a member of staff or volunteer, he/she:

- must listen carefully to what is said, using active listening techniques, and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- must only ask open-ended questions such as 'How did that happen?', 'What was happening at the time?' or 'Is there anything else you want to tell me?'
- must not ask leading questions which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child's mind.
- must not interrupt the child when he/she is speaking.
- **MUST NEVER GIVE UNDERTAKINGS OF ABSOLUTE CONFIDENTIALITY TO A PUPIL;** breaking a child's confidence would be inappropriate, it is better to say that you might have to tell someone who will ensure the correct action is taken.
- should reassure the child they have done the right thing and tell them they are not to blame.
- must make notes of the details of the disclosure and upload to Engage, using the child's words where possible. This note should be made immediately and the DSL must be informed or, if he is unavailable, a DDSL or take advice from local children's social care
- should offer ongoing support.

Receive - Listen actively, open body language, accept, non-judgmental. Use TED (tell, explain, describe)

Reassure - 'You've done the right thing by coming to me', re-assure child that you have listened and hear what they are saying; don't promise what can't be delivered

Respond - Tell what you are going to do and do it. Ensure child is ok before leaving

Report - As soon as possible, to the Designated Senior Lead (DSL) in the school / setting

Record - Vital to stick to the facts, no opinions – Think about When? Where? Who? What?

Review – Take responsibility to follow up any referral (via your DSL)

Family Help

All staff play an important role in safeguarding and promoting the welfare of children and should be alert to children who may benefit from support before problems escalate. This may include support from universal or community-based early help services, or more targeted support through Family Help.

Family Help provides support as soon as a problem emerges, at any point in a child's life. Staff should speak to the DSL, or a deputy DSL, about any concerns or emerging issues. Where appropriate, information may be shared with other professionals to support early identification and assessment. Taking these steps may prevent concerns from escalating.

Any child may benefit from early help or Family Help, but all staff will be particularly alert to the potential need for support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant themselves and/or is a parent themselves
- has exhibited early signs of abusive, violent or harmful behaviours
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- 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 alcohol and other drugs themselves
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child

The School will also be alert to the potential need for Family Help for a child who comes from a split family, looked after children, previously looked after children and care leavers. The DSL will inform the class teacher about the child's circumstances. The class teacher will monitor the child and put in place any necessary special arrangements and support.

Contextual Safeguarding

Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm outside of their families, including within peer groups, local neighbourhoods and online environments. Traditional child protection models have tended to focus on risks within the home, typically involving parents, carers or other trusted adults. However, this does not account for the considerable amount of time young people spend in social settings beyond their family, where peer influence, unsupervised environments and online platforms may pose significant risks to their safety, wellbeing and development. Harm outside the home (HOTH) recognises that a child's environment and social context, including their peer network, community and wider societal influences can shape their behaviours, experiences and vulnerability. Consequently, it seeks to identify and respond to harm occurring in these domains and to address the systems, norms and settings that allow such harm to occur. This includes altering unsafe environments as well as supporting the individual child. Research has shown that young people are often influenced as much by social dynamics and external factors as by family relationships. Dolphin School therefore considers these broader influences when assessing safeguarding risk and designing interventions. HOTH encompasses a range of extra-familial harms, including (but not limited to):

- Child-on-child (including harassment and violence) and relationship abuse
- Child criminal exploitation (CCE) and child sexual exploitation (CSE)
- Online abuse, grooming and harassment
- Missing episodes or absconding from education
- Gang involvement, serious youth violence and knife crime
- Radicalisation and extremist ideologies
- Trafficking and modern slavery
- Abuse or exploitation in public spaces, including transport networks, shops, parks or parties

All staff have a duty to be alert to such risks and apply professional curiosity when assessing a young person's context. Where concerns arise, they must be recorded and referred to the Designated Safeguarding Lead. The DSL will:

- Review contextual information, including peer dynamics, local intelligence and online activity where appropriate.
- Undertake contextual risk assessments, especially where patterns of harm or vulnerability extend beyond the home.
- Liaise with external agencies such as the Multi Agency Safeguarding Hub, Youth Justice, Family Help or Metropolitan Police as necessary.
- Work with relevant partners to change or manage the environments where risk is present, and ensure interventions are child-centred, proportionate and responsive to the wider context.

The DSL, and deputies where appropriate, are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns. However, in the unlikely event of the DSL and all deputy DSLs being unavailable, staff must speak to a member of the Senior Team for Safeguarding regarding any safeguarding concerns and/or take advice from Wandsworth Multi-Agency Safeguarding Hub. In these circumstances, the DSL or a deputy DSL should be informed of any action taken as soon as possible.

Signs and symptoms of abuse and neglect

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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 wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse. All staff, but especially the designated safeguarding lead (and deputies) should 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

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. Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with or using weapons, often in the context of bullying or and it can also be associated with criminal exploitation. Staff will report any concerns about a child carrying or using a weapon (or expressing a desire to do so) to the DSL or a deputy. The DSL will then assess risk and, where relevant, put in place a 'safety and support plan'. Where information

indicates a risk to others and the individual pupils for example where a pupil has previously carried, threatened with or used a knife or weapon, it is incumbent upon the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. The DSL will have a conversation with the sending or receiving school where there are issues or concerns.

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 from 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. Emotional abuse may include verbal abuse such as persistent criticism, belittling or name-calling.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 nonpenetrative 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 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.

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, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Affluent neglect describes the form of child neglect that occurs in wealthy families, where the neglect is often emotional rather than physical and is harder to detect due to the absence of poverty-related signs. Characteristics can include emotional distance, excessive academic pressure, lack of supervision, and material indulgence without appropriate emotional support. Identifying affluent neglect is difficult because social workers may face unconscious biases, and affluent parents can use their social and financial capital to obstruct investigations, making it challenging to intervene effectively and safeguard these children.

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health concerns could include self-harm, signs of an eating disorder, suicidal ideation or suicide.

Staff have four key roles: promoting good mental wellbeing and preventing the onset of mental illness; observing pupils and identifying early those who may be experiencing mental health problems or at risk of

developing one; ensuring early targeted support is provided; and liaison with / referral to specialist services where needed.

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.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or DDSs. The Headteacher is named as the Senior Mental Health Lead and Mrs Jess Hopkins (jess.hopkins@dolphinschool.london) is the nominated Mental Health Governor.

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.

Further advice and guidance can be found:

[Preventing and Tackling Bullying](#)

[Mental Health and Behaviour in Schools](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Every Mind Matters](#)

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 DSL, the child and parents. Parental consent is needed 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 the 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 DSL and parents. Parental consent for referral must be obtained.

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 DSL 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:

[Wandsworth Level of Need Framework to Multi-Agency Partners](#)

Alienating Behaviours

Alienating behaviour is defined by the Children and Family Court Advisory and Support Service (CAFCASS) as *“An ongoing pattern of negative attitudes and communication about the other parent that has the potential or intention to undermine or even destroy the child’s relationship with their other parent... it includes conveying false beliefs or stories, and withholding positive information from the child about the other parent, with the relative absence of observable positive attitudes and behaviours... these tactics can foster a false belief that the other parent is dangerous or unworthy”*.

The term ‘Alienating Behaviours’ is therefore used to describe how one parent or carer undertakes and / or expresses an ongoing pattern of negative attitudes and communication about the other parent or carer that have the potential or intention to undermine, manipulate or even destroy a child’s relationship with the other parent or carer. Alienating behaviours range in intensity, duration and their impact on children.

Alienating Behaviours can be emotionally and psychologically abusive and can have long lasting impact on the wellbeing of a child and their relationship with both parents.

Some alienating behaviours that may be observed include:

- influencing a child to disrespect the targeted parent
- limiting contact with the targeted parent
- making false allegations of abuse
- belittling targeted parent

More information can be found on [CAFCASS website](#) and [Coached Children – Understanding the impact of parental alienation](#)

Article - [Guidance on ‘parental alienation’ in family court battles](#)

Child-on-Child Abuse

All staff are aware that children are capable of abusing their peers i.e. Child-on-Child abuse and that this can happen both inside and outside of school or online. Child-on-Child abuse is unacceptable and will be taken seriously by the School. Dolphin has a zero-tolerance approach to Child-on-Child abuse.

It can manifest itself in many ways, this is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- abuse in intimate personal relationships between children
- causing someone to engage in sexual activity with or without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- sexual violence and sexual harassment (see further guidance in [KCSIE Part 5](#))
- ‘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.
- sharing nudes and semi-nudes (previously known as ‘sexting’). We follow guidance given to schools by the [UK Council for Internet Safety Guidance: sharing nudes and semi-nudes](#) (March 2024); and [Child sexual abuse material generated by artificial intelligence \(June 2025\)](#) Any incident involving the sharing of a nude/semi-nude image - consensual or non-consensual - now requires a proportionate safeguarding response, considering age, development, circumstances, and any elements of coercion, exploitation or vulnerability.
- initiation/hazing type violence and rituals.

Staff are aware that gender issues can be prevalent when dealing with this type of abuse i.e., that it is more likely that girls will be victims and boys perpetrators, and that Child-on-Child abuse should not be tolerated or passed off as banter, part of growing up or “just having a laugh”. The threshold for dealing with such abuse is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Such abuse will be referred to local agencies.

The Personal, Social, Health and Citizenship Education (PSHE) syllabus aims to enable students to lead responsible, healthy and assertive lives and to develop skills and knowledge which will equip them with the ability to deal with a range of issues. A unit of lessons on good relationships is included in the PSHE programme. The unacceptable nature of all forms of bullying is introduced into class discussion, assemblies and into lessons where appropriate, e.g. drama improvisation.

Pupils who have been subject to child-on-child abuse are encouraged to immediately report any concerns to their class teachers or speak directly to a member of the Senior Leadership Team (SLT). Alternatively, pupils may seek help from the SENDCo. If a pupil makes an allegation of child-on-child abuse, staff should follow the following procedure:

- Show you care, help them open up. Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important.
- Phrases such as ‘you’ve shown such courage today’ help.
- Take your time, slow down. Respect pauses and don’t interrupt the child – let them go at their own pace.
- Recognise and respond to their body language.
- Remember that it may take several conversations for them to share what’s happened to them.
- Make it clear you’re interested in what the child is telling you. Show you understand, by reflecting back what they’ve said to check your understanding – and use their language to show it’s their experience.
- Understand that harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

For more information on responding to disclosures see [Recognising and responding to abuse](#)

A pupil against whom an allegation of abuse has been made may be suspended from School during the investigation and the School’s Behaviour Management Policy and Anti-bullying Policy will apply.

The School will take advice from Wandsworth Multi Agency Safeguarding Hub (MASH) on the investigation of such allegations, which give reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse, who are all treated as being “at risk”. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of MASH, parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult.

Support will be available to the victims, perpetrators and any other children affected by child-on-child abuse. This may be in the form of support from the SENDCo and may include support for siblings following incidents of sexual violence or sexual harassment.

The school acknowledges that, even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. 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.

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 persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. 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 social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE 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.

The below 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, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "[Child sexual exploitation: guide for practitioners](#)", Wandsworth have published a [Child Exploitation support pack](#), which can be read alongside the Children's Society and Home Office published guidance on Preventing Child Sexual Exploitation.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. 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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not

always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who are victims of CCE have been exploited will need additional support to help maintain them in education. It must be remembered that children cannot consent to CCE and often do not recognise what is happening to them. CCE can be committed or facilitated by an organised network, and that the victim may identify as being part of this group. This could constitute modern slavery and a modern slavery referral should be completed where a potential victim of CCE or CSE is identified. Victims are not always recognised and can be criminalised for actions they take while under coercion. It is not possible for children to consent to be exploited, abused or trafficked.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are 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 ways of identifying 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 (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged 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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#) and [The Children's Society County Lines Toolkit For Professionals](#).

Preventing radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism. This has become known as the Prevent Duty.

We recognise that protecting children from the risk of radicalisation is part of our 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.

When staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the DSL. The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. Full time staff members receive training on the Prevent Duty.

We use the curriculum to ensure that children understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

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.

Naheem Bashir is the Hate Crime & Prevent Coordinator for Wandsworth - naheem.bashir@wandsworthandrichmond.gov.uk, all assessments are to be carried out via MASH using the NRM ([National Referral Mechanism](#)) and the Referral route via MASH.

Please find further details from Wandsworth regarding [Children at risk of radicalisation](#)

To ensure that children are safe from terrorist and extremist material when accessing the internet in schools we use Fortiguard to monitor and Senso filter the content that is used and are regularly reviewed. We regularly teach pupils about online safety in accordance with ([KCSIE 2026](#)). 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 September 2023 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).

Channel

School staff 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 Counter-Terrorism and Security Act 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 Counter-Terrorism and Security Act 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 AND PREVENT MULTI-AGENCY PANEL GUIDANCE](#).

Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are

relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent/carers violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy

Operation Encompass

The School is part of Operation Encompass, a national police and early intervention safeguarding partnership which supports children who experience domestic abuse.

Through Operation Encompass the police are required to share information with the School about all police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL and inform us about the context of the incident and will include the child's perspective.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The School's DSL has completed the National Online Operation Encompass Key Adult training. All staff are encouraged to undertake the online training. The DSL provides training for all staff and Governors about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children.

Staff are aware of the need to understand that harm for children can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

[Home Office guidance on controlling or coercive behaviour](#)

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating or spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (for example, withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools this usually comes from a disclosure. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases. Staff are recommended to make a report orally by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, staff should report the case immediately to police, including dialling 999 if appropriate. In most cases reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. Further details on the information needed in order to make a report can be found [here](#)

For further information regarding FGM please refer to [Wandsworth Family Information Service](#)

Honour or Faith-based Abuse

Honour or Faith-based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the DSL as a matter of urgency.

The use of reasonable force or physical restraint

Physical restraint: All forms of corporal punishment are unlawful; the School does not use or threaten corporal punishment. The use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. There are circumstances when it is appropriate for staff to use force to safeguard children. This is enshrined in law and applies to any member of staff at the School. It can also apply to people whom the Headmaster has temporarily put in charge of pupils, such as unpaid volunteers or parents accompanying pupils on a school organised visit.

Application of code of restraint: This only applies where no other form of control is available and where it is necessary to intervene. The use of force or physical contact may be reasonable and proportionate in the circumstances to prevent a pupil doing, or continuing to do any of the following:

- Committing a criminal offence
- Injuring themselves or others
- Causing damage to property, including their own

- Engaging in any behaviour prejudicial to good order and discipline at the School or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere

Before intervening: Before intervening physically staff should, wherever practicable, tell the pupil to stop and what will happen if she does not. Staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Staff should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

Inform senior staff: Staff should inform the Headteacher immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. Staff should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the pupil. The parents, guardians or carers of the pupil should be informed about serious incidents involving the use of force. In the EYFS setting, the parents, guardians or carers will be informed about any use of force on the same day or as soon as is reasonably practical. The Headmaster will advise as to when parents should be contacted.

Action taken in self-defence or in an emergency: The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

Using reasonable force: There is no legal definition of "reasonable force". It will always depend on the circumstances. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Note that:

- any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented
- staff should recognise the additional vulnerability of children with SEN, disabilities and certain medical conditions before using reasonable force
- physical force could not be justified to prevent a pupil from committing a trivial misdemeanour
- any force should always be the minimum needed to achieve the desired result
- whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil

Gender-questioning children

We will adopt a documented decision-making process for social transition requests: we will not initiate action, but will have a process and keep records once a request is raised by a child or parent. We will ensure best-interests decisions involve the DSL, parents/carers (engaged as a priority, with their views given great weight), clinical evidence/advice where relevant, and relevant non-clinical advice such as the SENDCO. We will take account of wider health or neurodiversity factors. We will update record-keeping so relevant staff

know, and accurately record, a child's biological sex wherever it is recorded - this is a legal requirement, not a preference. We will build in a periodic review of any social transition arrangements, including pre-2026 decisions, involving the DSL and parents/carers. Social transition is an active intervention, not a neutral accommodation - long-term evidence is limited and it may affect psychological functioning and outcomes. Full social transition should be agreed very rarely at primary level. The Cass Review recommends early clinical involvement for pre-pubertal children. This is not a role untrained staff should undertake. We will update safeguarding awareness for children living "in stealth" (fully transitioned from an early age, with peers/staff unaware of biological sex): recognise heightened vulnerability approaching puberty and ensure DSL involvement. We will prepare procedures for supporting detransition in line with Cass Review recommendations, working closely with parents/carers and relevant experts. There is no reason to break confidence when a child confides feelings without requesting change, unless a safeguarding risk arises - usual safeguarding procedures apply once wellbeing or safety concerns are raised. Staff will discuss constraints sensitively with pupils (no opposite-sex toilets, changing rooms or accommodation; no single-sex PE where safety requires it), being conscious of staff and pupils' rights on religion or belief, and noting that using names instead of pronouns may be discussed as an option. We will take legal advice before responding to any staff request not to use a pupil's preferred pronoun. This remains a legally unresolved, case-by-case proportionality question - see *Higgs v Farmor's School* (Court of Appeal, 2025) and *Lister v New College Swindon* (Employment Tribunal 2024, on appeal). Not every gender-questioning child holds the protected characteristic of gender reassignment. Where this is unclear, we will treat the child as if they have the protected characteristic. Being lesbian, gay or bisexual is not in itself a safeguarding risk factor - though it can create vulnerability to discriminatory bullying. This is a distinct issue from gender-questioning. Cross-gender play and dress is common in childhood and, for most children, does not continue into adulthood - but may persist or intensify at puberty for a minority.

8. Children Missing Education

This should be read alongside our Attendance Policy which is available on our website and [Appendix 4 - Wandsworth Guidance](#).

Knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change. Parents are reminded annually to update their details at the beginning of the school year.

In response to the guidance in *Keeping Children Safe in Education* (2025) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

9. Confidentiality

The HM Government guidance, '[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)' supports staff who have to make decisions about sharing information. Staff should be mindful that sharing information at an early stage is essential for effective safeguarding and promoting the welfare of children. Page 4 of this advice sets out the seven golden rules to sharing information. The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Page 19 of Working Together to Safeguard Children contains a useful myth-busting guide to information sharing within a safeguarding context. If in doubt about information sharing, a member of staff should ask the DSL for advice.

A member of staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interest.

If staff need to share 'special category personal data, the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

CP files transfer within 5 school days in-year, or by the start of a new term. When deciding what information to share the school will consider: the relevancy of the information, including to the current safeguarding risk; what is necessary for the receiving setting to know; and whether it is clearly presented and appropriately contextualised. The receiving-school will pass on any risk-assessment requirement where a pupil has previously carried, threatened with or used a knife/weapon.

10. Complaints and allegations about staff

At Dolphin School Trust we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers, trainee teachers, agency staff and all contracted staff. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay; any concerns about the Headteacher should go to the Chair of Governors who can be contacted by email petronella.vandervliet@dolphinschool.london. Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Headteacher. Concerns may come from various sources, for example, a 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. The Headteacher will decide whether the concern is an allegation or low-level concern. The term 'low-level concern' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person (anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors) has:

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

- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, the school will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person ([defined above](#)) has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours 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.

If the concern has been raised via a third party, the Headteacher (or DSL) will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff, trainee teachers and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged and 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. We endeavour to foster a culture where low-level concerns are shared and addressed appropriately.

Low-level concerns should be recorded using the [Low-Level Concerns Reporting Form](#) on the Google Drive, including:

- name of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

If the concern involves the Designated Safeguarding Lead (DSL), it should be reported directly to the Headteacher in writing. If the concern is about the headteacher, the Chair of Governors should be contacted or where there is a conflict of interest the LADO should be contacted directly.

Records are kept confidential, held securely and comply with the Data Protection Act 2018. The school will decide how long they retain such information, but at least until the individual leaves their employment.

Records will be reviewed regularly with the Headteacher and DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. The name of the reporter will be included unless they request anonymity, which will be respected where possible.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

Low-level concerns will not be included in staff references, unless they meet the threshold for referral to the LADO and are found to be substantiated.

Role of Governors

The Headteacher will regularly inform Governors about the implementation of the low-level concerns procedure and share relevant data on its effectiveness.

The Safeguarding Governor may review anonymised examples to ensure concerns have been appropriately handled.

Supply staff

In some circumstances the school will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. Whilst the school is not the employer of supply teachers, **we will** ensure allegations are dealt with properly. In no circumstances **will** the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

The governors will discuss with the agency whether it is appropriate to suspend the supply teacher whilst they carry out their investigation. Agencies will be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school 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, are under the supervision, direction and control of the governing body when working in the school. They **will** be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation. When using an agency, the school will inform the agency of its process for managing allegations. This **will** include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

11. Safer Recruitment

We prevent people who pose a risk to children from working in our school by having in place robust safer recruitment procedures which are followed and by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with KCSIE 2026. In addition to obtaining the DBS (Disclosure and Barring Service) certificate, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

We ensure that agencies and third parties supplying staff provide us with the evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. Our single central record covers the following people: all staff, including teacher trainees on salaried routes, agency and third-party and supply staff who work at the school and a tab for Governors.

Every job description, person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. In line with guidance included within Keeping Children Safe in Education 2026 and reflecting good safer recruitment practice the school will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.

We ensure that at least one member of every interview panel has an up to date safer recruitment certificate and that those members of staff who are safer recruitment trained refresh their knowledge every three years.

We have a procedure in place to manage allegations against members of staff, supply staff and volunteers (and to respond to low level concerns) which are in line with the [Wandsworth Safeguarding Children Partnership procedures](#) and the expectations as outlined in Part 4 of [KCSIE 2026 - Safeguarding concerns or allegations made about staff, including trainee teachers, supply teachers, volunteers and contractors](#). We will communicate with Local Authority Designated Officer (LADO), through consultations and referrals when needed. Allegations related to any incidents when an individual or organisation is using the school premises for the purposes of running activities for children, will follow safeguarding policies and procedures, including informing the LADO' within 24 hours.

Supply teachers – we will consider all allegations against an individual not directly employed by the school, where disciplinary procedures do not fully apply, (for example, supply teachers provided by an employment agency). We will ensure allegations are dealt with properly and communication with the supply agency and Local Authority Designated Officer (LADO) is continued throughout the investigation.

We have an agreed Staff Code of Conduct which is compliant with 'Safer Working Practices', and includes - acceptable use of technologies, staff/pupil relationships, low level concerns and communications including the use of social media. See [Allegations against staff and volunteers who work with children \(or those in a position of trust\) on the WSCP website](#). Our Staff Code of Conduct Policy can be accessed via the school office.

We will ensure that written confirmation is received for agency and third-party supply staff from the employment business supplying members of supply staff showing that the relevant checks have been carried out and the appropriate certificates have been obtained. We will expect this written confirmation to include the date that these confirmations were received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

Further Guidance can be accessed through the Safer Recruitment Consortium document: [Guidance for safer working practice for those working with children and young people in education settings February 2022](#)

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity and needs an enhanced DBS check with barred list information, regardless of supervision arrangements. Existing volunteers who newly fall into regulated activity from 1 September 2026 must be checked (enhanced DBS+ barred list, or in defined circumstances a standalone barred-list check). Volunteers who are not in regulated activity should still have a written risk assessment on file, considering the nature of their role, what the school knows about the volunteer, and whether the lower level of check is appropriate.

12. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so. The school Whistleblowing policy can be accessed via the school office.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

We will refer to the [Whistleblowing: Guidance for Employers and Code of Practice](#) for further information and note that the NSPCC Whistleblowing Advice Line is available for all workers on - 0800 028 0285 and via email via: help@nspcc.org.uk. Further information can be found on the [NSPCC website](#).

We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of Safeguarding, which does include the attitude or actions of colleagues. If necessary, they will speak with the Headteacher, the chair of the governing body (petronella.vandervliet@dolphinschool.london) or with the Local Authority Designated Officer (LADO).

We have a clear reporting procedure for children, parents, and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures are in place for confidentially sharing and handling of low-level concerns.

We actively seek the views of children, parents and carers and staff members on our Safeguarding arrangements through surveys, questionnaires, and other means.

13 Site Security

All staff members have a responsibility to ensure our building is secure and for reporting any concerns that may come to light.

We will check the identity of all visitors and volunteers coming into school. Visitors are expected to sign in and out in the office and to display a visitor's lanyard while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance. The Visitor Policy can be accessed via our website or the school office.

The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child, or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

We will ensure that when our premises are used by organisations or individuals outside of the school day that all reasonable steps are taken, as required by law, to ensure the safety of the children and to protect them from harm. We will ensure that providers, their staff, and volunteers have a duty of care toward the children who attend. The document [Arranging Alternative Provision](#) details the safeguarding arrangements that we expect providers to have in place. We refer to the guidance for parents, more guidance for sports activities can be found in the NSPCC information [Safeguarding in Sports](#).

We will follow our safeguarding policies and procedures, as with any safeguarding allegation, including informing the LADO, if we receive an allegation relating to an incident that has happened when an individual or organisation has used our school premises for the purposes of running activities for children. This will cover any service provider that runs extra-curricular activities on our school site.

14. Safer Use of Technology

The School's E-Safety Policy and IT Acceptable Use Agreement set out comprehensive guidance and advice to pupils, staff and all members of the School community. Pupils are taught about how they can keep themselves and others safe online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. Online safety is taught as part of a broad and balanced curriculum, which includes lessons on staying safe online as part of the Personal, Social and Health Education syllabus.

Children are permitted to bring in their own mobile phones but the phone must be handed in to their class teacher at the beginning of the school day and collected at the end of the day.

The Staff Code of Conduct and IT Acceptable Use Agreement include guidance on the use of mobile phones, smart technology (including other electronic devices with imaging and sharing capabilities) and cameras.

Guidance to parents and staff on use of cameras in school is also set out as follows:

- pupils are not permitted use any personal mobile device with a camera facility on the premises unless specific permission is given
- parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
- staff may bring mobile phones/personal devices onto the premises but should not take photographs of pupils on their mobile phones/personal devices. Staff should only use equipment provided or authorised by the school when taking photographs of pupils for official school purposes. The school has a separate policy for the use of mobile phones. Mobile phones are only permitted in areas where pupils are prohibited.

15 Filtering and Monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems are Fortigate for filtering and Senso for monitoring. Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures. All our staff undertake training to understand the risks of poor filtering and monitoring and know how to share their concerns. The effectiveness of the filtering and monitoring arrangements of these systems is regularly reviewed by SLT and a record of these checks will be kept.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (**content risk**); reduce the risk of children being subjected to harmful online interaction with others including 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 (**contact risk**); restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (**commerce risk**); and help manage online behaviour that can increase a child's 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 (**conduct risk**).

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

Filtering and Monitoring is included where necessary in any risk management plans that are in place for vulnerable children.

The School ensures compliance with the DfE's 'Cyber security/filtering and monitoring standards for schools' by;

- Managing the Fortiguard filtering and Senso monitoring systems.
- The SLT reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.
- Annual cybersecurity training for staff.

Filtering and Monitoring is included in the full staff CPD programme and the governing body are supported in understanding their role in filtering and monitoring. The DSL has 'lead responsibility' for Filtering and Monitoring and this is included within their job description.

The School has regard to the DfE's guidance 'Generative AI: product safety expectations' when considering how the filtering and monitoring arrangements in place apply to the use of generative AI within education. The School ensures that any Generative AI products effectively and reliably prevent access to harmful and inappropriate content by pupils by:

- integrating the highest standards of filtering possible within the product, and
- using additional filtering solutions that work on top of an AI product.

The School has in place a separate E-Safety Policy which sets out further detail in this regard.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Please read our policy on AI acceptable use to see our position on the use of generative AI tools. [E-Safety policy](#)

16 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

17 Training

Induction Training (This is to be read in conjunction with the Induction Policy which can be requested from the school office.)

All staff joining the school will participate in an induction process. This will include agreeing they have read and understood:

- the Safeguarding and Child Protection policy
- the Behaviour Management policy
- the Staff Code of Conduct
- the safeguarding response to children who go missing from education
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Other Relevant Training

The DSL attends training every two years; and in addition to formal training, their knowledge and skills are refreshed at regular intervals, at least annually. They engage with Wandsworth training opportunities and twilight sessions over the year.

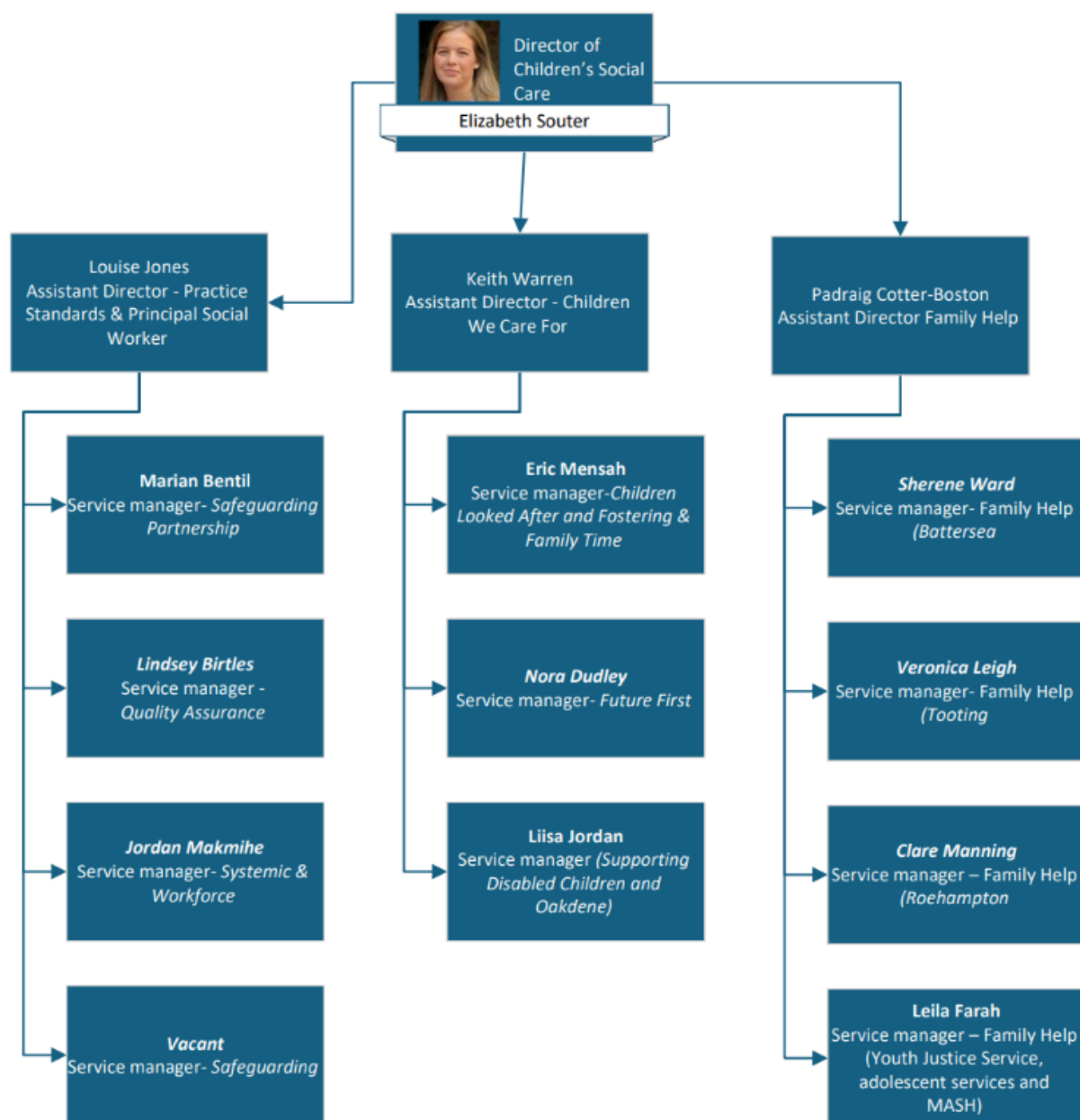
All other staff receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. They also complete an annual online refresher and KCSIE refresher to ensure they are up to date with all relevant changes.

Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated.

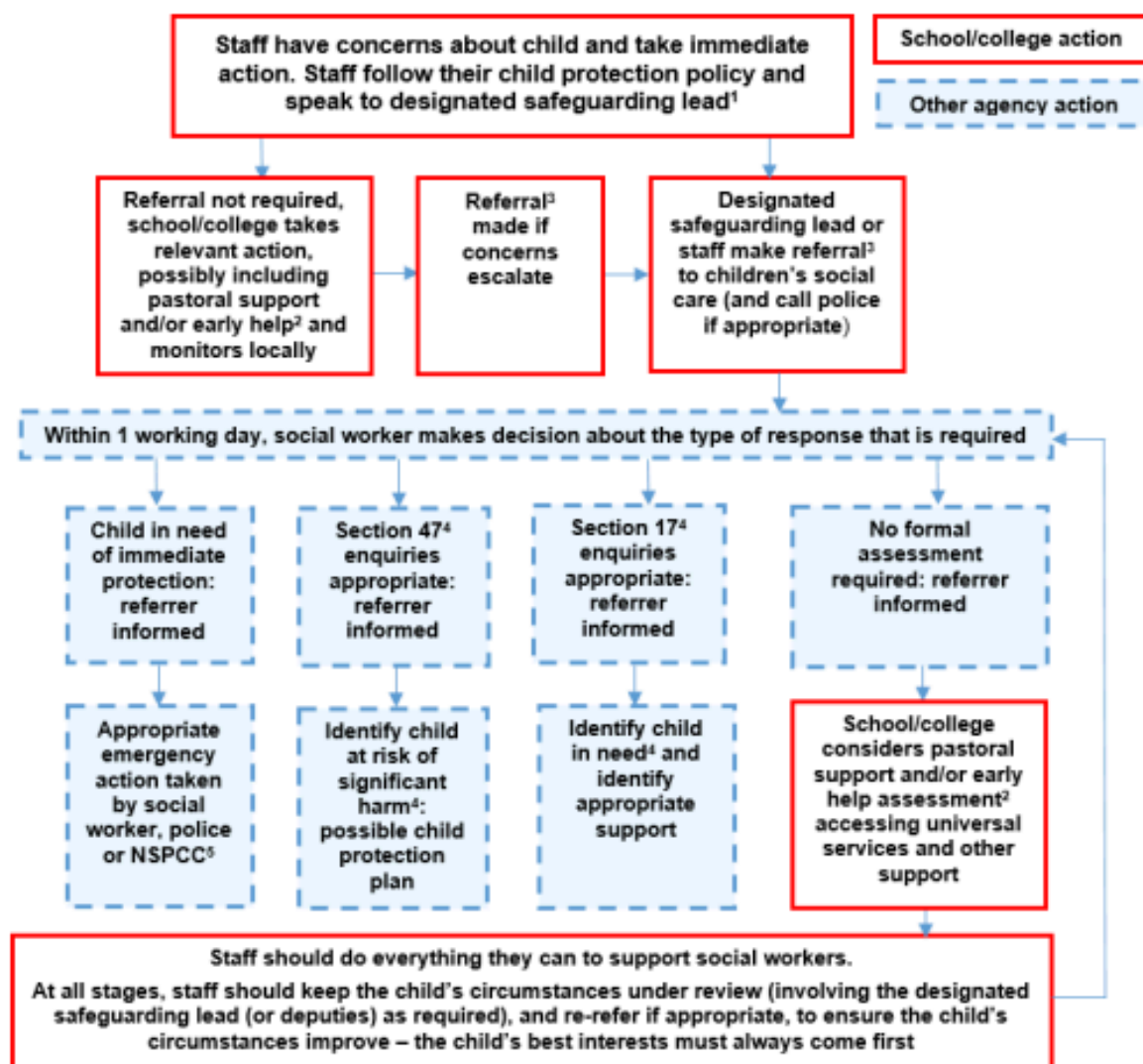
Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process and each interview panel has at least one interviewer trained in Safer Recruitment.

Appendix 1:

CHILDREN AND FAMILIES STRUCTURE CHART



Actions where there are concerns about a child



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

² 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. [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

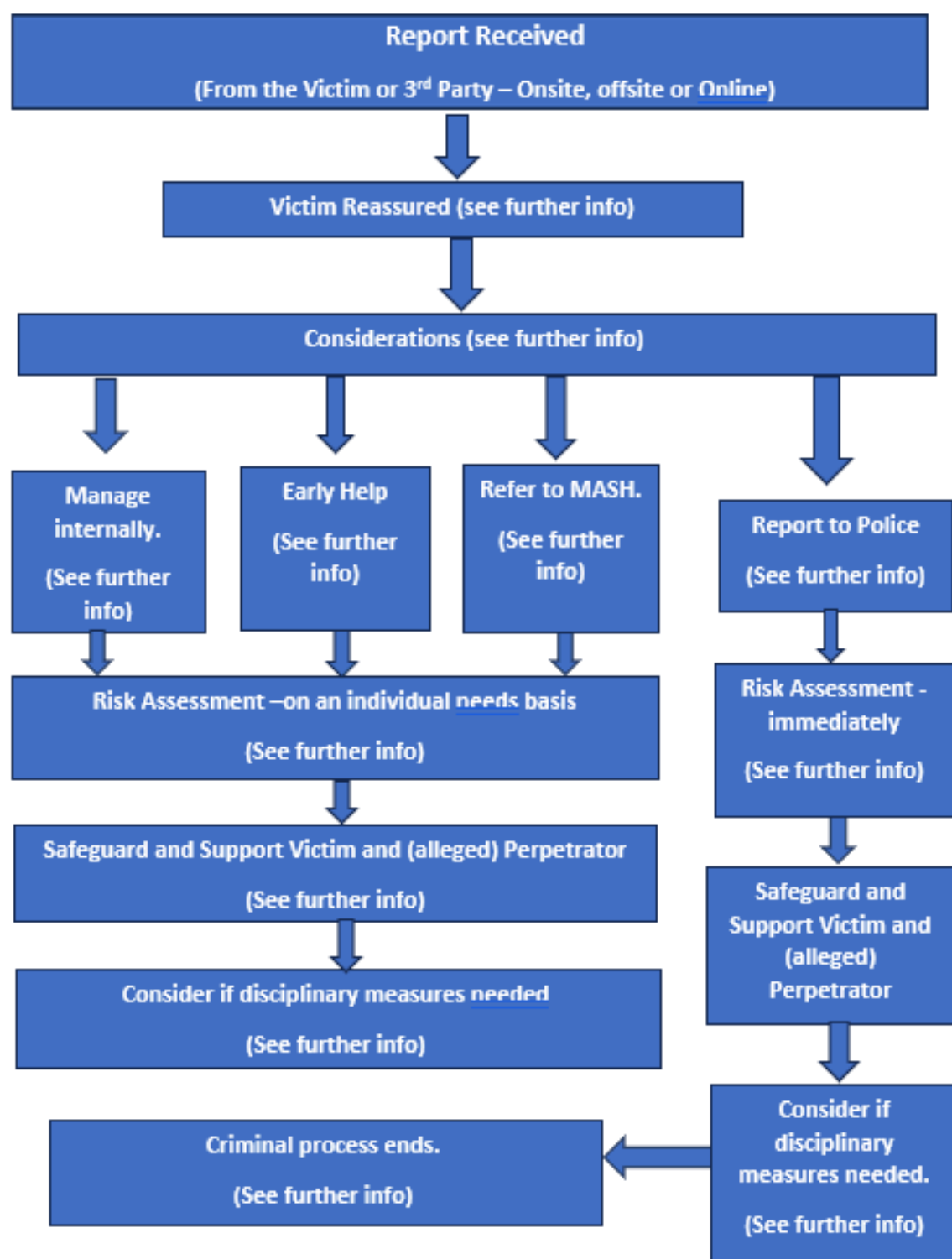
⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority 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 [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

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))



Appendix 4:

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, or those 'unexplainable and or/persistent absences from education'.

A child going missing from education is a potential indicator of abuse or neglect, see [Children Missing Education August 2024](#). School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, or those 'unexplainable and or/persistent absences 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.

Schools should put in place appropriate Child Protection - Safeguarding policies, procedures and responses for children who go missing from education, particularly those 'unexplainable and or/persistent absences 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, or those 'unexplainable and or/persistent absences from education'. See [Children Missing Education – August 2024](#)

All schools must inform their local authority (in Wandsworth, the Education Welfare Service) of any pupil to be deleted from the admission register. Pupils can only be deregistered under the 15 grounds set out in the Children Missing Education statutory guidance (2016), as follows:

1 8(1)(a) - where the pupil is registered at the school in accordance with the requirements of a school attendance order, that another school is substituted by the local authority for that named in the order or the order is revoked by the local authority on the ground that arrangements have been made for the child to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school.

2 8(1)(b) - except where it has been agreed by the proprietor that the pupil should be registered at more than one school, in a case not falling within sub-paragraph (a) or regulation 9, that he has been registered as a pupil at another school.

3 8(1)(c) - where a pupil is registered at more than one school, and in a case not falling within sub-paragraph (j) or (m) or regulation 9, that he has ceased to attend the school and the proprietor of any other school at which he is registered has given consent to the deletion.

4 8(1)(d) - in a case not falling within sub-paragraph (a) of this paragraph, that he has ceased to attend the school and the proprietor has received written notification from the parent that the pupil is receiving education otherwise than at school.

5 8(1)(e) - except in the case of a boarder, that he has ceased to attend the school and no longer ordinarily resides at a place which is a reasonable distance from the school at which he is registered.

6 8(1)(f) - in the case of a pupil granted leave of absence in accordance with regulation 7(1A), that — (i) the pupil has failed to attend the school within the ten school days immediately following the expiry of the period for which such leave was granted; (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.

7 8(1)(g) - that he is certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he nor his parent has indicated to the school the intention to continue to attend the school after ceasing to be of compulsory school age.

8 8(1)(h) - that he has been continuously absent from the school for a period of not less than twenty school days and (i) at no time was his absence during that period authorised by the proprietor in accordance with regulation 6(2); (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor of the school and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.

9 8(1)(i) - that he is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the pupil will return to the school at the end of that period.

10 8(1)(j) - that the pupil has died.

11 8(1)(k) - that the pupil will cease to be of compulsory school age before the school next meets and— (i) the relevant person has indicated that the pupil will cease to attend the school; or (ii) the pupil does not meet the academic entry requirements for admission to the school's sixth form.

12 8(1)(l) - in the case of a pupil at a school other than a maintained school, an Academy, a city technology college or a city college for the technology of the arts, that he has ceased to be a pupil of the school.

13 8(1)(m) - that he/she has been permanently excluded from the school.

14 8(1)(n) - where the pupil has been admitted to the school to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the school.

15 8(1)(o) where (i) the pupil is a boarder at a maintained school or an Academy; (ii) charges for board and lodging are payable by the parent of the pupil; and (iii) those charges remain unpaid by the pupil's parent at the end of the school term to which they relate

- 12.4 Schools must notify the Education Welfare Service within 5 days of any child leaving or starting school (at a non-standard transition point, eg in-year) on a weekly basis via the local authority's leavers and starters system using Excel.

Schools receive a notification each Thursday to provide information about pupils registered or deregistered in any given week. Returns are expected the following day. If no pupils have started or left school in any given week, schools must still submit a nil return. The pupil details schools are expected to provide are set out in the statutory CME guidance on page 10, paragraph 25.

Schools are also expected to notify the local authority via the same leavers and starters system about pupils subject to a reduced timetable, pupils subject to a managed move and pupils leaving post-16 education provision. These returns should be made monthly on the last Friday of each month or the nearest day, depending on term time dates.

Please direct any queries to: leaversandstarters@richmondandwandsworth.gov.uk