



FINTON HOUSE
SCHOOL

SAFEGUARDING & CHILD PROTECTION POLICY

Member(s) of staff responsible: Catherine Gomez

Date Revised: Dec 2025

Governing committee/sub-committee responsible: Safeguarding

Signature: James Vickers, Chair of Governors

Signature: Ben Freeman, Headmaster

A copy of this policy is available to all governors and parents via the School website or a hardcopy on request from the School Office. It is accessible to all staff electronically (in the Policy folder on the Staff Admin Drive) and a hardcopy held on file in the Head's Office. This policy applies to all at the School including those in Reception (the EYFS).

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Version	page	Updates
Sept 2025	all	Dates for KCSiE to 2025 Major Overhaul of policy using the The Key: Leaders model policy the Key GPT to aid with updates
Dec 2025	all	Minor technical changes (no content updates)

1. Introduction and Aims

The Governors and staff of Finton House School fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all pupils at the School. Safeguarding at Finton House is **everyone's responsibility**.

- 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
- Staff act immediately rather than wait to be told.
- Everyone who comes into contact with children and their families has a role to play.

Where a **child is suffering significant harm, or is likely to do so**, action is taken to protect the child. A referral will be made to Children's Social Care (and if appropriate the police) immediately. Action is also taken to promote the welfare of a **child in need** of additional support, even if they are not suffering harm or are at immediate risk.

If a **child is suffering or likely to suffer significant harm**, the local authority, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm. Action must be taken to *'safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, exploitation and neglect, female genital mutilation or other so-called 'honour based' violence, and extra-familial threats like radicalisation and sexual exploitation'*. (KCSiE, 2025)

A **child in need** is defined under the Children Act 1989 *'as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. 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.'* (KCSiE, 2025)

The School provides a safe, supportive, and stimulating environment that promotes the wellbeing of each pupil. All staff who work with children, including volunteers and peripatetic teachers, share the responsibility for safeguarding. They are committed to a child-centred approach, prioritising the best interests of each child, identifying concerns, sharing information, and taking prompt action. Staff are advised to maintain an "it could happen here" mindset regarding safeguarding. If staff have a concern they speak to the Designated Safeguarding Lead (DSL) or Deputy DSL. The DSL will then consider the following options.

- Managing any support for the child internally via the School's own pastoral support processes.
- An Early Help Assessment
- Or a referral for statutory services through Wandsworth Multi-Agency Safeguarding Hub, MASH (or appropriate Local Authority process)

The Designated Safeguarding Lead (DSL) and the Deputy DSLs, together with the Head, will hold a more complete safeguarding picture and are the appropriate persons to advise on safeguarding and child protection concerns. In the absence of the DSL, the Head, will cover the DSL role. There is a Governor with responsibility for Child Protection & Safeguarding and Prevent, who has DSL experience and reports termly to the Board of Governors having met with the DSL. The DSL has responsibility for online safety and is supported by the Assistant Head Technology, IT Technician and IT Governor.

All parents are informed of the School's Safeguarding & Child Protection policy and it is available on the School's website. If parents have any concerns, they should contact the DSL, Catherine Gomez or the Head, Ben Freeman. The DSL will raise child protection/safeguarding concerns with parents at the earliest appropriate opportunity.

The children are aware they can discuss concerns with any member of staff. On the School's virtual learning site, Frog there is a pastoral page in which the children can send a message to the Pastoral Team and they will respond within 24 hours during a school week. There are posters around school and a child friendly safeguarding display board that remind children who they can talk to with any worries. There is also a link to

Childline on Frog. We recognise that matters related to child protection and safeguarding are of a confidential nature. The Head or DSL will therefore share detailed information about a child with other staff members on a need to know basis only.

The School ensures that all staff and Governors receive appropriate safeguarding and child protection training (including online safety). Staff and Governors with contact with children are required to read and understand the policy together with Part One & Annex B of 'KCSiE' Sept 2025 and to be aware of their role. Those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One). They are made aware of the policies and procedures, which support safeguarding during their induction with the Deputy Head (DSL), and these include:

- Pastoral Care policy
- Anti-bullying policy
- Missing Child policy together with safeguarding response to children who go missing from education included in this policy.
- Health and Safety policy
- Positive Handling & Physical Intervention policy
- Staff Behaviours (*See Employment Handbook*)
- Staff Handbook (Section B: About the School day)
- Technology policy including Online Safety
- Staff low level concerns policy
- Whistleblowing Policy
- Child Friendly Safeguarding policy
- EYFS child friendly safeguarding policy
- The role of the DSL, which includes the identity of the DSL and the deputy DSLs.
- The referral process and Wandsworth supports systems i.e. MASH and Early Help.
- The statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or is likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All new staff are made aware that if they have any concerns they should act upon them immediately and speak to the DSL (or deputy). They are advised what to do if a child tells them he/she is being abused or neglected and how to manage the requirement to maintain an appropriate level of confidentiality. They are informed that they have a professional responsibility to share information with the DSL and with relevant agencies where necessary to safeguard and promote the welfare of children.

2. Key Internal Contacts

Contact Details:

DSL, Prevent Lead & Designated Teacher for Looked After Children	Catherine Gomez	catherine.gomez@fintonhouse.org.uk dsl@fintonhouse.org.uk	020 8682 0921 07415 876696
Head (DDSL)	Ben Freeman	ben.freeman@fintonhouse.org.uk	020 8682 0921
Deputy DSL	Susan Dalton	susan.dalton@fintonhouse.org.uk	020 8682 0921
Deputy DSL EYFS	Sasha Jones	sasha.jones@fintonhouse.org.uk	020 8682 0921
DDSL Online Safety Asst. Head: Technology	Andy Dyer	andrew.dyer@fintonhouse.org.uk	020 8682 0921

Safeguarding Governor	Flora Ellison	flora.ellison@fintonhouse.org.uk	020 8682 0921
Chair of Governors	James Vickers	james.vickers@fintonhouse.org.uk	020 8682 0921

Training Qualifications of key Staff:

Head (DDSL)	Advanced Safeguarding Training	March 2024
	Prevent	Sept 2025
	Safer Recruitment	Aug 2025
DSL	Advanced Safeguarding Training	March 2024
	Prevent	March 2025
	Safer Recruitment	March 2025
Deputy DSL	Advanced Safeguarding Training	March 2024
	Prevent	Sept 2025
Deputy DSL EYFS	Level 3 Child Protection & Safeguarding	Jan 2024
	Prevent	Sept 2025
Deputy DSL Online Safety	Advanced Certificate in Online Safety for ICT Leads	Sept 2023
Chair of Governors	Level 3 Child Protection & Safeguarding	Oct 2025
	Safer Recruitment	Apr 2025
	Managing Allegations	Apr 2025
Safeguarding Governor	Level 3 Child Protection & Safeguarding	Dec 2023
	Prevent	Sept 2024

3. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained schools governance guide](#) and [Academy trust governance guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 4).

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the '2018 Childcare Disqualification Regulations') and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

4. Definitions

Safeguarding and promoting the welfare of children means:

- 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 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 is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

The School (Finton House) is a 'relevant agency'. We have a statutory duty to co-operate and act in accordance with the published local arrangements. The School recognises its responsibilities and duties to report Child Protection concerns to Children's Social Care within Wandsworth Safeguarding Children Partnership and pays due regard to their guidance. The School assists Children's Social Care in Child Protection enquiries and in supporting 'Children in Need'. In the event of the death of a pupil, the School would follow the Wandsworth Child Death Review process. If the family is resident in another Borough we would follow their LA procedures.

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

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

5. Aims

- To raise awareness of all Staff (all adults working with children, including volunteers and peripatetic teachers) of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse or any safeguarding concerns.
- To emphasise the need for good communication between all members of staff in matters relating to child protection and safeguarding.
- To develop a structured procedure within the School, which is followed by all members of the School community in cases of suspected abuse.
- To provide a systematic means of monitoring pupils known or thought to be at risk of significant harm or where there are ongoing concerns.
- To work openly and in partnership with parents in relation to child protection/safeguarding concerns and to provide advice and connections to other professionals/agencies that can offer support, whilst acting in the best interests of the child at all times.
- To support all pupils' development in ways that will foster security, confidence and independence.
- To promote safe practice and challenge poor and unsafe practice.
- To develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children.
- To ensure that all staff are aware that children may 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. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- To ensure that all vulnerable children, including those who need a social worker and those requiring mental health support are provided with appropriate help in school to ensure their needs are identified and responded to effectively.

- To ensure that all adults working within our school have been checked as to their suitability to work with children, in line with current guidance.
- To integrate opportunities into the curriculum to teach safeguarding and for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages.
- To take account of and inform policy in related areas, such as anti-bullying, online safety, discipline and behavior, pastoral care, health and safety, missing children, child sexual exploitation, FGM, 'Honour Based' violence, serious youth violence, including knife crime, anti-radicalisation, positive handling and physical intervention procedures, procedures for dealing with allegations against staff and recruitment practice.
- To comply with the core responsibilities expected of the School as a relevant agency to the multi-agency safeguarding arrangements in Wandsworth, as set out in the Wandsworth Safeguarding Children Partnership published arrangements.

6. Key Principles and Equality

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

We believe that every child has the right to be treated as an individual, to have their needs met, and to be shown respect for all aspects of their identity, including gender, nationality, ethnic origin, religion, sexuality and culture. The ethos of the School supports open practice, good communication and a safe culture in which children can thrive and learn.

7. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Opportunities to teach safeguarding through Relationship & Sex Education (RSE) and PSHEE, which is age appropriate, inclusive and delivered regularly, tackling issues such as, for example:
 - Healthy, respectful and kind relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem

- Keeping themselves and other safe by recognising and reporting abuse
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- The systems that support safeguarding at Finton House, including this child protection and safeguarding policy, the staff code of conduct and handbook, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy (which includes our expectations, and information in relation to filtering and monitoring, the AUA and the safeguarding response to children who are missing education (see *Missing Children Policy*)
- The Early Help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

5.2 The DSL and Safeguarding Team

The DSL is a member of the SLT: Catherine Gomez - Deputy Head (Pastoral) and takes lead responsibility for child protection and wider safeguarding in the school. The DSL and deputies liaise with the three safeguarding partners and work with other agencies in line with '*Working Together to Safeguard Children*'. When necessary they will involve the police.

During term time the DSL (or a deputy) will always be available (during school hours) for staff to discuss any safeguarding concerns. The DSL or the Head are either available out of hours/out of term activities. (See Section 2 for contact details)

The DSL has the following responsibilities (see also Deputy Head Job description):

- To attend relevant training and ensure that staff are aware of issues such as child sexual exploitation, female genital mutilation, county lines, upskirting, 'honour based' abuse etc., and that staff understand the indicators and recognise the complexities of these issues for children.
- To ensure that they, Deputy DSLs and all have up to date formal and informal child protection and safeguarding training (including online safety) at the appropriate level.
- To ensure all staff, governors, volunteers (in regulated activity) are supplied with a copy of Part One and Annex B of 'KCSiE' 2025 guidance and have signed to say that they have read and understood this document. Those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One).
- To have understanding of the assessment process for providing Early Help and intervention and of how Wandsworth local authority conducts a child protection conference, a child protection review conference or death review and be able to attend and contribute to these effectively when required to do so.
- To ensure they have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority.
- To liaise with staff (especially pastoral staff, IT Technician & SENCo) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies and to act as a source of support, and advice and expertise for all staff. In addition, to support any staff who make referrals to Children's Social Care via MASH (Multi-Agency Safeguarding Hub) or to the Channel / PMAP programme (part of the prevent strategy).
- To liaise with the DDSL (EYFS) weekly and to ensure the school fulfils its duties with regards to safeguarding in the Early Years and in line with the EYFS statutory framework (Annex C)
- To recognise the additional risks that children with SEN and disabilities face online, for example, from online bullying, grooming and radicalisation and to be confident in supporting SEND children to stay safe online.
- To understand and support the School with regards to the requirements of the Prevent duty and to provide advice and support to staff on protecting children from the risk of radicalisation. To ensure that the radicalisation of visitors assessment list is updated weekly.
- Referring any concerns with regard to suspected abuse or radicalisation to the Head and where appropriate to Children's Social Care (MASH) and adult concerns over radicalisation/extremism to the Wandsworth Channel panel.
- Keeping all staff updated with current procedures, ensuring that new and temporary staff, volunteers, teacher trainees and work experience students are all familiar with child protection responsibilities.
- The DSL is responsible for online safety and understands the unique risks associated with online safety and is confident that the School has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- To take lead responsibility for oversight of checks, reports and safeguarding related actions with filtering and monitoring systems.
- To organise annual staff training on filtering and monitoring system alongside online safety.
- To monitor Smoothwall alerts and to investigate and to record action from 'danger alerts' for both children and staff.
- To update the Staff, Parent and Governor Child Protection and Safeguarding portals on Frog.
- Support the Head in dealing with low level concerns and making contact with the LADO in relation to allegations against someone working in the School and/or with police if a criminal offence is suspected.
- To refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and where a crime may have been committed to the police as required.
- Keeping detailed, accurate and secure written records of concerns and referrals on CPOMS noting discussions and decisions made, including the rationale for those decisions, to include instances when referrals were not made.
- Monitoring school attendance and keeping the Head informed. Where necessary a meeting with the parents may be held to discuss the matter.
- To be aware of the specific needs of children in need, those with special educational needs and young carers.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

- To ensure that all-relevant information about a child is disseminated to appropriate staff within the School, bearing in mind confidentiality restrictions.
- To ensure all parent readers and club peripatetic leaders have completed the online Educare modules on child protection & safeguarding and radicalisation, if they do not have a current valid training certificate (within the last 3 years). The DSL will meet with all new parent readers and any peripatetic club leader for a safeguarding briefing.
- Checking the lists termly for all child protection/safeguarding children being taught by a particular peripatetic, club, music, therapist or learning support teacher so they can be briefed where appropriate on any child protection/safeguarding issues relating to children they teach.
- Along with the Deputy DSLs to understand the relevant data protection legislation and regulations (especially the DPA 2018 and GDPR), together with the importance of information sharing e.g. within the School, other agencies, practitioners.
- When a child leaves the School ensuring that contact is made with the DSL of the new school and the completed child protection records are transferred securely to the new school. These are sent recorded delivery to the DSL of the new school, and separate from the main pupil file and confirmation that they have arrived is required. The child's local authority Education Welfare Service and Children's Social Care are informed that the child is no longer on roll. (See *Registration policy*)
- To attend termly twilight training meetings of Wandsworth Safeguarding Children Schools Partnership, to discuss child protection and safeguarding matters with colleagues and to receive training.
- To administer a Safeguarding Audit and to analyse results and to be shared with the Board of Governors.
- To ensure there is an annual review of the School's policy and the procedures and implementations are updated and reviewed regularly in liaison with the governing body. In addition, making sure it is up to date on the School website and relevant Frog portals. Plus all stakeholders are aware of the changes.
- To liaise with the Head to inform him of issues especially ongoing enquires under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to be accompanied by an Appropriate Adult. Further information can be found in the statutory guidance – PACE Code C 2019. As well as updating the Head weekly on safeguarding issues and changes.
- Chair DSL, Deputy DSLs and Head weekly meeting to discuss child concerns and updates.
- To meet weekly with the Head, Deputy DSLs (and IT Manager when appropriate) to discuss any online safety issues, new guidance, training, staff, pupils or visitors etc. As well as radicalisation risk assessment sheet for visitors and other issues/children.
- Meeting termly with the Child Protection Governor to discuss individual cases and to review policy. A report is given to the Board on the efficiency with which CP duties have been discharged. In addition, arrange a time each term for the Child Protection Governor to visit the School during the working day to talk to a number of staff to check their understanding of child protection/safeguarding matters.
- To produce a written report on Child Protection and Safeguarding each term to be discussed at the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting.
- To provide the Board with a copy of the revised policy to be signed off by the Chair of Governors at the Autumn Term Board meeting.

Deputy DSL's (DDSL) duties and responsibilities are:

(see also *Job Descriptions and Responsibilities* document):

- To be available for staff to discuss safeguarding and child protection concerns.
- To ensure all safeguarding discussions including those with pupils are recorded as soon as possible.
- To assist with the monitoring and updating the Child Protection and Safeguarding concern lists and completing the monitoring record sheet.
- To support the DSL in disseminating relevant information about pupils of concern, bearing in mind confidential restrictions and that sharing information should not stand in the way of the need to promote the welfare and protect the safety of children.
- To understand the Early Help Assessment and MASH referral systems within Wandsworth and when the DSL is not in school, support staff with any disclosure made and assist the Head in making referrals to Children's Services.
- To assist with or to deliver staff training.
- To understand and support the DSL with the requirements for the Prevent Duty and provide advice and support to staff on protecting pupils from the risk of radicalisation.

- Going through the learning support, club and music lists termly to identify Child protection children being taught by particular peripatetic, club, music, therapist or learning support teacher so they can be briefed by the DSL.
- Checking the radicalisation risk assessment of visitors to the School produced by the Office each week.
- To assist the DSL in updating the Staff and Governor Child Protection and Safeguarding portals on Frog.
- To meet weekly with the DSL
- To attend twilight training meetings of Wandsworth Safeguarding Children Schools Partnership, to discuss child protection and safeguarding matters with colleagues and to receive training.
- To attend the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting each term.

The Deputy DSL (DDSL) for EYFS duties and responsibilities are:

- To be available for EYFS staff to discuss safeguarding and child protection concerns.
- To ensure all safeguarding discussions including those with pupils are recorded as soon as possible.
- To assist with the monitoring and updating the Child Protection and Safeguarding concern lists and completing the monitoring record sheet.
- To support the DSL in disseminating relevant information about EYFS pupils of concern, bearing in mind confidential restrictions and that sharing information should not stand in the way of the need to promote the welfare and protect the safety of children.
- To ensure that the correct procedure is followed for any toileting issues with children in EYFS and where appropriate anywhere else in the School.
- To understand the Early Help Assessment and MASH referral systems within Wandsworth and when the DSL is not in school, support staff with any disclosure made and assist the Head in making referrals to Children's Services.
- To assist with or to deliver staff training.
- To understand and support the DSL with the requirements for the Prevent Duty and provide advice and support to staff on protecting pupils from the risk of radicalisation.
- Going through the learning support, club and music lists termly to identify EYFS Child protection children being taught by particular peripatetic, club, music, therapist or learning support teacher so they can be briefed by the DSL.
- To assist the DSL in updating the Staff and Governor Child Protection and Safeguarding portals on Frog.
- To meet weekly with the DSL
- To attend twice termly twilight training meetings of Wandsworth Safeguarding Children Schools Partnership, to discuss child protection and safeguarding matters with colleagues and to receive training.
- To attend the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting each term.

Assistant Head Technology has specific responsibility for online safety:

- Assisting with or the delivery of online safety staff training.
- To understand the School's filtering and monitoring processes on school devices and networks to keep pupils safe online.
- To assist the DSL in ensuring that there is online safety training for parents and children and staff (along with regular updates as necessary or appropriate).
- Along with the IT Technician to keep the DSL/Head briefed with any new risks associated with online safety and to be confident that the School has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- To keep up to date with all new online safety changes and to ensure that the DSL/Head are aware.
- To attend the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting each term.
- To attend any relevant Wandsworth (or other) online safety meetings and training.

5.3 The Governing Body

- The Governors will ensure that they comply with their duties under legislation and follow the [Charity Commission guidance on safeguarding children](#).
- They will ensure that the policies and Employment Handbook (e.g. Child Protection & Safeguarding, Staff Behaviours (section in Employment Handbook), Whistleblowing, Positive Handling & Physical Intervention, Anti-bullying, Supervision of Pupils, Acceptable use of Digital Resources, Technology & Online Safety, First Aid & Medication and Health & Safety), procedures and training are effective and comply with the law at all times and take into account the procedure and practice of the Wandsworth Safeguarding Children Partnership, Independent School Standards Regulations, ISI (Independent School Inspection) regulations and KCSiE, 2025.
- They ensure that the School contributes to the multi-agency working with Wandsworth through the effective implementation of the Child Protection policy and procedures and effective communication and good cooperation with the three safeguarding partners and local agencies through the regular attendance at meetings etc. (*See for multi-agency working statutory guidance 'Working Together to Safeguard Children, Dec 2023'*)
- The Governors recognise that all children should be protected but that some groups of children are potentially at greater risk of harm and thus ensure this is reflected in the School's policy and procedures.
- The Governors will prevent people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- The Governing body ensures that all staff undergo safeguarding and child protection training (including online safety) at induction and receive regular refresher training, at appropriate intervals, as and when required, to keep up with any relevant safeguarding and child protection developments.
- The Governing body should ensure that all governors receive appropriate safeguarding and child protection (including online safety) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- The Governing body is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing Body do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the Governing Body ensure Finton House has appropriate filters and monitoring systems in place and oversee regular reviews of their effectiveness. The Safeguarding Governor has a termly update on Smoothwall alerts and investigations from the DSL. They ensure that the Head, DSL and IT Manager staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Safeguarding governors should include filtering and monitoring in their annual audit and ensure that they are aware of any breaches or incidents from which lessons can be learnt. Measures to mitigate known risks can then be put in place.
- They feel confident that systems are in place that will identify children accessing or trying to access harmful and inappropriate content online. At the same time, they are aware that 'over blocking' can lead to unreasonable restrictions as to what children can be taught concerning online teaching and safeguarding.
- The Governors have due regard to the need to prevent people from being becoming involved with or supporting terrorism in accordance with the Counter-Terrorism and Security Act 2015. They ensure that reasonable checks are carried out with regard to extremism, on all visitors who are attending the School to work with staff and children e.g. speakers in assemblies and workshops.
- The Governors put in place appropriate safeguarding responses to children who go missing from education or who are absent, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in the future.
- The Governors ensure that the School has clear policy and procedures to minimise the risk of child on child abuse, to deal with any allegations and to support victims, perpetrator(s) and any other child affected by child on child abuse.
- The governing body ensures together with school leaders that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Also that systems in place are easily understood and accessible for children to confidently report abuse, knowing their concerns will be treated seriously and they can safely express their views and give feedback.

- The School's child protection and safeguarding policy is reviewed annually by the Board and when approved signed off by the Chair of Governors and Head. It is also available on the School's website.
- The Governors will ensure that they are aware how children are taught about safeguarding, including online safety, through the curriculum, assemblies and RSE and PSHEE. That they are also aware of school practices to help children to adjust to their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet.
- The Governors ensure there is an appropriate senior member of staff from the leadership team who is appointed to the role of Designated Safeguarding Lead. They make sure they have sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively.
- The Governors ensure that there is a member of the Governing Body who has responsibility for safeguarding/child protection and will liaise with the Local Authority on issues of child protection and in the event of an allegation of abuse being made against the Head. They also meet termly with the DSL and a detailed written report is discussed at the Safeguarding and Wellbeing Committee meeting prior to the Board meeting each term. The designated governor checks each term whether the policy in practice is being followed by questioning individual staff during their visits.
- The Governors are aware and make sure relevant staff have due regard of the processing conditions under the Data Protection Act 2018 and GDPR which includes the storage and sharing of information for safeguarding purposes including 'special category data' that allows practitioners to share information e.g. without consent, if not sharing it would place a child at risk or not providing pupil personal data when the serious harm test under legislation is met.
- The Governors will remedy any deficiencies or weaknesses concerning child protection arrangements that are brought to its attention immediately.

5.4 The Head

The Head is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable (including the EYFS)
- Overseeing the safe use of technology, mobile phones and cameras in the setting (see *Use of Mobile Devices in EYFS Policy*)

8. Information Sharing

(Read in conjunction with Data Protection Policy and sections in this policy on 'School Procedure for Suspected Child Abuse', 'Allegations against Staff or Governors' and 'Early Intervention & help' as well as KCSiE, 2025 & Chapter 1 of 'Working together to safeguard children' last updated 2024.)

KCSiE, 2025 states, 'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'

6.1 Information Sharing

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

We share information in accordance with the Data Protection Act 2018 and GDPR, including sensitive and 'special category personal data' when necessary for safeguarding purposes. We follow Wandsworth (and other local boroughs) procedures for sharing information with safeguarding partners.

6.2 When we share information:

- Regularly (**when appropriate**) with staff face-to-face, via email or at weekly staff meetings
- Proactively and early with other organisations, agencies and practitioners to identify, assess and respond to risks or concerns
- Where failure to share would place a child at risk of harm

6.3 Key principles for information sharing:

- **Be transparent** - Inform individuals and families about what will be shared and why, unless unsafe to do so
- **Seek advice if in doubt** – with due care to preserving anonymity
- **Seek consent where appropriate** - But share without consent where safety is at risk
- **Share only what's necessary** - With those who need it, ensuring information is relevant, accurate, timely and secure
- **Consider safety first** - Base decisions on the child's safety and wellbeing
- **Keep records** - Document your decision to share (or not share), what was shared, with whom and why

6.4 Retention periods:

- Sexual abuse allegations: Preserved for the term of any inquiry (IICSA)
- Allegations against staff: Retained until the accused reaches normal pensionable age or 10 years from the date of allegation (whichever is longer)

For support see [Government Data Protection Tool Kit](#)

All information is only shared by those who need to see it and when material is shared this happens in line with information sharing advice as set out in KCSiE / GDPR.

9. Record-keeping and child protection files

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

The School's Child Protection and Safeguarding software is CPOMS. All staff use this to record concerns securely and the DSL can record details of meetings and incidents.

Concerns and referrals will be kept in a separate child protection file on CPOMS for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. These staff will have enhanced permissions.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Exceptions for retaining records:

The School might keep a copy of a safeguarding file, in specific circumstances (for example):

- **Ongoing legal/investigative matters:** If the child is involved in a criminal investigation or court case.
- **Safeguarding Reviews:** If there is a pending safeguarding practice review or domestic homicide review concerning the child.
- **Complaints:** If there has been a complaint made against the school that relates to the child's safeguarding.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

10. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean ‘the DSL (or deputy DSL)’.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Any child who is suffering or likely to suffer significant harm (Wandsworth Level 4 Threshold) would be reported to Children’s Social Care immediately by the DSL through the MASH, who respond to referrals to Children’s Social care in Wandsworth. We would endeavour to complete the electronic MARF (Multi-Agency Referral Form) with the parent/carer and to get their consent.

This will then be sent to MASH within a 24-hour timeframe. However, we can proceed without parents’ consent. If parents have not been informed, or have withheld their permission, MASH will be advised that we are proceeding without parental agreement. The parent will also be contacted where appropriate and advised that after considering their wishes a referral still has been made.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Phone referrals to MASH can be made Mon-Fri, 9.00am to 5.00pm.

The *Multi-Agency Referral Form (MARF)* can be [completed online here](#):

Phone: 020 8871 6622 Out of hours: 020 8871 6000 See Appendix 4

If the child lives in another Borough, we will follow the procedures of the appropriate local authority.

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 Suspected child abuse or a child discloses

Staff members should maintain an attitude of ‘**it could happen here**’ and ‘**exercise their professional curiosity**’ where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the best interests of the child.

Staff should be aware that pupils may 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 e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

All staff have a duty to:

1. report any concerns they may have about the safety and / or well-being of pupils;
2. report any concerns they may have about the safety and / or well-being of other persons associated with the School;
3. report any safeguarding concerns about staff or anyone else associated with the School; and
4. where they make a referral directly to children’s social care, follow up on any such reports to ensure that appropriate action is or has been taken.

The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, DDSLs, any member of the SLT or directly to Children's Social Care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

What to do if staff have a concern about a pupil's welfare

- If staff have any concern about a pupil's welfare, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) immediately. (The member of staff may prefer to talk to the DSL or Deputy DSLs before having a discussion with a child, but this may not always be possible e.g. if a child reveals to a member of staff that they are being abused.)
- Any referral made will be objective and based on evidence
- The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy
- See Section 7.3 for guidance about what to do when receiving a disclosure and Appendix 5 for how to record a concern.
- A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.
- If the concern involves an allegation or concern raised about a member of staff, supply staff, contractors or volunteers, this must be reported in accordance with the procedures set out in Appendix 3 and parts 1 & 4 of KCSiE.

If the DSL or Deputy DSLs feels there is substance in the suspicions, they will discuss the matter with the Head immediately. The member of staff will also be asked to complete an incident form on CPOMS for the child (see Appendix 5)

There will be a distinction made between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. Significant harm can be caused by one traumatic event or a compilation of events that interrupt, change or damage the child's physical or psychological development. It would be necessary to consider the following, along with the [Wandsworth Level of Need Framework](#):

- The severity of ill treatment
- The degree and extent of physical harm.
- The duration and frequency of abuse and neglect.
- The extent of pre-meditation.
- The degree of threat and coercion, sadism and bizarre or unusual elements in child sexual abuse.
- If the child has suffered, or is likely to suffer from significant harm, a referral would be made immediately to Children's Social Care (and if appropriate the police).

Our prime concern at all stages will be the interest and safety of the child. Where necessary, the appropriate action will be taken to ensure the safety of the child. The law empowers anyone who has actual care of a child to do all that is reasonable in the circumstances to safeguard that child's welfare. For example, a teacher should take all reasonable steps to offer a child immediate protection from an aggressive parent.

We will carry out risk assessments (including considering contexts outside the home) where required and ensure any assessed risk is appropriately managed and key staff have been provided with the relevant information and with strategies to support safety and wellbeing of pupils and staff members. It may be that the support for the child can be provided internally via the School's pastoral support process. If the information is not shared with Children's Social Care there will be a record made on the notes stating why, and this will be signed and dated.

Where practicable and appropriate, concerns will be discussed with the child's parents. However, where this is a risk to the life of a child or a likelihood of serious immediate harm, the parents will not be informed. Parents will be asked for explanations of a suspicious injury, behaviour of child or child's allegation. These conversations will be open and honest, and the parents will be provided with reasons for concerns and required to comment on these concerns. If required, agreement will be sought for a referral to Children's Social Care unless this may put the child at further risk. Formal referrals from named professionals cannot be treated as

anonymous, so the parent will ultimately become aware of the identity of the referrer. The meeting will be led by the DSL and with either the class teacher or Head present or both.

If the child is suffering from a serious injury, medical attention would be sought immediately from A & E and Wandsworth Children's Social Care and the duty consultant paediatrician at the hospital must be informed. Except in cases where emergency treatment is needed, Children's Social Care and the police should initiate any medical examinations required as part of a child protection enquiry.

To support us in deciding what the next steps should be we might contact:

Sophie Allen, Education Safeguarding Lead

direct line: 0208 871 7961, mobile 07929 862210

email: sophie.allen@richmondandwandsworth.gov.uk.

Alternatively, contact the screening team within MASH via the telephone before submitting a formal referral.

7.3 Guidance for Staff in Dealing with a Disclosure

(See Information sharing; [*Advice for practitioners providing safeguarding services to children, young people, parents and carers – DfE*](#))

7.3.1 From a child

Staff are in a unique position to talk to the child, to help and to provide a safe haven. They are encouraged to take the issue of abuse seriously and are aware that they should not assume a colleague or another professional would take action and share information that might be critical in keeping children safe. They have a professional responsibility to share information with other relevant agencies where necessary to safeguard and promote the welfare of children immediately. (See 'Data Protection and Information Sharing' under Related Policies section.) Staff are reminded not to try to handle issues on their own. They should report them to the DSL or Deputy DSLs immediately. Staff know that they will be helped to deal with their own feelings and anxieties.

Advice on how to react when a Child wants to talk about Abuse

If a child chooses to confide in someone, it is important that the member of staff reassures them and that they will be taken seriously, what she/he is saying, even if you are finding it difficult to believe.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

General Points:

- Listen carefully to the child, being non-judgmental, clear about boundaries, advising them what will happen next and how they will be involved.
- Respect and accept what the child says. Never push for information and ask leading questions.
- Do not probe but allow the children to tell you in their own words. Use 'TED – Tell, Explain, Describe' to aid.
- Keep calm and do not show that you are shocked or upset
- Be supportive, tell the child that they have done the right thing in telling you. Do not say that they should have told you sooner.
- Never promise to keep something a secret. Tell the child sensitively that you will have to disclose the information to people who can help. Use phrases like 'some secrets are too big to keep', 'we'll have to get help to stop this happening again', or 'good secrets I can keep but bad secrets I have to pass on'.
- Whatever has happened, the child is not to blame for the abuse.

- Be aware that the child may have been threatened.
- Do not ask specific questions but in the nature of sexual assault ask 'When did it happen?' This is because forensic evidence can be collected within 7 days.

Helpful things to say:

- Tell me what has happened?
- I believe you
- I'm glad you've told me
- It's not your fault
- Is there anyone else you would like to talk to about this?

Avoid saying:

- Why did you not tell someone before?
- Did they do X to you?
- I can't believe it
- Are you sure this is true?
- Why? How? When? Who? Where?
- "I'm shocked, don't tell anyone else."

The child's wishes

- Where there is a safeguarding concern and if appropriate the child's wishes and feelings should be taken into account when determining what action is take and what service to provide.
- The child should be given the opportunity to express their views and to give feedback. Ultimately, all systems and processes would operate with the best interest of the child at heart.

At the conclusion of the talk:

- Reassure the child again that she/he was right to tell you and that you believe the story.
- Let the child know what you are going to do next and that you will let him/her know what happens.
- It is not your job to decide whether abuse has occurred, but you will need to ensure that you pass the information on to the DSL or Deputy DSLs.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

Keep a Record

(See also section on 'Information and Managing the Child Protection & Safeguarding Files.)

All staff are aware of record keeping requirements and how they are expected to record any concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing.

They make notes as soon as possible, writing down exactly what the child said and when she/he said it. The best practice is to wait until the end of the disclosure and then to immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the disclosure (especially if it is possible for a second member of staff to be present). If making notes during any disclosure, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. The notes should not reflect the personal opinion of the note taker. It is essential that a dated written record be made including date(s) and times of

meeting(s). Special provision may need to be put in place to support dialogue with pupils who have communication difficulties and one of the SENCoS should be consulted with regard to this.

All notes must be signed and dated on CPOMS, as well as read on CPOMS by the alerted DSL or Deputy DSLs. Notes from disclosures may become part of a statutory assessment by Children's Social Care and/or part of a criminal investigation.

For more guidance please see 'Working Together to Safeguard Children' – Dec 2023 and KCSiE, 2025.

7.3.2 From a member of the public

If there is telephone call or email etc., from a member of the public regarding an alleged safeguarding incident it will be fully investigated.

For example, a member of public walking their dog on Tooting Common alleges they saw a member of staff pulling a pupils' arm.

A telephone call to the School wherever possible would be referred to the DSL or Head. If they are not around then the person who takes the call needs to ask what, where and who questions to get as much information as possible. The person's contact details, telephone number (& address if possible) should always be taken so they can be contacted further if necessary by the School or by the LADO. Please refer to the section on, 'Allegations made against or Concerns raised in Relation to Staff, Volunteers, Governors, Supply Agency or Contracted Staff'.

7.4 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

Is informed by a girl under 18 that an act of FGM has been carried out on her; or

Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and should result in a child protection referral to Wandsworth Children's Social Care **AND** the local Police. Further guidance for FGM can be found as part of the London Child Protection Procedures and can be found [here](#).

7.5 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

Early Help, also known as Early Intervention, is support given to a family when a problem first emerges. It can be provided at any stage in a young person's life to parents, children or whole families and is generally supported by CSC in consultation with the family.

The school understands that providing early help is more effective in promoting the welfare of children than reacting later.

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Early Help assessments are made via the [Wandsworth Safeguarding Children Partnership's MARF](#)

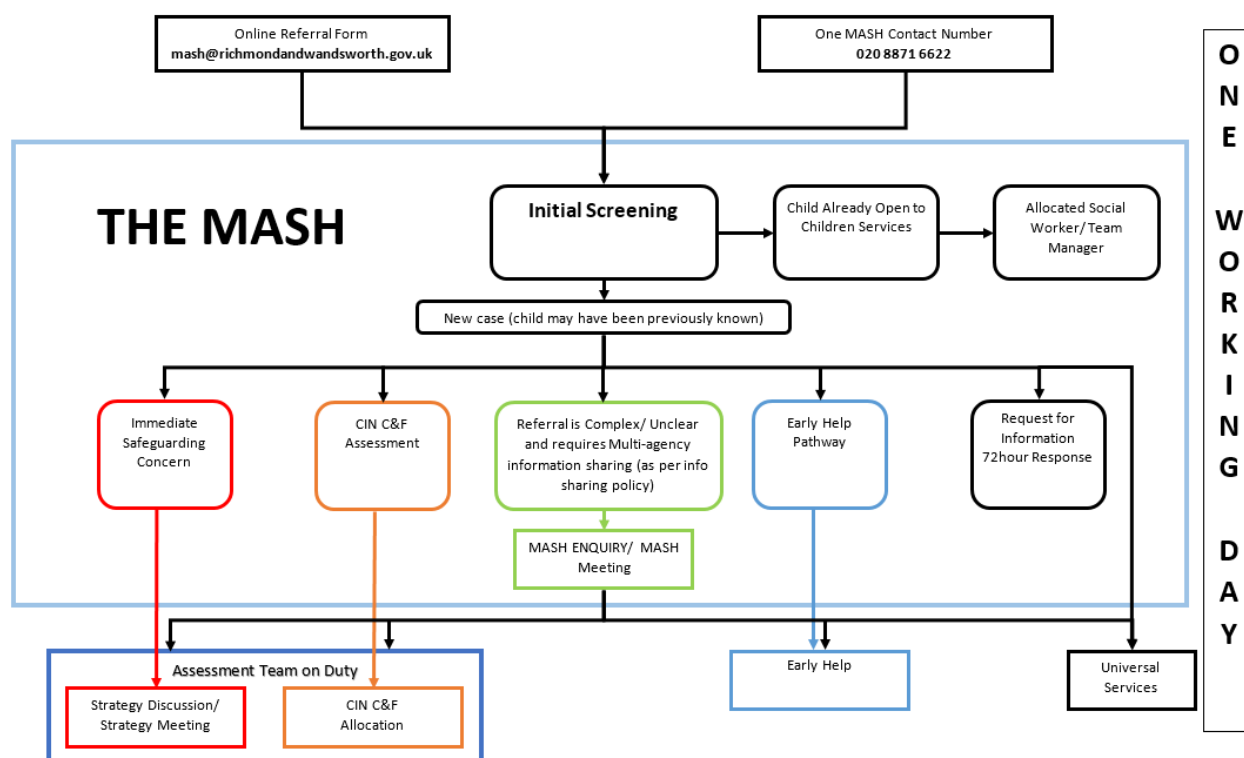
Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. Following this CSC will decide if there is an immediate safeguarding concern, which needs to go straight to a strategy discussion with key partners for a possible Section 47 or Section 17 assessment. If instead the child is a 'Child in Need', this will go straight to one of the assessment teams to undertake a Child and Family Assessment. Complex referrals, where more information is needed will be discussed within the MASH and they will then decide what level of intervention is best to help support and safeguard the child. This work will be completed within 1 working day. We would expect to be informed of the decision regarding the next steps within *24 hours* of our referral to CSC.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow [local escalation procedures](#) to ensure their concerns have been addressed and that the child's situation improves.



7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. They further understand that where a child has suffered abuse and neglect, exploitation or other potentially traumatic adverse childhood experience it can have a lasting impact throughout childhood, adolescence and into adulthood. We are aware of how these children's experiences, can impact

their mental health, behaviour and education. The high staff to pupil ratio at Finton House means staff 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 you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. (See *Mental Health & Wellbeing Policy*)

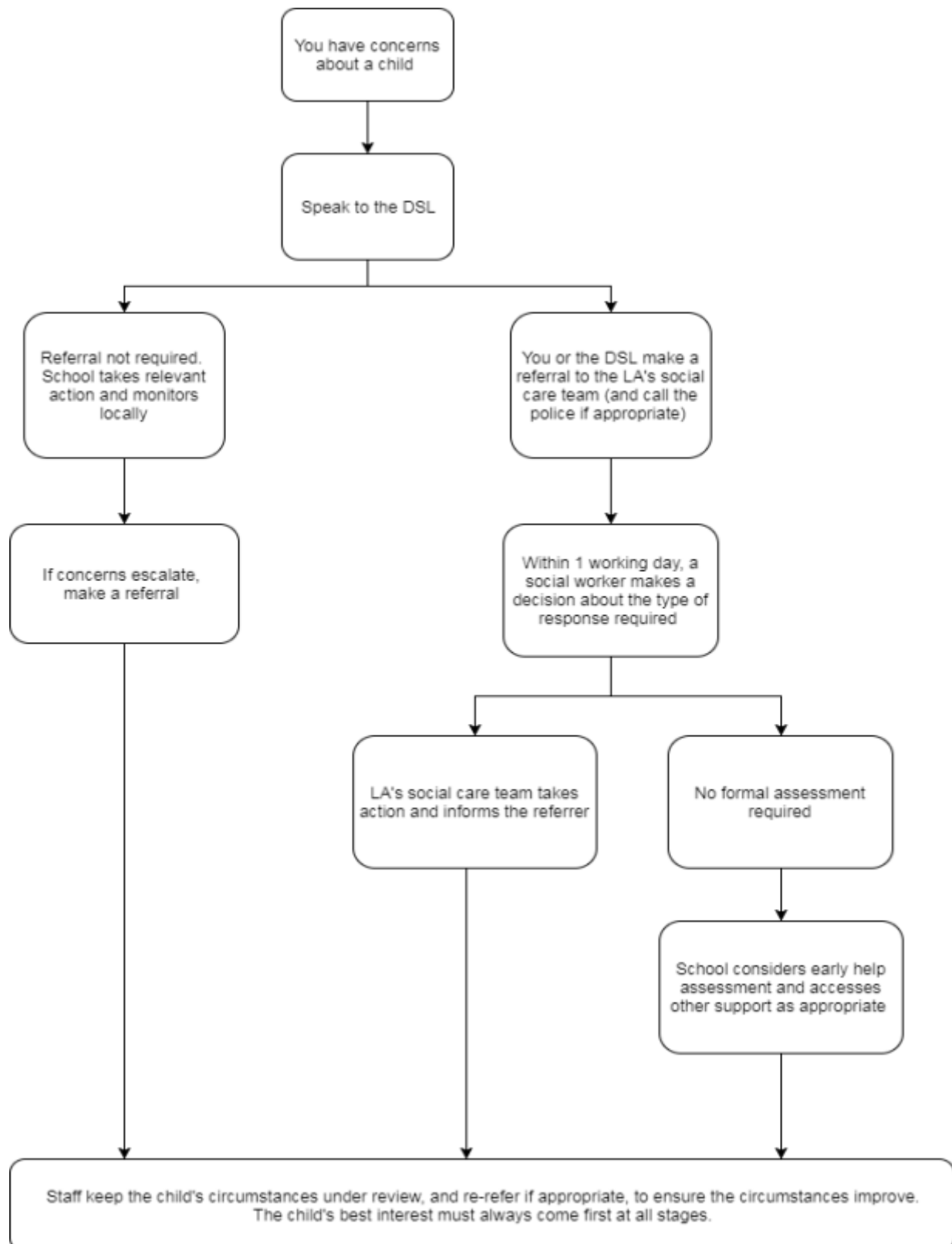
The Assistant Head - Wellbeing is the designated lead for Mental Health and attends the termly governor Pastoral sub-committee meeting. She is also a Child & Young Person Mental Health First Aider. The School recognises the role it plays in supporting them to be resilient and mentally healthy. Only appropriately trained professionals would attempt to make a diagnosis of a mental health problem. We ensure that families have information and support, and where severe problems occur will ensure that appropriate referrals are made (with consent) to specialist services e.g. Child and Adolescent and Mental Health Services (CAMHS). We also recognise that some children are more at risk of developing mental health problems than others. Nicola Blenkinsopp (SENCO) has an Extramural certificate in counselling skills and there are two highly qualified peripatetic school counsellors working at the School.

We offer a range of support, which includes bereavement support, counselling, social play groups, Mindfulness, Y5/Y6 Mentoring groups and The Zones of Regulation. We are aware of the DfE's latest advice in [SEND Code](#), and the [Mental Health and Behaviour in schools Guidance](#).

We recognise that staff working in the School who have been dealing with child protection issues may find the situation stressful and upsetting. We ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have. In the Early Years Foundation Stage (EYFS) regular formal supervision is provided. Access to [SPILL](#) is available for the DSLs and SENCo and any other staff members as appropriate. All employees have access to the [Health Assured Employee Assistance Programme](#) Tel: 0800 030 5182.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.6 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, make a report on CPOMS StaffSafe or speak to the Head as soon as possible. If the concerns/allegations are about the Head, speak to the chair of governors.

The Head/Chair of Governors will then follow the procedures set out in Appendix 3, if appropriate.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head as soon as possible. If the concerns/allegations are about the Head, speak to the proprietor.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Head, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

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

You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

1. Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
2. Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
3. Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
4. Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
5. Ensure staff reassure victims that they are being taken seriously
6. Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
7. Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
8. Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
9. Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action. (see *Anti-Bullying Policy*; *Pastoral Care Policy*)

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.8 Sharing of nudes and semi-nudes ('sexting')

The School's policy for dealing with the an incident is in line with the suggested approach based on [guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology](#).

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Head and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done by dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils of an appropriate age are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE, PSHEE and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
 - Specific requests or pressure to provide (or forward) such images
 - The receipt of such images

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

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

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

7.9 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Finton House has a culture of openness and staff are very accessible and approachable. There is provision in place for children to feel able to discuss any concerns within a group or 1:1. For example:

- Child-friendly Safeguarding Policy
- Social Groups & Y5/Y6 Mentoring Groups
- ELSA
- School counsellors
- Listening buddies
- A direct email link to the Pastoral team on Frog.
- Pupils' Council

Pupils are signposted to these in Assemblies, by class teachers, through posters and in RSE/PSHEE lessons.

11. Online Safety and the use of mobile technology

For more information see: *Technology Policy including Online Safety; Use of Mobile Devices in the EYFS policy*

Technology Policy Including Online Safety

The use of technology has become a significant component of many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. E.g. child sexual exploitation, radicalisation and sexual predation. Technology can often provide the platform that facilitates harm.

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

- **Content:** being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact:** being subjected to harmful online interaction with other users; for example child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving or explicit images. For example, consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images (including computer-generated imagery) and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If our pupils or staff were at risk we would report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The school carries out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks that children face. Online safety is also formally reviewed at the start of each term with the IT Technician, Head and DSL team and whenever it is necessary to do so.

All new members of staff and governors sign an Acceptable Use Agreement (AUA) prior to accessing the School's technology. No staff and visitors including those working with EYFS children are allowed to use personal mobiles, iPads, cameras, for recording or taking photos of children etc. Personal devices are only allowed to be used in an office, staffroom or out of sight of the children. Parents are only allowed to use personal devices to take photos or to film a performance for their own personal use. All of the children have either signed (Upper School) or had shared (Lower School) with them the Acceptable Use Agreement, which includes remote learning/online home working. All AUAs were last reviewed, revised and signed Sept 2025.

All parents are sent the 'Images of Children Policy' when their child joins and electronically sign a parents' permission slip saying they have read the policy as well as indicating whether they agree to their child's photo being used for internal, external or social media use. Parent communications (e.g. introductory evenings, Frog Parent dashboard updates and weekly newsletters) are used to reinforce the importance of children being safe online (when away from school) and parents and carers are informed about the IT system at school that is used to filter and monitor online use.

Children are not permitted to use mobile phones in school. However, Year 6 pupils may bring a 'brick' phone (not a smartphone) to school for use when travelling home unaccompanied. Phones must be switched off and handed into the office on arrival, then collected at the end of the day. Parents must complete a 'Year 6 Travelling to and from School' form.

12. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with their parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

13. Children with Special Educational Needs, Disabilities or Health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer additional pastoral support for these pupils which includes:

- SEMH sessions with a trained member of staff
- ELSA sessions by trained practitioners
- Developing communication using tools such as Widget

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

14. Children with a Social Worker

Children may have a social worker due to safeguarding or welfare needs. They may need help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

The local authority informs the School if the child has a social worker and information would be shared between the two in order to fully safeguard and promote the welfare of the child. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

15. Looked-after and previously looked-after children

Looked After Children

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

Catherine Gomez, who is the lead DSL and Deputy Head, is the designated teacher to promote the educational achievement of children who are looked after and she will work closely with other agencies. We recognise that the most common reason for children becoming looked after is abuse and/or neglect. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- We work quickly and effectively to identify any safeguarding concerns regarding looked-after and previously looked-after children.

As the designated teacher is the DSL, she will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. Advice and support is available from Nova Levine, nova.levine@richmondandwandsworth.gov.uk 020 8871 7351 or mobile: 07557 295630.

If a close relative is looking after a child, e.g., aunt they are deemed close relatives in law and there is no need to notify the local authority. However, the School would need to know who to contact in the event of an emergency. If parents hand that responsibility over to the close relative then the School would require that in writing.

Private fostering

Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'.

A connected person is defined as a 'relative, friend or other person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child, for example, a teacher who knows the child in a professional capacity.

Private foster carers can be from the extended family, e.g. a cousin or a great aunt, but cannot be a relative as defined under the Children Act 1989, section 105:

'A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.

The local authority are notified if a child is living with someone who is not his or her parent or a 'connected person' for longer than 28 days. We would notify MASH if a child were being privately fostered. The local authority would need to be satisfied that the placement is suitable and the child is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks. For advice about private fostering, contact Specialist Private Fostering Senior Social Worker (Beatrice Ogunbowale - 020 8871 6471, Beatrice.ogunbowale@richmondandwandsworth.gov.uk)

16. Children who are Lesbian, Gay, Bisexual or Gender Questioning

The section of KCSIE, 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published. This section will be updated once government guidance has been received.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our *Anti-Bullying and Pastoral Care policies* for more detail on how we prevent bullying based on gender or sexuality.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff. It is therefore vital that staff at Finton endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff through promoting the **Who Can Help Me? Posters** around school. LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and assemblies are used with resources that help counter homophobic, biphobic and transphobic bullying and abuse.

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

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

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

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying. We will refer to Department for Education guidance when deciding how to proceed [Note: at the time of publication of this policy, DfE guidance is pending].

(Please read Mental Health and Wellbeing policy for more details.)

17. Children's Toileting Arrangements

Procedures to be followed when a child has wet or soiled itself:

- There needs to be two members of staff present when changing a child unless there is a designated member of staff approved by parents to do this on a toileting plan.
- Staff should wear gloves and apron stored in the first aid cupboard over the yellow first aid bin in 171 or the changing cupboard in Reception.

- Encourage children to remove their own clothing.
- Encourage the child to wipe itself independently. Wipes may be supplied by a parent or wet wipe used from the 171 first aid cupboard or the Reception cupboard.
- Soiled clothes to go in a plastic bag for the child to take home.
- Replace any soiled clothes with ones from those stored lost property cupboard or the Reception changing cupboard.
- All staff to wash their hands before and after every change and to dispose of gloves and aprons in the yellow bin on the ground floor of 171.
- Incident recorded on toileting record sheet in Child Protection and Safeguarding folder on W drive. When recording it is vital to recognise if any patterns of accidents occur to put intervention in place.
- If the child has soiled itself, parents will be informed immediately and asked to be picked up depending on the state of the child.
- If the child has wet itself, they will be changed at school and the parents will be informed at pick up.

A care plan will be drawn up and agreed with parents for all children who require intimate care on a regular basis, for example with toileting or removing wet/soiled clothing. Two adults will always be present when removing wet/soiled clothing from a child (this is always the case in EYFS). Please see *Toileting Care Plan* for detailed procedures and children's individual Healthcare plans. Advice can be sought from the Deputy DSL for EYFS.

18. Children who are absent from education

Read in conjunction with 'Children missing education: statutory guidance for local authorities' updated Sept 2025, DfE', the Education Act, 1996 (Section7) and the Registration & Attendance policy.

All children regardless of their circumstances are entitled to a full-time education, which is suitable to their age, ability and aptitude, and any special educational needs they may have. Children missing from education, particularly persistently, can be a warning sign for a range of safeguarding issues. We are also aware that it is important to act when problems are first emerging. Wherever possible we hold more than one emergency contact number for each child plus that of their parent(s)/carer.

Children who are of particular risk are:

- Children at risk of abuse, exploitation and neglect – this may include sexual abuse or sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems and risks of substance abuse, travelling to conflict zones, female genital mutilation and risk of forced marriage.
- Children of Gypsy, Roma and Traveller (GRT) families
- Children of Service Personnel
- Missing children and runaways
- Children who cease to attend a school
- Children of new migrant families
- Children supervised by the Youth Justice System

A child going missing from education, or not attending regularly is a potential indicator of abuse or neglect. These are children:

- Who are not present for registration and the School Office or Class Teacher has received no message.
- Who suddenly leave the School with either a few days' notice or no notice at all.
- Who are unexplainably and/or persistently absent from education
- With unauthorised absences e.g. holidays during term time.

The Registrar fulfills our legal duty to report certain attendance issues to the child's local authority of residence when a child's name is to be removed from the admission register at a non-standard transition point. This duty does not apply at standard transition points – where the child has completed the School's final year. Examples of non-standard transition points when a child is deleted from the School's admission register are:

- When a child leaves the School at a non-standard transition point i.e. before the end of Year 6.

- The child has been continuously absent from school for a period of not less than twenty school days and the absence was unauthorised.
- When the child has been permanently excluded from the School. The School would arrange full-time education for excluded pupils from the sixth school day of a fixed period of exclusion.
- The child can no longer attend the School as they do not meet the academic level or the School can no longer meet their special educational or medical needs.
- Failure to attend regularly.
- Child was entered on the admission register but failed to attend the School.
- When the next school is not known.
- When a child has been taken out of school to be home educated.
- When the family has apparently moved away.
- When the child has been certified as medically unfit to attend. The GP has certified that they are unlikely to be in a fit state of health to attend school before ceasing of the School age range.
- Are in custody for a period of more than four months due to a final court order and the Governors do not reasonably believe they will be returning to the School at the end of that period.

The Registrar electronically completes a leaver or starter form to the Local Authority Education Welfare Service every week, showing if any child has been registered or de-registered that week. This duty does not apply when a pupil joins or leaves the School at a standard transition point e.g. in Reception or Year 6.

The child's name may be removed from the admission register under any of the fifteen grounds set out in the regulations. See '*Children missing education – Statutory guidance for local authorities - Annex A: Grounds for deleting a pupil from the School admission register*' - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

We would also notify the local authority within five days of adding a child's name to the admission register at a non-standard transition point.

** Notification to the local authority includes: full name of the child, name, address and telephone number of parent and the child's future address and destination together with new school details and expected start date, if applicable, and the grounds in regulation 8 under which the child's name is to be removed from the admission register – see Annex A: Children missing in education: statutory guidance for local authorities Sept 2016.*

Going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect. We ensure staff are alerted to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as travelling to war zones, sexual abuse or exploitation, child criminal exploitation, mental health problems, FGM and forced marriage. Parents are aware of procedures with regard to informing the School of any absences.

For Full School Procedure please see: *Attendance & Registration Policy*

19. Training of Staff and Governors

17.1 All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually, through emails, e-bulletins and in staff meetings.

Volunteers, including parent readers, will receive appropriate training.

17.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

17.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head, they receive training in managing allegations for this purpose.

17.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

17.5 Staff in Early Years (Reception)

All Early Years staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

The Head will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing. Refer to Annex C of the EYFS statutory framework.

20. Monitoring arrangements

This policy will be reviewed **termly** by the DSL: Catherine Gomez. At every review, it will be approved by the full governing board during the Autumn Term Full Board meeting.

21. Links with other policies

- This policy links to the following policies and procedures:
- Anti-Bullying
- Pastoral Care Policy
- Positive Mental Health & Wellbeing
- Staff Handbook (inc Code of Conduct)
- Children with SEND
- Complaints
- Health and safety
- Inclusion
- Registration & Attendance
- Technology Policy including Online safety
- AI
- Use of Mobile Devices in EYFS
- DEIB
- Relationships and sex education
- First aid & Medication (inc. Early Years)
- Curriculum
- Whistleblowing Policy

22. Appendices

Appendix 1: Types of abuse

This appendix is based on the Department for Education's statutory guidance, Keeping Children Safe in Education, 2025.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse:

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Some of the following signs may be indicators of physical abuse:

- Unexplained injuries e.g. eye injuries, cuts, split lips, swollen pelvis, hair pulled out etc., any injuries not consistent with the explanation given for them or several different explanations provided for an injury.
- Bruising in the following areas: around the mouth, two simultaneous bruised eyes, multiple bruising to the head or face, outlines of objects such as hair brush, belt marks etc., bruising or tears around the earlobe/s indicating injury by pulling or twisting, bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.
- Bite marks - these leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.
- Burns or scalds – it is difficult to distinguish between accidental and non-accidental. Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods, iron or electrical fire elements and burns of uniform depth over a large area.
- Fractures may cause pain, swelling and discolouration over a bone or joint.
- Scars of different sizes or ages on different parts of the body may suggest abuse.
- The parents or carers are uninterested or undisturbed by an accident or injury.
- Family use of different doctors and A & E departments.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Injuries that occur to the body in places that are not normally exposed to falls and rough games.
- Injuries that have not received medical attention.
- Instances where children are kept away from the group or school inappropriately.
- Reluctance to change for, or participate in, games or swimming.
- Refusal to discuss injuries.
- Fear of medical help.
- Self-destructive tendencies.
- Aggression towards others.
- Changes or regression in mood or behaviour particularly where a child withdraws or becomes clinging.

Emotional abuse:

Is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Some of the following signs may be indicators of emotional abuse:

Emotional abuse may be difficult to recognise because the signs are usually behavioural rather than physical. The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should be aware that emotional abuse might also signify the presence of other kinds of abuse.

- Developmental delay
- Children who are excessively withdrawn, fearful, or anxious about doing something wrong.
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'.
- Parents or carers blaming their problems on their child, and who humiliate their child, for example, by name-calling or making negative comparisons.
- Over-reaction to mistakes
- Continual self-deprecation
- Appeasing behaviour towards others
- Withdrawn or seen as a 'loner' – difficulty relating to others.
- Sudden speech disorders
- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging and finds it difficult to relate to others.
- Nervousness, frozen watchfulness.
- Sudden under-achievement, lack of concentration, low self-esteem or lack of confidence.
- Inappropriate relationships with peers and/or adults.
- Aggressive behaviour towards others.
- Neurotic behaviour (for example rocking, hair twisting, excessive thumb sucking).
- Self-mutilation.
- Attention seeking behaviour.
- Running away/stealing/lying.
- Fear of parents being contacted.
- Persistent tiredness

Sexual abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Some of the following signs may be indicators of sexual abuse:

Recognising sexual abuse can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional and behavioural. Boys and girls of any age may be sexually abused and are often scared to say anything due to fear and/or guilt. It is particularly difficult for a child to talk about their sexual abuse. Disclosure can often initially be indirect as the child tests the professional's response.

- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in sexual play or conversation inappropriate to his/her age group.
- Self-harm (including eating disorders), self-mutilation or suicide attempts.
- Pain or itching of genital area or blood on underclothes.
- Physical symptoms such as injuries to the genital or anal area; bruising to buttocks, abdomen and thighs; sexually transmitted disease; presence of semen on vagina, anus, external genitalia or clothing.
- Bloodstains on underwear.
- Sexual activity through words, play, drawing or inappropriate masturbation.
- Child who is sexually provocative or seductive with adults.
- Extreme shyness about changing in front of peers or adults for swimming or games.
- Parents may ask staff not to undress or change their child.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations.

Behaviour indicative of excess adult responsibilities at home - for example a girl who takes over the mothering role/wifely responsibilities, whether or not the mother lives there.

Neglect:

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Some of the following signs may be indicators of neglect:

- Evidence of neglect is built up over a period and can cover different aspects of parenting.
- Provide adequate food and clothing
- Children who are living in a home that is indisputably dirty or unsafe.
- Poor personal hygiene and health care
- Provide shelter including exclusion from home and abandonment.
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence.
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause.
- Children who are often angry, aggressive or self-harm.
- Emaciation
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child feeling unloved and insecure.
- Child thrives away from home environment.
- Frequent lateness or non-attendance at school
- Parents who fail to seek medical treatment when their children are ill or are injured.
- Destructive tendencies
- Low self-esteem
- Poor social relationships
- Running away
- Child left with inappropriate carers e.g. too young or complete strangers.
- Child left alone with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

NOTE: It is important that not all the above signs be taken as indicating that abuse has definitely taken place, but that the possibility should be considered far more than in the past. Such signs should make us stop and think - not jump to conclusions inappropriately

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps below are based on Part 3 of KCSiE (2025) and includes the requirements for safer recruitment contained in The Early Years Foundation Stage statutory framework (2025).

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Further details of FHS safer recruitment procedures can be found in the [Recruitment, Selection & Disclosures Policy](#).

Advertising

When advertising roles, we will make clear:

Our school's commitment to safeguarding and promoting the welfare of children

That safeguarding checks will be undertaken

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- If they are known to the policy and children's local authority social care and
- If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references (e.g. 'to whom it may concern')
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Head as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed

Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

Explore any potential areas of concern to determine the candidate's suitability to work with children

Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

Verify their identity

Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

Require all new staff to enroll on the DBS update service

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

There are concerns about an existing member of staff's suitability to work with children; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

We believe the individual has engaged in [relevant conduct](#); or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

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

Trainee/student teachers

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

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

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

Volunteers

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Obtain references for volunteers before they are recruited

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

Governors

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

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

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Appendix 3: Allegations of abuse made against staff including low-level concerns

Section 1: allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of KCSiE (2025) and applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

We expect any member of staff, supply/agency or contracted staff or volunteer who is concerned about the behaviour or presentation of a colleague, or sees an incident, which concerns them, to discuss this as soon as possible with the Head or as a confidential note on CPOMS StaffSafe. If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

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

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's Head of HR and the LADO, as well as the police and local authority children's social care where they have been involved.

Where the School is not the employer of an individual we still have responsibility to ensure allegations are dealt with appropriately and will liaise with relevant parties (this includes supply teachers and volunteers).

The majority of allegations against staff, volunteers, supply/agency or contracted staff or Governors relate to their behaviour in the workplace. However, some concerns may relate to their personal life or the care of their own children. In some cases, there may have been an allegation of abuse against someone closely associated to them and this person may pose a risk of harm to the children, the staff member or volunteer.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the School is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Supporting those involved

The welfare of the child will be paramount and this will be our prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. The School will offer appropriate welfare support and recognises the sensitivity of the situation. Information will not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

The School will do what they can to manage and minimise the stress caused by the allegation and will:

- Inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary.
- Advise the individual to contact their trade union representative, or a nominated colleague for support.
- Appoint a named representative to keep the person informed about progress of the case.
- Provide access to counselling or medical advice where appropriate through Health Assured, 0800 030 5182 or via www.healthassured.org
- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved will be:

- Formally told about the allegation as soon as possible. The Case Manager should consult the LADO and where involved Children's Social Care and/or the police on what information can be disclosed.
- Kept informed about the progress of the case, only in relation to their child. However, limited information subject to privacy requirements might be shared with regard to the staff member e.g. suspension, working at home etc.
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.

Timescales

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

It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months. For all cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week.

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Any details of allegations that are found to have been false, unsubstantiated or malicious will be removed from personnel records and not included in employer references. This includes repeated concerns or allegations, which have all been found to be false, unsubstantiated or malicious.

Confidentiality and information sharing

The Education Act of 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school

(where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with the offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegations. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so if a judge lifts restrictions in response to request to do so. In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless the person is charged with a criminal offence.

The Head or Chair of Governors would take advice from the designated officer(s), police and Children's Social Care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest when it should arise.

Record-keeping

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

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

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

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

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

Issues arising from the decision to suspend the member of staff

The duration of the suspension

Whether or not the suspension was justified

The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

This section is based on 'Section 2: Concerns that do not meet the harm threshold' in Part 4 of KCSiE 2025.

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

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

Responding to low-level concerns

If the concern is raised via a third party or CPOMS StaffSafe, the Head will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Head will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's *Employment Handbook Section 10.1.1*. The Head will be the ultimate decision-

maker in respect of all low-level concerns, though they may wish to collaborate with the DSL and the Head of HR.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

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

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on Annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children missing from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

For children under the age of 5, if a pupil is absent for a prolonged period of time or if a child is absent without notification from parents, attempts will be made to contact the child's parents or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgment when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parents/carers vulnerability and their home life. Any concerns will be referred to the relevant children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an

exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

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 are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. (*KCSIE, 2025*)

Children can be targeted and recruited into county lines in a number of locations including schools. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked

off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

- Go missing and are subsequently found in areas away from their home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- 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: [*Criminal exploitation of children and vulnerable adults: county lines*](#)

And the [*Child Exploitation disruption toolkit*](#) published by the Home Office.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. See [Operation Encompass](#) for further information.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate make a referral to the Children's Services MASH team on 020 8871 6622 or mash@wandsworth.gov.uk
- Seek advice from the Community Safety Division on 020 8871 6437
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate
- In emergencies, dial 999
- Further local information is available [in this leaflet](#)

Preventing radicalisation

(Please see Appendix 6 for risk assessment for children being subject to radicalisation, and/or becoming involved with or supporting terrorism/extremist activity.)

Children are vulnerable to extremist ideology and radicalisation. We are subject to a duty under section 26 of the Counter-Terrorism and Security Act of 2015 ("the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from becoming involved with or supporting terrorism". This duty is known as the Prevent Duty and the School supports the Prevent Strategy, which works to prevent the growth of issues that create a climate which encourage radicalisation and extremism, which in turn can lead to acts of violence or terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

For more information see: [Revised Prevent duty guidance: for England and Wales](#)

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). Any concerns should be raised with the DSL (or deputies) or if an adult, the Head or Bursar who is the Whistleblowing Officer (see Whistleblowing policy for staff)

Staff should be alert to changes in pupil's behaviour and to those going through a difficult time for example:

- Finding it hard at school
- Finding it difficult to make friends

- Grieving the loss of a loved one
- Feeling confused about their religious views
- Serving time in prison (or a close relative in prison).

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL who is also the Prevent Lead.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in the risk assessment.

Finton House teaches a broad and balanced curriculum, which promotes the spiritual, moral, cultural, mental and physical development of children and prepares them for the opportunities, responsibilities and experience of life. Finton House has an environment in which children feel safe to discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. We are an inclusive school, which values citizenship and a sense of belonging. Children are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others. Please also read the RSE / PSHEE, Religious Education and Early Years policy.

For more details, please see: *Technology Policy including Online Safety*.

As with all matters pertaining to the maintenance of a safeguarding culture within the School, staff are expected to display professional curiosity and be vigilant in identifying concerns, and ensuring these are passed to the DSL or Deputy DSLs immediately. If there are any concerns regarding a member of staff procedures outlined in the *Whistleblowing policy* should be followed.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to extremist ideology and radicalisation and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2021) The DfE and Home Office's briefing note [The use of social media for online radicalisation](#) (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

The DSL will consider if it would be appropriate to share any information with the new school in advance of the child leaving.

Other useful information:

- [CEOP](#)
- Online material promoting terrorism or extremism can be reported anonymously [here](#)

- The UK Safer Internet Centre has a [Professionals Online Safety Helpline](#) Tel: 0344 381 4772
- Non-emergency advice is available from the DfE dedicated helpline Tel: 020 7340 7264 and [mailbox](#) for non-emergency advice.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Child abduction and community safety incidents

Police-recorded offences of abduction have double in just five years in England and Wales (1,000 cases in 2020).

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. (KCSiE, 2025)

Community safety incidents near the School would raise concerns such as someone loitering nearby or unknown adults engaging children in conversation.

Lessons are focused on building children's confidence and abilities and not simply warning them about strangers. For example children walking home on their own i.e. Year 6. Year 6 are provided with practical advice on how to keep safe through workshops to prepare them for secondary transfer.

Useful resources: <http://www.actionagainstabduction.org/> & <https://clevernevergoes.org/>

Non-collection of children

If a child is not collected at the end of the session/day, we will:

Follow the: *Uncollected Children Policy*

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Follow the: *Missing Child Policy*

Appendix 5: Reporting a Child Protection/Safeguarding Concern via CPOMS

A Referral to Designated Safeguarding Lead for Child Protection/Safeguarding Concerns reporting via CPOMS

Finton House uses CPOMs to record, track and monitor safeguarding concerns. If you become aware of Safeguarding concerns this must be reported and recorded, in accordance with government guidance and the child protection policy.

All child protection concerns MUST be raised in person in addition to recording them.

Allegations against staff should be made directly to the Head and using CPOMS StaffSafe for a low level concern.

The DSL will monitor child concerns and report where appropriate to Children's Social Care if a child is deemed at risk of significant harm. This information will be disclosed only to those staff who need to know for the purposes of child protection.

How to record a safeguarding concern:

1. Log onto CPOMS from Finton House dashboard
2. To add a new incident to the system click on the 'Add Incident' link at the top of your screen.
3. This will take you to the incident page where you can proceed to fill in all the required information.
4. Select the child to whom you want to add the incident by beginning to type the name in the student box at the top of the page. This will begin to filter through all the pupil names held within the system.
- 5 Once you have selected a name, the box will turn grey.
6. Fill in the incident text box with all of the details about the incident which you are adding. This is a free text box so you can add as much or as little as needed. Be careful to be accurate and specific.

Consider the following:

- ☐ Write the incident as a statement of events, not as an email or letter addressed to anyone
- ☐ Include any actions you have taken or will take, e.g call home or speak to the student if appropriate
- ☐ Don't direct staff members to take any specific actions- these will be recorded and actioned by the DSL/Deputy DSL.

7. After you have filled in all of the details of the incident you need to select at least one category to assign it to (if there is an overlap you can select more than one). The DSL and Deputy can re-categorise incidents if needed.

8. You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all pupils selected. You can also click to monitor the linked student under the same category, if necessary, and also share any documents attached to the incident.

9. The 'Body map' feature allows you to apply numbered markers to a body map image to support your incident text. Describe the marks in the text box indicating which number on the body map the mark refers to.

10. Following this you can select a time and date. These will both default to the current time and date you are adding the incident, however if you wish to change it to when the incident actually occurred you can do so here.

11. Next, you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members. Alert DSL / Head to all incidents.

12. If you would like to attach a document to support the incident e.g. a social services letter, previous school case notes, or meeting minutes etc. you can do so at this point. Simply click to browse and find the relevant document on your pc and add as you would an email attachment, or drag a file from one of your folders to upload.

13. Next, you can add any agency names to the incident to make others aware of which agencies are involved with this pupil.

14. Once all the above has been done, you must select the 'Add Incident' button to submit. This will then send out email alerts to all of the selected staff members telling them that they need to log in to CPOMS to look at a newly added incident.

Appendix 6: Radicalisation Risk Assessment

We consider the risk at Finton House to be low due to the age range of the children, the catchment area and the social-economic demographics of our school group.

Completed by: DSL Team

Date: May 2021

RISK	POTENTIAL HARM	RISK: High, medium, low	PREVENTION	ANY FURTHER ACTION REQUIRED
Radicalisation of parents.	Risk of radicalisation by an extremist organisation, family member or friend.	Likelihood low Severity high	CT/staff are proactive in noticing any changes in parent behaviour.	To inform DSL and a referral if necessary is made to MASH for children and via Channel for adults i.e. Any concerns over adults can be made to the Wandsworth Community Safety Unit (CSU) Phone: 020 3276 2610, Communitysafetyunit-ww@met.police.uk . The local police force non-emergency number for advice is 101 and in an emergency use 999 or 112 - Wandsworth Police Station, 146 Wandsworth High Street, London SW18 4JJ - www.content.met.police/UK/Home . The CSU details are prominently displayed in the staffroom. CEOP may also be contacted http://www.ceop.gov.uk . Non-emergency advice is available from the DfE dedicated helpline and mailbox for non-emergency advice: 020 7340 7264 and counter.extremism@education.gov.uk Safeguarding Governor to be briefed and Chair of Governors and reported in termly report to Governors.
Radicalisation of pupils or staff through on-line grooming, social media, contacts etc.	Risk of online radicalisation e.g. through a terrorist organisations such as ISI seeking to radicalise people with social media and the Internet.	Likelihood low Severity medium	Filters in place on internet via Smoothwall.	To inform DSL, Head, & IT Technician. They will lead the initial internal investigation and parents of the child will be informed and advised of action. For staff the Head or Chair of Governors (if incident involves the Head) would consult the LADO and contact Anita Gibbons. LADO, Designated Officer (day to day LADO work) 07974 586461. Anita.Gibbons@richmondandwandsworth.gov.uk For pupils a referral would be made to MASH or Early Help depending on the severity. A simultaneous referral may be made to Channel as well.
Recruiting someone with extremist views.	Possibility that they might be susceptible to being radicalised.	Medium	Specific questions asked at interview linked to extremism and in identifying candidate's character/interests. Recruitment checks	Any serious concerns would be passed on to the Wandsworth Community Safety Unit (CSU) Phone: 020 3276 2610, Communitysafetyunit-ww@met.police.uk . The local police force non-emergency number for advice is 101 and in an emergency use 999 or 112 - Wandsworth Police Station, 146 Wandsworth High Street, London SW18 4JJ - www.content.met.police/UK/Home .

Staff who are not confident about the School procedure for handling concerns/or do not feel comfortable sharing issues internally.	Those that have extremist views etc. are not identified and interventions put in place.	Likelihood low Severity medium	<p>Children are taught the risks to which they may be exposed while online e.g., being exposed to extremist views/doctrines etc. If children come across inappropriate material, they will switch off the monitor and are told to report the incident to the nearest member of staff. They will deal with it according to the School's code of conduct. Online safety lessons form part of the Computing curriculum, highlighting safety on the Internet.</p> <p>Any adult in the School having access to technology signs the relevant AUA Acceptable Use , which states that they have a duty under section 26 of the Counter-Terrorism and Security Act of 2015 ("the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent staff/pupils from becoming involved with or supporting terrorism".</p> <p>There is a Whistleblowing policy for staff to follow if they have a concern regarding a colleague. All staff receive training every three years and have CP/Safeguarding induction training on arrival at FH e.g. Staff meetings, online training via Educare, which includes Radicalisation training. Staff are aware that they can make a direct referral to Children's Social Care - MASH for a Child:</p> <p><i>Referrals to MASH can be made by Mon-Fri, 9.00am to 5.00pm.</i></p> <p><i>Email: MASH @wandsworth.gov.uk</i></p> <p><i>Phone: 020 8871 6622</i></p> <p><i>Out of hours: 020 8871 6000</i></p> <p><i>CSU: 020 3276 2610</i></p> <p>Details are in CP/Safeguarding policy and on Staff board in staffroom together with radicalisation disclosures contacts.</p> <p>DSL & Deputy DSLs attend regular meetings with members of Wandsworth CP/Safeguarding department & are up to date with the latest practice, which is then shared with Governors and Staff.</p>	<p>Safeguarding Governor to be briefed and reported in termly report to the Safeguarding & Wellbeing Governors Committee Meeting & The Board.</p> <p>See Technology Policy including Online Safety for more details.</p> <p>A referral if necessary may be made to MASH or to Channel.</p>
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Vulnerable children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.	Radicalisation of Individual child through social media, internet, family member or friend.	Likelihood low Severity medium	<p>Building resilience to radicalisation through the promoting of British fundamental values and enabling them to challenge extremist views e.g. PSHEE, RE, history lessons and assemblies.</p> <p>Prevent strategy reflected in safeguarding/curriculum policies.</p> <p>Staff receive basic Prevent awareness training to ensure they can identify children at risk of becoming involved with or supporting terrorism & recognise those that have extremist ideas.</p> <p>Good communication among staff and assimilation of information e.g. safeguarding a weekly agenda item on all staff meetings.</p> <p>Clear referral route for vulnerable children to receive support through the Channel process outlined in Child Protection/Safeguarding policy.</p> <p>Checks on prospective staff /peripatetic specialists and diligence checks conducted on visitors and contractors working in the School. Contractors are supervised at all times.</p> <p>All visitors wear either a green or a red identification badge. Those with a green badge have completed the relevant checks in accordance with the Safer Recruitment Policy and may attend the site without being accompanied at all times by a member of Finton staff. Those with a red badge must be attended by a member of Finton staff at all times. All staff have ID badges and everyone is electronically signed in.</p>	<p>To inform DSL and a referral if necessary may be made to MASH or to Channel.</p> <p>Head/SLT & Safeguarding Governor to be briefed. To also be reported in termly safeguarding report to the Governor Safeguarding and Wellbeing Committee.</p>
Visiting speaker or educational/SEN/Medical specialist who have extremist views or links with radical organisations. Or which have views that contradict 'Fundamental British Values' of individual liberty and mutual respect and tolerance for	Radicalisation of staff or pupils.	Likelihood low Severity medium	<p>All SEN Specialists/therapists working with children have to bring into school their DBS certificate together with ID.</p> <p>All visiting speakers, in-house educational visitors have to bring in a copy of a DBS form or photo ID. The office carries out a risk assessment prior to their arrival. They are never left unattended by staff.</p> <p>Any visiting speaker or specialist not working with children 1:1 is never left unescorted and wears the relevant school visitors badge colour, which is red and are electronically signed in.</p>	<p>Each Friday Deputy DSL meets with School Secretary to check that all visitors for following week have been entered onto the radicalisation assessment record.</p>

those of different beliefs and faiths.			Staff are aware of the above procedure. Before any such visitors comes into school, the School Office completes a risk assessment form. Any concerns are shared with the DSL or Deputy DSL.	
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Appendix 7: Summary of Child Protection Protocol for Staff

The designated safeguarding members of staff in our school are:

DSL – Catherine Gomez supported by the Head, Ben Freeman

Deputy DSL – Susan Dalton

Deputy DSL EYFS – Sasha Jones

Deputy Online safety DSL – Andy Dyer: Assistant Head Technology

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. It ensures there is no maltreatment of children at all levels and that they grow up in safe environment.

KCSiE, 2025 states that Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- 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 impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable children to have the best outcomes.

Child protection is part of the safeguarding process. It refers to the activities that are undertaken to protect specific children **who are suffering, or are likely to suffer, significant harm**. It is the welfare activities to protect children from sexual, emotional and physical abuse as well as neglect. Child protection aims to protect children who are suffering or are likely to suffer at the hands of parents or others who are close to them.

All staff and adults in a school have a statutory responsibility to safeguard and promote the welfare of all pupils at all times. If you have a concern about a child or you receive information that leads you to be concerned that a child has been harmed or is at risk of harm or their welfare is being compromised, you are required to act appropriately to ensure action can be taken to protect the child.

The concern may be because of a disclosure from a pupil, a parent or a third party or may arise due to behaviour that has caused you to become concerned.

Safeguarding issues include: *(See policy for more details)*

- Allegations of physical abuse by a parent, other adult/child or sibling- or of witnessing this.
- Allegations of inappropriate physical/sexual contact by a parent, other adult/child or sibling – alternatively, witnessing this.
- Allegations of witnessing inappropriate behaviour by a parent, other adult/child or sibling (such as drug taking, sexual behaviour, crime).
- Allegations of anything, which may cause physical or mental harm to the child.
- A member of staff witnessing marks/bruises which are unusual or severe. The child does not have to be approached as to their origin by the observing member of staff. This should be discussed with the DLS before taking action.
- Concerns regarding the use of technology, electronic communication, social networking etc. (this is also referred to as online safety).
- Anything else, which could be interpreted as putting the physical or mental well-being of the child at risk.

Procedure Guidance for Staff

Staff should follow this protocol on child protection issues:

1. Listen

Listen carefully to what the pupil is telling you without interrupting. You should remember that when speaking to the child, no promises of confidentiality can be made, and care should be taken to listen and record the child's own words, rather than make suggestions or ask leading questions. Remain non-judgmental and keep an open mind.

2. Record

After speaking to the child in the case of a disclosure, or after observing something unusual, write down the main points of the disclosure/observation on CPOMS, including the date. This is most important as a clear record will be needed further on. Try to write the account as soon as you can to ensure an accurate and detailed record.

3. Inform

Go and talk to the DSL or Deputy DSLs and ensure they are alerted on CPOMS. However, small you may think the incident is the DSL or Deputy DSL may well have further knowledge from other sources that add to the allegation in some way. If you feel the child is in immediate danger, then the DSL or Deputy DSLs should be contacted immediately or you can make a referral direct to Children's Social Care

Please remember the DSL or Deputy DSLs are available to help provide advice and guidance to staff and pupils. If you have a concern or problem and are unclear how to proceed do ask for advice.

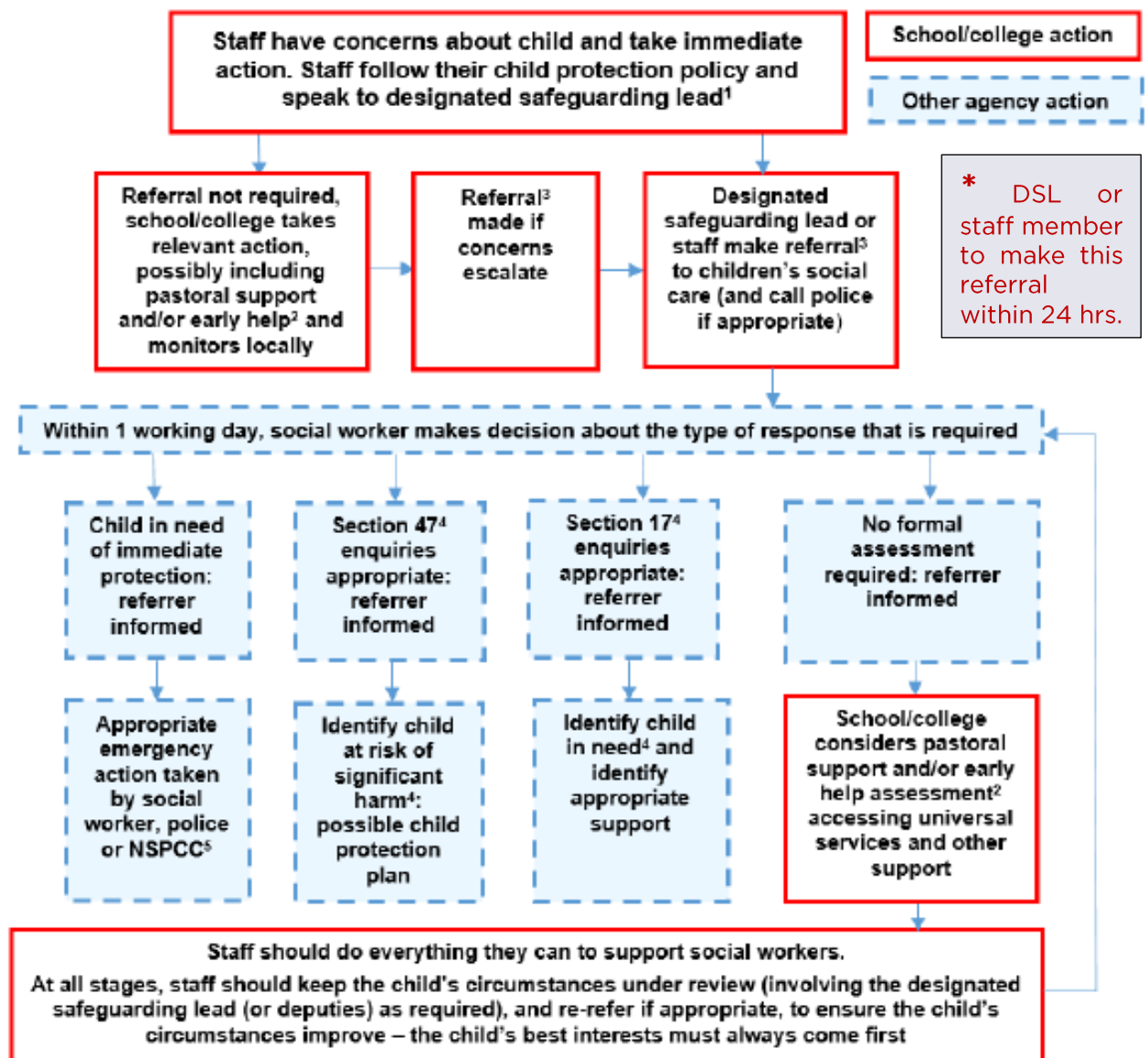
Further points to note

- A child should never be pressured to give information or show staff parts of the body not normally visible when the child is wearing school uniform. Any physical examination of child should be left to a trained Health Care professional.
- In the event of an allegation, being made by a child against a member of staff then the Head must be informed. If the Head is absent or is the person against whom the allegation is made the Chair of Governors or Child Protection Governor must be contacted immediately. They will deal with the matter following Procedures for Dealing with Allegations against Staff. (*For more details see 'KCSiE – 2025 DfE'*)

This is only a brief summary and should be read in conjunction with the Child Protection/Safeguarding Policy

Appendix 8: Actions where there are Concerns about a Child

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. Chapter one of [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. Chapter one of [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 Chapter one of [Working Together to Safeguard Children](#).

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

Appendix 9: Useful Wandsworth Contacts

Head of Advice, Support and Help (ASH) incl MASH, Brief Intervention, Social Workers in Schools and OOH.	Iain Low	Iain.Low@richmondandwandsworth.gov.uk
Multi Agency Safeguarding Hub (MASH) Weekdays 9am – 5pm		mash@wandsworth.gov.uk 020 8871 6622
Out of Hours (OOH) Service, evenings, weekends, and bank holidays		020 8871 6000
Multi Agency Referral Form (MARF)		Professionals making a referral, must complete the Multi-agency Referral Form (MARF).
Wandsworth Safeguarding Children Partnership		www.wscp.org.uk 020 8871 7401 Email: wscp@wandsworth.gov.uk
Head of Service Safeguarding Standards Children's Services	Ruth Lacey	Ruth.Lacey@richmondandwandsworth.gov.uk 020 8871 7858
Interim Safeguarding Standards Service Manager	Rachel Greene	Rachel.Greene@richmondandwandsworth.gov.uk
LADO: Local Authority Designated Officer	Anita Gibbons	Anita.Gibbons@richmondandwandsworth.gov.uk lado@wandsworth.gov.uk 07974 58 6461
Education Safeguarding Officer	Sophie Allen	Sophie.allen@richmondandwandsworth.gov.uk 07775 417475 Work mobile 07931 325 665 mobile
Early Education and Childcare Places Service Lead	Matt Hutt	Matt.Hutt@richmondandwandsworth.gov.uk 0208 871 8820
Outreach & Provider Support Lead- Early Education	Liz Hickson	Liz.Hickson@richmondandwandsworth.gov.uk 020 8871 6223
Social Workers in Schools - Team Manager	Joanne Loveless	Joanne.Loveless@richmondandwandsworth.gov.uk

Wandsworth Family Information Service (FIS)		https://www.wandsworth.gov.uk/fis
Virtual School Education Co-Ordinator	Rachel Wright	Rachel.Wright@richmondandwandsworth.gov.uk
Police		999 for emergencies and 101 for non-emergencies
Crimestoppers free phone		0800 555 111 [information may be passed anonymously]
Vulnerabilities Manager Channel Chairperson	Miranda Hibbert	Miranda.Hibbert@richmondandwandsworth.gov.uk
Prevent partners and advice about extremism	Naheem Bashir	<p>Hate Crime and Prevent Coordinator Naheem.Bashir@richmondandwandsworth.gov.uk</p> <p>Non- emergency DfE advice 020 7349 7264 counter-extremism@education.gsi.gov.uk</p>
Children Missing Education	Elizabeth Eyoma	Elizabeth.Eyoma@richmondandwandsworth.gov.uk
TPD	Training & Professional Development Online	https://www.tpd.org.uk/ https://www.tpd.org.uk/cpd/portal.asp
DFE Helpline	DFE	For non-emergency advice: 0370 000 2288
Report suspected extremism online		https://www.gov.uk/report-suspicious-activity-to-mi5
Report terrorist activity online		https://www.gov.uk/report-terrorism
Report Abuse in Education Helpline	NSPCC	<p><u>Reporting child abuse and neglect NSPCC</u> : online reporting 24 hours day</p> <p>0808 800 5000</p> <p>(Telephone: Monday to Friday 8am – 10pm or 9am – 6pm at the weekends.)</p>

FGM reporting – non emergency police contact number	Police	101 or www.gov.uk/contact-police Project Azure Partnership Team: 020 7161 2888 NSPCC FGM free phone helpline: 0800 028 3550 [information may be passed anonymously]
NSPCC Whistleblowing helpline		NSPCC helpline: 0800 028 0285 (8am-8pm Mon-Fri) help@nspcc.org.uk
Homelessness		Housing Wandsworth Local Authority https://www.wandsworth.gov.uk/housing/

Ameliah Rayan

0208 871 7961 office

07929 862210 Work mobile

Ameliah.Rayn@richmondandwandsworth.gov.uk

Education Safeguarding Lead

07775 417475 Work mobile

Sophie Allen

07931 325 665 mobile

MASH (Multi-Agency Safeguarding Hub)

MASH Manager

020 8871 6622 Out of hours: 020 8871 6000

[MASH @wandsworth.gov.uk](mailto:MASH@wandsworth.gov.uk)

Ruth Lacey, Head of Safeguarding Standards

ruth.lacey@richmondandwandsworth.gov.uk

Early Help

Assistant Director Rachel Egan: rachel.regan@richmondandwandsworth.gov.uk

EHITS Team

020 8871 7746

Early Help Front Door

020 8871 6622

Tooting Early Help Cluster: Nicky Nicholls (Head of Tooting Cluster) & Geraldine Lorage (Team Manager)
020 8871 5559/62222

Principal Administrator Jackie Reynolds

020 8871 7208

Looked After Children

Nova Levine (Head Wandsworth Virtual School)

020 8871 7351

Mobile – 07557 295630 nova.levine@richmondandwandsworth.gov.uk

Prevent & Hate Crime Coordinator

Shamila Majid Shamila.Majid@richmondandwandsworth.gov.uk

Mobile: 07974586486

WSCP (Wandsworth Safeguarding Children's Partnership)

Development manager

020 8871 8610

Wandsworth Safeguarding Children's Partnership

020 8871 7401

www.wscp.org.uk

LADO

Designated Officer (day to day LADO work)

07974 586461

Wandsworth safety net

0207 801 1777

(For Independent Domestic Abuse advisors)

Wandsworth Community Safety Unit (CSU), Robyn Thomas or Avis Bailey

020 3276 2610

Communitysafetyunit-ww@met.police.uk

Thomas@richmondandwandsworth.gov.uk or Bailey@richmondandwandsworth.gov.uk

Wandsworth Police Station, 146 Wandsworth High Street, London SW18 4JJ

www.content.met.police/UK/Home.

Prevent Enquiries

Prevent@richmondandwandsworth.gov.uk

Chair of Channel Panel

Mark.Wolski@richmondandwandsworth.gov.uk

Non-emergency advice is available from the DfE dedicated helpline and mailbox for non-emergency advice. 020 7340 7264

counter.extremism@education.gov.uk

Local Police for non-emergency advice

101

Police Emergency

999 or 112

Private Fostering

Specialist Private Fostering Senior Social Worker (Beatrice Ogunbowale) 020 8871 6471

Beatrice.ogunbowale@richmondandwandsworth.gov.uk

