



**Wellington  
Primary**

**A Policy to Detail Safeguarding and  
Child Protection at WELLINGTON**

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# Wellington Primary School

## Safeguarding and Child Protection Policy 2023

### 1. Introduction

#### WELLINGTON Commitment

**Wellington Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.**

Wellington Primary School fully recognises its responsibilities for child protection and safeguarding. This policy has been developed in accordance with the principles established by the Children Act 1989 and its revisions and the Education Act 2002. It reflects the government publications 'Working Together to Safeguard Children' 2018, 'What to do if You Are Worried a Child is Being Abused' 2015, 'Keeping Children Safe in Education' 2023, and the London Safeguarding Children Board Child Protection Procedures updated March 2023. It is intended that the policy is a 'live' document and should be updated when necessary, 'at least' once a year.

The Governing board and all school staff take seriously our responsibilities under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements within our school to identify, assess and support those children who are suffering or at risk of significant harm, who may be in need of additional help and children who are in particular groups. This school recognises that there is a safeguarding continuum with child protection at the acute end and with prevention and early intervention at the earlier stages. We aim to create a culture of vigilance and work in the best interests of the child.

### 2. Safeguarding Definition:

Safeguarding is defined in KCSiE (Sept 23), paragraph 4 as:

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Adults in our school take all welfare concerns seriously, aiming to protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes and encourage children and young people to talk to us about anything that worries them.

We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. We will always act in the best interest of the child.

The governors and staff understand that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral and cultural development of the individual child.

At Wellington Primary School the children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. Children are taught to recognise when they are at risk and how to get help when they need it. For example:

- Children are helped to recognise unacceptable online behaviour that puts them or others at risk and how to get help
- Children are helped to recognise what a healthy relationship looks like and how to get support if they have concerns about their own or others' relationships
- As a Rights Respecting School, children are given opportunities to learn about their rights as set out in the United Nation Convention on the Rights of a Child and understand why these are important for all children at Wellington Primary.

School teaches a number of safeguarding topics through Relationships Education, see policy, Learning to Respect and the PSHE curriculum with the emphasis on preventative education that prepares our children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/ harassment. This include aspects of the following taught in age appropriate ways:

- healthy and respectful relationships
- boundaries
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, domestic abuse, so-called 'honour'-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school considers wider environmental factors in a child's life that may be a threat to their safety and / or welfare. The school assesses the risks and issues in the wider community when consider the well-being and safety of its pupils. KCSiE (2023), paragraph 23 says:

'Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

This is known as Extra-familial harms or Contextual Safeguarding and is referred to in Working Together to Safeguard Children (2018) and in Keeping Children Safe in Education 2023. We assess the risks and issues in the wider community when considering the well-being and safety of our pupils.

Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. However, this should not prevent staff from having a 'professional curiosity' and should speak with a Designated Safeguarding lead.

### 3. Aims:

- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to and know how to approach adults if they are concerned or in difficulties, believing they will be listened to and appropriately responded to.
- To raise the awareness of all teaching and non-teaching staff regarding the duty to safeguard children and their responsibilities in identifying and reporting possible cases of abuse and children who maybe in need of additional help.
- To provide a systematic means of monitoring children known or thought to be at risk of harm and / or in need of additional help, and ensure the school contributes to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff and between the school and partner agencies.
- To provide a structured set of procedures within the school that will be followed by all members of the school community in cases of suspected abuse, children in need of additional help and children from particular groups.
- To promote effective working relationships with other agencies, especially the Police and Social Care, and Hounslow's Children's Services.
- To ensure that all staff working within our school who have substantial access to children have been checked regarding their suitability to work with children and for the purposes of fulfilling the duty to maintain a single central record of recruitment checks undertaken. This includes verification of their identity, a barred list check; an enhanced DBS check / certificate; a prohibition from teaching check; further checks on people living or working outside the UK; a check of professional qualifications; and a check to establish the person's right to work in the United Kingdom.
- To establish a culture of vigilance and always work in the best interests of the child.
- Through the school's curriculum we aim to teach children about safeguarding and how to keep themselves safe.
- All Staff and Governors will have received and signed to say that they have read Keeping Children Safe in Education September 2023 Part One, The School's Code of Conduct and this Safeguarding Policy. Staff should also familiarise themselves with Annex A of KCSiE Sept 2023 – all of which can be found in the safeguarding folder on staff shared of the school network. Also contained in the folder is 'What to do if you are worried a child is being abused' which is also helpful. Staff will receive training on how to report concerns, where referral forms are kept and who to talk to (Designated Safeguarding Leads - DSLs) with concerns.
- All new staff will receive induction which will include the documents mentioned above, and how to report concerns, where referral forms are kept and who to talk to with concerns. New staff will also receive appropriate induction and similar training.

### 4. Types of Abuse and Neglect – definitions, signs and symptoms

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more

rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic / misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the designated safeguarding lead.

Further information on definitions can be found in KCSiE (2023) in Part 1 and Annex B. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

## **5. Child Sexual Exploitation (CSE) – definitions, signs and symptoms**

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

### **Potential vulnerabilities include:**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe / stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;

- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such. There are three main types of child sexual exploitation:

### **Inappropriate relationships:**

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

### **Boyfriend / Girlfriend:**

Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

### **Organised exploitation and trafficking:**

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

## **6. Child Criminal Exploitation (CCE)**

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

Information about Child Criminal Exploitation can be found in KCSiE (2022) pages 140-142.



## 7. Criminal exploitation of Children and Vulnerable adults – County Lines:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. See KCSiE (2023) page 143/144.

## 8. Domestic Abuse

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

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

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

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. (The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

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

Operation Encompass operates in Hounslow. Schools are informed by email using [www.box.com/en-gb/home](http://www.box.com/en-gb/home). DSL's have usernames and passwords.

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

## 9. Voyeurism Offences

Staff should be aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are

wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

## **10. Female Genital Mutilation (FGM) – definitions, signs and symptoms**

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

Risk factors for FGM include:

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

### **Symptoms of FGM**

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

Indications that FGM may have already taken place may include:

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

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

### **Female Genital Mutilation reporting procedures**

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2023), paragraph 44 says whilst all

staff should speak to the designated safeguarding lead with regard to any concerns about female genital mutilation (FGM), there is a **specific legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

A teacher should make a report. Below is a very short summary and must be read in conjunction with the mandatory reporting guidance found here:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

The mandatory reporting procedures say:

- It is recommended that you make a report orally by calling 101, the single non-emergency number.
- Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.
- In most cases reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day.

When calling 101, the system will determine your location and connect you to the police force covering that area. You will hear a recorded message announcing the police force you are being connected to. You will then be given a choice of which force to be connected to – if you are calling with a report relating to an area outside the force area which you are calling from, you can ask to be directed to that force.

Calls to 101 are answered by trained police officers and staff in the control room of the local police force. The call handler will log the call and refer it to the relevant team within the force, who will call you back to ask for additional information and discuss the case in more detail.

You should be prepared to provide the call handler with the following information:

- explain that you are making a report under the FGM mandatory reporting duty
- your details:
  - I. name
  - II. contact details (work telephone number and e-mail address) and times when you will be available to be called back
  - III. role
  - IV. place of work
- details of your organisation's designated safeguarding lead:
  - I. name
  - II. contact details (work telephone number and e-mail address)
  - III. place of work
- the girl's details:
  - I. name
  - II. age / date of birth
  - III. address
- if applicable, confirm that you have undertaken, or will undertake, safeguarding actions, as required by the Working Together to Safeguard Children (in England) or Working Together to Safeguard People (in Wales) as appropriate. You will be given a reference number for the call and should ensure that you document this in your records.

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

## **11. Children's Mental Health**

All staff Wellington are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead (DSL).

School has developed a strategy to support children and adults in our community called Whole, Happy, Healthy. At Wellington Primary School we aim to promote a safe, stable and inclusive environment for staff and children to ensure that they are able to aspire, perform and succeed. We recognise the impact that wellbeing and mental health can have on the development of the whole child and it is our responsibility to prepare children for the future and to equip them with a range of strategies to develop their emotional literacy in order to cope with whatever life may bring.

In school Mrs Buchanan is our mental health first aider who can be contacted via her email address or via the office email account and Mrs Bird is the school's Trauma Informed Champion.

Alongside a focus on the wellbeing of children, promoting staff wellbeing is imperative because it has a direct impact on wellbeing of the children they are in daily contact with. If staff are engaged, energised and confident, this will enable them to demonstrate the values and ethos of the school and deliver high quality teaching and learning.

Our school believes in developing positive partnerships with families and the local community enabling us to work together in a child centred approach. This will encourage children to communicate their worries and concerns with the school and other adults.

## **12. Children with a social worker**

At Wellington, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

Some children may be supported by weekly sessions for a period of time with the Play Therapist. This allows them a regular time and space to explore any emotional difficulties they may be facing. Regular opportunities are taken to catch up with the children and allow their voice to be heard by a trusted member of school staff.

There are daily attendance checks for vulnerable children, children with an allocated social worker, young carers and children with serious medical needs. A DSL is alerted to absences by the attendance officer.

### **13. Honour – based abuse (HBA)**

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

In February 2023, the age of consent for marriage in England was raised to 18. The Marriage and Civil Partnership (Minimum Age) Act 2022 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent.

It is now an offence, under the Marriage and Civil Partnership (Minimum Age) Act to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding ‘traditional’ ceremonies which would still be viewed as marriages by the parties and their families.

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that students may be getting married should be referred to the DSL.

### **14. Children who are absent from school**

#### **Formerly Children Missing Education (CME) and the schools’ approach**

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

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

In response to the guidance in Keeping Children Safe in Education 2023 the school has:

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

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil’s new school and their expected start date.

## 15. Filtering and Monitoring

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made.

At Wellington, school has appointed the headteacher and Sukhpal Brar (staff Governor) to the role of monitoring and reviewing filtering in school. Strawberry 7, the school IT partners are tasked with having a regular review of what is unblocked each year. We have systems and software in place with device management to ensure harmful content is blocked, recorded and reported to a DSL

Filtering and monitoring is not a standalone area of safeguarding and impacts on a number of areas. Filtering and Monitoring is included in:

- the DSL's role;
- staff training (as does an expectation that they have also received training in cyber-security);
- any risk management plans for vulnerable children;

Monitoring can include:

- Physical monitoring
- Live software monitoring
- Monitoring user logs
- Monitoring individual devices

We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures. Each year (at least) our designated safeguarding lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns. All our staff have taken part in annual cybersecurity training

## 16. Out of School Providers

School hosts a range of out of school hours providers such as sports coaching clubs. School checks with providers to ensure that they meet the guidance in Keeping Children Safe in Education 2023 during community activities, after school clubs and tuition.

Should school have a safeguarding concerns about an out of school provider, Wellington Primary School will follow our own policy and procedures. This may include contacting the Local Authority Designated Officer, LADO, in the case of concerns about adults.

## 17. Counter Terrorism and Security – The Prevent Duty

The school's duties are outlined under the Counter Terrorism and Security Act 2015 (The 'Prevent Duty')

Although there is no requirement for a separate 'Prevent Duty' policy, as a school we have drawn up a risk assessment and a referral form.

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

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Wellington Primary School has identified through discussion with children, staff, parents and Governors, 12 values outlined that underpin our school aims. Of these two stand out as being key to develop with the school community. Respect – treating others as you would like to be treated and Compassion – focussing on what we have in common with each other and not differences. We set British Values in the context of these two key values. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead making a Prevent referral.

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

## **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

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

## **18. Supporting Children**

The school recognises that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. The school recognises that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. The school will support all children, particularly those with additional needs or in particular groups.

We do this through:

- the agreed school aims and the values that underpin these aims
- promoting self-esteem and self-assertiveness, through the curriculum as well as our relationships,
- providing curriculum opportunities to support children in keeping themselves safe in a range of situations,
- promoting a caring, safe and positive environment within the school.
- liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- notifying Children's Social Care as soon as there is a significant concern.
- providing continuing support to a child about whom there have been concerns and who leaves the school by ensuring that appropriate information is forwarded in a confidentially marked envelope as a matter of priority with a return confirmation slip included.
- monitoring, recording and discussing children who do not reach the threshold of abuse, but around whom there are some concerns.

## **19. Supporting Children with SEND or certain health conditions**

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. The Governing Board should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

At Wellington we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place, for example, we have a 'I wish my teacher knew' box which allows all children to refer themselves for a 1:1 session with an adult to explore any concerns they may have. Some children have allocated mentoring sessions either 1:1 or as part of a small group this is run within therapy program. We also run 'Drawing and Talking' sessions within school which allows children to communicate their feelings through drawing and sand play.

At Wellington Primary School we identify pupils who might need more support to be kept safe or to keep themselves safe by:

- identifying the children;
- mapping out individual provision and support;
- reviewing and evaluating progress and support in a given timescale;
- meeting regularly with all stakeholders to review progress or address any concerns.

This section should be read in conjunction with the school's SEND policy.



## 20. Child-on-Child Abuse

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. Staff should know the procedures and systems to minimise the risk of child-on-child abuse and to deal with it in a timely way when it does happen. Wellington recognises that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

This is most likely to include, but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment.

Wellington takes a zero-tolerance approach to abuse, and it should never be passed off, for example, as "banter", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

At Wellington Primary we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

At Wellington Primary we will support the victims of child-on-child abuse by:

- listening to the victim and taking their concern seriously;
- demonstrating good and timely communication with all involved;
- application of the school behaviour policy consistently and fairly
- note taking and recording meetings and decisions
- reviewing these procedures with senior staff regularly.

Staff should use a range of strategies to minimise the risk of child-on-child abuse including thinking carefully about the classroom environment and layout, seating plan, teaching and learning strategies used and our pedagogy cards. Further information of these can be found in the staff handbook.

Children should be encouraged to confidently report abuse, knowing their concerns will be treated seriously, recorded via CPOMs or paper, investigated and dealt with. Support for all concerned will be provided.

WELLINGTON recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. School recognises that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

KCSiE 2023 Part 5 from page 105, and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment.

## **21. Sharing nudes and semi-nudes (previously known as 'sexting')**

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020).

## **22. Sexual Violence**

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003<sup>134</sup> as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Further information on confidentiality and reporting can be found in KCSiE 2023 pages 110 - 113.

Confidentiality and anonymity need to be considered by the school. Reports of sexual violence and sexual harassment, including situations where the young person asks the school not to tell anyone about the incident; making referrals against the wishes of the young person; and considering the potential impact of social media breaching confidentiality need are covered in KCSiE 2023. Report of sexual violence or sexual harassment should include the time and location of the incident. Subsequent risk assessments will include any actions required to

make the location safer. School will also need to consider the impact on siblings. It is important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

## **23. Private Fostering**

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

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

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

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

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

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

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

## **24. Safe School, Safe Staff**

The school will ensure that all members of the Governing Board understand and fulfil their responsibilities, namely to ensure that:

- That Governors have received appropriate safeguarding that could include
  - i. Statutory duties and legislation
  - ii. Understanding safeguarding risks and issues locally and nationally
  - iii. Assessing the effectiveness of safeguarding at WELLINGTON
  - iv. Ways to evaluate the school's safeguarding culture
- There is a Safeguarding and Child Protection policy together with a staff code of conduct policy
- The school operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training, and that all recruitment documentation contains prominent statements of our commitment to safeguarding and promoting the welfare of children
- The school has procedures for dealing with allegations of abuse against staff and volunteers

- The school refers to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been dismissed or removed had they not resigned
- A senior leader(s) has Designated Safeguarding Lead (DSL) responsibility for safeguarding, there are four additional DSLs at Wellington. See Appendix 1 for details
- On appointment, the DSL undertake interagency training (LSCB or Ofsted 'Level 3 equivalent') and also undertake single agency training on the role of the DSL. The DSL will undertake refresher training every 2 years
- All other staff receive Safeguarding training annually as part of their induction and or training, this is updated regularly
- The school will identify further training opportunities to extend knowledge, understanding of broader safeguarding and CP concerns; e.g. Child Sexual Exploitation, FGM and Radicalisation / Prevent awareness raising / training
- Any identified weaknesses in Safeguarding are remedied immediately
- The Chair of the Governing Board is nominated to liaise with the Local Authority in the event of an allegation of abuse made against the Headteacher
- An enhanced DBS check is in place for The Chair of Governors at the relevant level.
- Safeguarding and Child Protection policies and procedures are reviewed annually and the Safeguarding and Child Protection policy is available on the school website
- The Governing Board considers how children may be taught about safeguarding. This will be part of a broad and balanced curriculum, covering relevant issues through personal social health and economic education (PSHE) and through relationships and sex education (RSE), and will also be through the informal curriculum. Pupils' understanding of safeguarding issues and their personal resilience is developed through SMSC links as part of the school curriculum. Pupils are taught about On-line safety and are not allowed to use their own devices in school.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring system – Webscreen.

## **25. The Designated Safeguarding Lead**

The school has a Designated Senior Lead for safeguarding. The Lead DSL is the Headteacher, Debbie Norton. There are two other DSLs: Louise Gleeson and Kuldip Kahlon. A DSL will assume the lead role in Mrs Norton's absence. Appropriate training will be undertaken. The Designated Safeguarding Leads are responsible for safeguarding and child protection at Wellington Primary School. The key role of the Designated Safeguarding Lead is to:

- manage referrals from school staff or any others from outside the school;
- work with external agencies and professionals on matter of safety and safeguarding;
- undertake training;
- raise awareness of safeguarding and child protection amongst the staff and parents;
- ensure that child protection information is transferred to the pupil's new school.
- be aware of pupils who have a social worker\*. School will work with Children's Services and meeting regularly with social workers to discuss support.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.
- work with others to ensure that the school's filtering and monitoring systems are functional and effective

*\* From June 2021, the Virtual Headteacher has responsibility to promote the education of children who have a social worker. See Virtual College Guidance on Children with a Social Worker saved in Safeguarding on Staff shared.*

School will ensure that:

- at least one member of any recruitment panel will have been trained in safer recruitment.
- all members of staff and volunteers are provided with safeguarding awareness information at induction.
- all members of staff and volunteers are expected to read part 1 and annex A of Keeping Children Safe in Education (2023) in order to be clear about their responsibilities with regard to safeguarding
- as part of their training staff know how to report concerns.
- all governors undertake appropriate safeguarding training
- the school publishes prominent statements of its commitment to safeguarding and child protection in the school brochure, recruitment packs, newsletters and any other appropriate publication.
- parents / carers are made aware of the responsibilities the school has in regard to child protection and safeguarding by, for instance highlighting via school website e-safety and online safety information for parents. The school's child protection policy is available on request.
- External providers organising activities for children are aware of the school's safeguarding and child protection guidelines and procedures and understand their responsibilities to share relevant information with the Headteacher.
- the school discusses allegations of abuse against adults working in the school with designated officers at the Local Authority and acts accordingly.
- any member of staff or volunteer found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration of barring following resignation, dismissal, or, in the case of a volunteer when we cease to use their service as a result of a substantiated allegation
- in accordance with the Childcare Act 2006 (amended 2018), the school undertakes an annual information gathering exercise with staff in regard to themselves and, as appropriate, in regard to others with whom they reside (Disqualification by Association). Staff must also inform the Headteacher of any relationships and associations' that they have in school and outside (including online), may have an implication for the safeguarding of children in the school
- the school raises awareness with staff regarding the duty to refer or bring to the attention of the DSL children about whom there are concerns of FGM
- the school raises awareness with staff regarding the duty to refer or bring to the attention of the DSL children or associated adults in regard to whom there are concerns of grooming for radicalisation.
- the school raises awareness with staff regarding the duty to refer or bring to the attention of the DSL children or associated adults in regard to whom there are concerns of grooming for CSE.

The school recognises that, because of their day to day contact with the children, school staff and volunteers are well placed to observe outward signs of abuse. The school will therefore:

- establish and maintain an environment where children feel safe, know that their viewpoints are valued, are encouraged to talk, and are listened to.
- ensure children know that there are adults in the school whom they can approach if they are worried.
- encourage parents and children to see school as a safe place, where concerns can be raised.
- actively encourage the views of children to be listened to.
- include opportunities in the PSHE curriculum for children to develop the skills they need to recognise unsafe situations and associated risks.

The school's procedures will be reviewed annually by the Governing Board.

The names of the designated members of staff for child protection and safeguarding (the school's DSLs) the Designated Officers at the LA, the Multi Agency Support Hounslow (MASH) and Hounslow Social Care are indicated in the staff handbook provided to staff and available on the staff shared drive.

The safeguarding and child protection policy is available publicly on the school website.

## **26. DSL Role and Responsibilities**

**The DSL (Headteacher –Debbie Norton, or other Safeguarding Leads in her absence – Kuldip Kahlon & Louise Gleeson are responsible for:**

- Safeguarding and child protection at Wellington Primary School;
- Referring a child, if there are concerns, to Hounslow Social Care and acting as a focal point for staff to discuss concerns.
- Managing referrals from school staff or any others from outside the school. Referrals should follow the procedure outlined below;
- Securely keeping written records of concerns about a child, including where there is no need to make an immediate referral;
- Ensuring that all such records are kept separately from the main pupil records. On transition, records are sent to the receiving school or college.
- Child Protection records are retained until the child's 25th birthday, in keeping with the Records Management Society guidelines and in accordance the school's GDPR Retention policy.
- The existence of any sensitive information is coded on the pupil's main records.
- Liaising with other agencies and professionals and partners, including parents.
- Ensuring that they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments and provide a report that has been shared with the parents as appropriate.
- Ensuring that any pupil currently with a child protection plan who is absent without explanation is referred to Hounslow Social Care within two days.
- Organising child protection induction and regular refresher training for all staff.
- Ensuring all staff are aware of the Prevent Duty and the duty to report concerns regarding FGM and CSE;
- Providing an annual report for the Governing Board, with termly updates, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children on a child protection plan (anonymised), children with a "child in need" plan or children with in school with lower level concerns, monitoring termly.
- Raise awareness of safeguarding and child protection amongst the staff and parents;
- Ensure that child protection information is transferred to the pupil's new school.

If a DSL is unavailable, the concern should be reported to a member of the senior leadership team and or take advice from local children's social care team. This should be reported to a DSL as soon as possible.

## **27. The Designated Governor for Child Protection is responsible for:**

- Ensuring that the safeguarding policy is maintained and reviewed annually and that safeguarding policies and procedures are monitored and reviewed to ensure their effectiveness.

- Reviewing safeguarding practices regularly with the headteacher and ensuring that the school is carrying out its duties with regard to safeguarding and promoting the welfare of children,
- Ensuring child protection and safeguarding procedures are incorporated into induction procedures for all staff and volunteers, including a new headteacher.
- Ensuring that the school follows the guidance and procedures of the Hounslow Children's Safeguarding Partnership and the London Child Protection procedures.
- Ensuring that the DSL is given sufficient time to carry out their duties, including accessing relevant training.
- The governors satisfying themselves with regards to the appropriate vetting procedures for volunteers who work with children in the school.
- Ensuring that the school has procedures for dealing with allegations of abuse against staff and that they are appropriately implemented.
- Ensuring the school has procedures for dealing with allegations made against other children and that these are appropriately implemented

## **28. All school staff, if they have a concern will report to the DSL regarding:**

- poor attendance and punctuality and
- concerns about appearance and dress - presentation
- changed or unusual behaviour
- concerns about health and emotional well being
- deterioration in educational progress
- discussions with parents about concerns relating to their child
- concerns about home conditions or situations
- concerns about pupil-on-pupil abuse (including serious bullying)
- any other unexplained changes in a child

Concerns should be recorded on CPOMs or written on a record form found on staff shared if CPOMs is unavailable. All verbal conversations should be recorded on CPOMs. The pastoral lead will inform DSLs of any patterns noted weekly.

At Wellington Primary, we recognise the possibility that adults working in the school may harm children. Any concerns about the conduct of other adults in the school should be taken to the Head Teacher without delay (or where that is not possible, to the Designated Safeguarding Lead); any concerns about the Head Teacher should go to the Chair of Governors who can be contacted via the school office.

The following documents are mandatory reading for all staff. Staff will be asked to sign that they have read the documents.

- Keeping Children Safe in Education 2023 [Part One]; and school leaders and staff that work directly with children should also read Annex B
- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- School's Behaviour Policy
- Hounslow's Policy for Children Missing Education that the school has adopted.

Staff might also find the following document useful to read:

*What to do if you're worried a child is being abused – Advice for Practitioners*, saved on staff shared in the safeguarding folder.

## All Staff – reporting procedure

When adults in the school have a concern about a child or young person they should:

- Log the incident on the CPOMS system alerting the DSL from any computer. If a child is in immediate danger or distress following an incident, a DSL should be informed in person immediately.
- All staff can report concerns using the CPOMS on line Safeguarding system alerting the DSL. Other support staff should alert a DSL to a concern so that it can be logged on CPOMS. If CPOMS is unavailable a written log can be completed and handed to a DSL; found in the safeguarding folder on the staff shared drive.
- All verbal conversations with the DSL should be promptly recorded on CPOMS with the safeguarding category.
- If a DSL is unavailable, a member of SLT should be spoken to and / or advice taken from Hounslow Children's Social Care. The DSL should be informed as soon as possible.

## 29. Confidentiality

This section is based on the guidance document 'Information Sharing: Advice for Practitioners Providing Safeguarding Services' DfE 2018 and KCSiE (2023) from paras 115-123.

- The school recognises that all matters relating to child protection are confidential, on a need to know basis.
- The Headteacher / DSL will disclose any information about a child to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with the DSL regarding children when there are safeguarding or welfare concerns.
- All staff must be aware that they cannot promise confidentiality to a child where there are safeguarding concerns.
- The school will always undertake to discuss our intention to refer a child to Social Care with the child's parents / carers unless there are specific reasons not to do so e.g. it could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with Hounslow Social Care on this point.

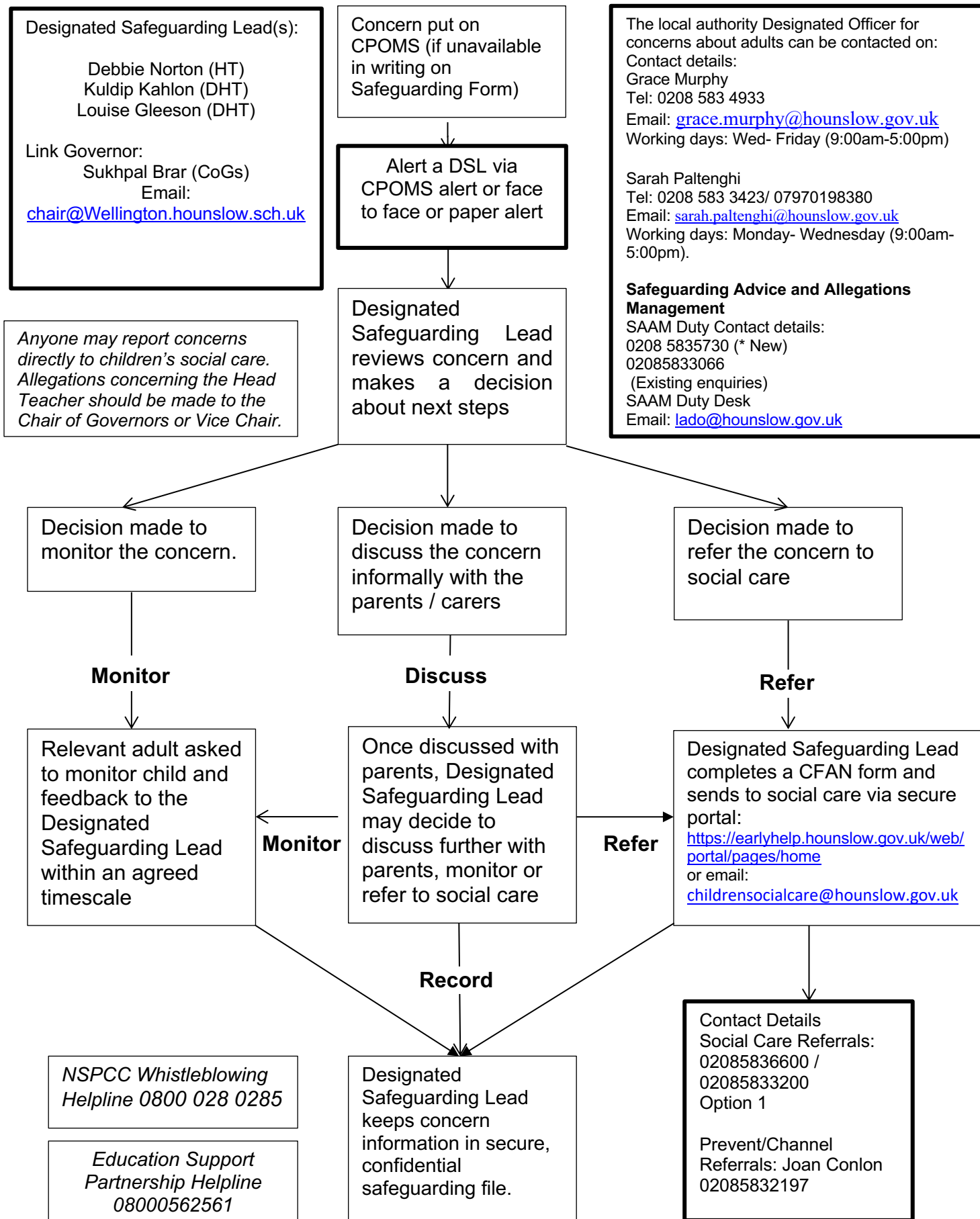
The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. This includes allowing practitioners to share information without consent if it is deemed in the best interests of the child. KCSiE 2023 para 120.



### 30. Safeguarding Flow Chart at Wellington Primary School

Hounslow Social Care Duty Manager (West) 02085833257 (East) 02085834573  
 Anti terrorist line 0800789321

#### FLOW CHART PROTOCOL FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



### 31. Low level concerns about staff behaviour

At Wellington we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the Chair of Governors who can be contacted by via the school office.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the headteacher.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The headteacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

**Allegations** - It is an allegation if the person\* has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.) Allegations should be reported to the LADO 'without delay'.

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

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

**Low-level Concerns** - Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking:

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

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

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

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

\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

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

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

### **32. Allegations against staff**

At Wellington Primary School we recognise the possibility that adults working in the school may harm children. Any concerns about the conduct of other adults in the school should be taken to the Head Teacher without delay (or where that is not possible, to the Designated Safeguarding Lead); any concerns about the Head Teacher should go to the Chair of Governors whose contact details are available from the school office.

- All staff should be aware of safer working practice guidelines and the school's code of conduct.
- Guidance about conduct and safe working practices, will be given at induction including the school acceptable usage policy in regard to technology.
- We understand that a pupil or and an adult may make an allegation against a member of staff. The school has procedures for this eventuality, see section on dealing with allegations against staff.

### **33. Whistle blowing**

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy, adopted from the LA, which can be found in the Safeguarding section of the staff handbook saved on staff shared drive.

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

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached

- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

### **34. Supporting Staff**

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

We will support such staff by providing an opportunity to talk through their concerns or anxieties with the DSL and to seek further support as appropriate.

The Education Support Partnership (Charity) offer a 24hour free and confidential helpline for people working in education, telephone **08000562561** for confidential advice and support.

### **35. Safer Recruitment Policy**

This school has a policy of safer recruitment, at least one member of any recruitment panel has undergone recent safer recruitment training. This training is updated every two years.

The school maintains a single central record of all recruitment and vetting checks on all staff and volunteers. Third party providers of staff, including contractors, are required to evidence recruitment and vetting checks that they have undertaken on their respective staff.

The school advertises, in appropriate literature, that it undertakes safer recruitment checks.

### **36. 'Harm' Test**

The guidance in KCSiE (Part Four) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

### **37. Training**

The key training elements are:

Induction Training – this is mandatory and includes;

- the safeguarding and child protection policy;
- the behaviour policy;
- the staff code of conduct and expectations;
- the safeguarding response to children who go missing from education;

- the role of the designated safeguarding lead, including the identity of the designated safeguarding leads, see KCSiE (2023)

DSLs – attend training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.

All other staff – will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can ‘assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.’ This training is regularly updated. (see KCSiE (2023), paragraph 81.)

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

All staff will receive mandatory Induction Training through INSET and through on line support from the National Online Safety (NOS). Staff training also includes the School Behaviour Policy and Staff Code of Conduct.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

### **38. Online Safety**

At Wellington we have an online safety policy which details how schools helps to protect children.

At Wellington we manage this risk:

When children use the school’s network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. However, many pupils are able to access the internet using their own data plans. To minimise inappropriate use, as a school we have developed a remote learning rationale and policy to help children to be kept safe when they are accessing ‘online learning’ whilst out-of-school. School uses National Online Safety platform for staff training. This is also accessible by parents. Online safety information is shared regularly via through the school website.

We use the four C’s to help identify risks and help with discussions to keep children safe whilst online. They are:

**Content:** seeing illegal, inappropriate or harmful content

**Contact:** harmful interactions

**Conduct:** behaviour that increases the chances of, or causes, harm

**Commerce:** gambling, advertising, scams

Further guidance can be found in the DfE Guidance for Safer Working Practices (Feb 2022)

### **39. Physical Intervention / Positive handling i.e. Team Teach**

The school does not have a “no touch” policy. However, physical intervention and positive handling must only be used as a last resort, when a child is endangering him / herself or others. See school Restraint Policy.

All use of physical intervention is recorded on a Record of Physical Intervention form and given to the Headteacher.

All staff will be appropriately trained in the safe use of restraint.

Staff are expected to use their judgement regarding whether to use a physical intervention and to what degree of force is reasonable. There may well be incidence of the use of restraint that results in the child sustaining any injury, in these cases the Headteacher will consider the appropriateness of the intervention used. Appropriate additional training or action under the disciplinary proceedings may result.

The school's policy on physical intervention reflect the DFE guidance "Use of Reasonable Force"

#### **40. Anti-Bullying**

The school has a discrete anti-bullying policy and a separate anti bullying leaflet for parents, both available on the school's website. (See Anti Bullying Policy and Leaflet for Parents). The policy covers all forms of bullying; including cyber, racist, homophobic and gender-related bullying. All staff are aware that children with SEND and / or differences / perceived differences are more susceptible to being bullied / victims of child abuse. Training from the Anti Bullying Alliance has also been provided.

#### **41. Health and Safety**

The school's Health and Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children. (See Health and Safety Policy published on the school's website.)

#### **42. Children who are lesbian, gay, bi or trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At Wellington, we endeavour to reduce the additional barriers faced by providing a safe space for them to speak to school staff.

#### **43. Monitoring and Evaluation**

This policy will be reviewed at least annually by the Governing Board.

#### **44. Links to other school policies**

The Safeguarding and Child Protection Policy also links to the following other school policies / procedures:

- Staff Code of Conduct
- Whistleblowing
- Allegations against staff
- Attendance
- Anti-bullying
- Behaviour
- Children Missing in Education

- Equalities
- Health & Safety
- Intimate Care
- Medical Policy
- Online safety
- Physical intervention
- Remote Learning
- Safer Recruitment
- Sex and Relationships Education
- Use of children's images

## **Appendix 1: DSLs at WELLINGTON**

This can also be found on staff shared in the staff handbook folder

**If you need to report a safeguarding concern please see:**

Mrs Debbie Norton – Head Teacher  
Designated Safeguarding Lead (DSL)

If absent, please see one of the following:

Mrs Kuldip Kahlon  
Deputy Head Teacher, Designated Safeguarding Lead

Mrs Louise Gleeson  
Deputy Head Teacher, Designated Safeguarding Lead

Safeguarding concerns need to be passed on immediately to one of the designated staff and followed up in writing on CPOMs.

The Local Authority Designated Officer for concerns about adults is: Grace Murphy, London Borough of Hounslow, Telephone: 0208 583 4933.

Please refer to the Staff Handbook for more information.