NORWOOD GREEN JUNIOR SCHOOL

Child Protection & Safeguarding Policy

Designated Safeguarding Lead and Deputy Safeguarding Leads:
Designated Safeguarding Lead - P. Sehgal
Deputy Designated Safeguarding Leads - S.Hutchinson (Pastoral Leader – Safeguarding Operations), J. Makepeace, H. Canbakis, S. Lawrence –

Contact for parents via: the office email (office@ngjs.hounslow.sch.uk), addressed 'Private and for the attention of the DSL'. Contact for staff via: CPOMS wherever possible, DSL email , Pastoral Leader's email, mobile phone number or via the office, who will make immediate direct contact with the Designated Safeguarding Lead/Pastoral Leader. Contact for external agencies: dsl@ngjs.hounslow.sch.uk / s.hutchinson@ngjs.hounslow.sch.uk

Child Protection and Safeguarding Governor: D. Parker (lead))
Governor for Looked After Children: -D. Parker

Contact for Governors via: the office email (office@ngjs.hounslow.sch.uk), addressed 'Private and for the attention of the Governor responsible for Safeguarding' or 'Private and for the attention of the Governor responsible for Looked After Children'.

Early Help Hounslow: [redacted]

Policy ratified by the GB: Nov 2025
Policy to be reviewed: Nov 2026

Addendum:

November 2017	Creation of Addendum section Update of wording in document P.3-9 New forms added to Appendix: Forms
January 2018	Contact info for Social Care updated
September 2018	Updated Policy in line with KCSIE (Sept 2019) Restructuring of order of content including: creating Sections & reordering of Appendices
September 2019	Updated in line with KCSIE (Sept 2019)
March 2020	Appendix Covid-19 added
April 2020	New HSCP Inter-agency Escalation Policy
September 2020	Updated in line with KCSIE (2020), new LADO Details &c.
November 2020	Updated with new LADO information, definitions of CP/CIN, new Virtual College details, new flowchart
January 2021	Updated guidance for Covid-19, post EU Exit recruitment information.
February 2021	Updated HSCB escalation policy.
September 2021	Updated in line with KCSIE (2021)
October 2021	Updated Prevent contact details
November 2022	Extensive full update including KCSIE (2022)
November 2023	Extensive full update including KCSIE (2024) with special reference to Online Safety, filtering and monitoring.
November 2024	Extensive full update including KSCIE (2024)
November 2025	Brief update (no major changes in KCSIE 2025), further detail on information sharing, minor changes to Allegations against a staff member, removal of COVID-19 era appendix, additional notes throughout.

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Section 1: Principle and legislative background

Section 175 of the Education Act 2002 gives schools a statutory duty to promote and safeguard the welfare of children comply with the statutory guidance in 'Keeping Children Safe in Education' DfE and 'Working Together to Safeguard Children' DfE 2018. In addition, other statutory guidance used to inform this policy includes documents listed in Appendix A, alongside reference to local area procedures. In addition, the Teacher Standards 2012 state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Appendix A: outlines the legislation and local area documents relating to this policy.

This policy should be read in conjunction to other school's policies and practices as noted in Appendix B.

Norwood Green Junior School recognises that it has a duty to ensure arrangements are in place to safeguard and promote the welfare of children. As such, it is **everyone's responsibility**, ensuring that the approach is child-centred. This means that the adult should consider, at all times, what is in the **best interests** of the child, in line with Article 3 of the UNCRC.

At Norwood Green Junior School, we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously, encourage children and young people to talk to us about anything that worries them and record those concerns using CPOMS. We will always act in the best interests of the child.

Safeguarding and promoting the welfare of children is defined 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 the impairment of children's mental and physical health or development
- Making sure 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 a part of safeguarding and promoting the welfare of children. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Such action may be taken under Section 47 and Section 44 of the Children Act 1989 (see **Appendix C: 'Child protection – stage by stage'**.) All agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children is reduced.

Children in need are defined as children whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development or their health and development will be significantly impaired without the provision of services. Action should also be 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. This action may be taken under Section 17 of the Children Act 1989 (see **Appendix C: 'Child protection – stage by stage'**.)

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a duty to make enquiries to decide whether they should act to safeguard or promote the welfare of a child who is suffering or is likely to suffer significant harm.

Staff have a responsibility to identify children who may need extra help or who are suffering, or are likely to suffer, significant harm. All staff have a responsibility to take appropriate action, working with other services as needed. In addition to working with the designated safeguarding lead, staff members should be aware that they may be asked to support social workers to take decisions about individual children and support the Pastoral Leader in producing reports about children and their families.

Section 2: Staff recruitment

[redacted]

In line with the guidance Keeping Children Safe in Education, nominated governors have completed Safer Recruitment training. Norwood Green Junior School will ensure that a minimum of one of these governors will be involved in the short listing and interviewing process. In addition, other staff may be involved in the recruitment process.

Governors with Safer Recruitment accreditation are:
P. Sehgal (Safeguarding lead / Headteacher)
S. Hutchinson (Safeguarding leadPastoral Leader)

Other staff with Safer Recruitment accreditation is:
J. Makepeace (Deputy Safeguarding lead / Deputy Headteacher)
D. Blakeburn (School Business Manager)

Staff and Governor screening
All staff, employed in our school, have been carefully selected and screened and, in line with the guidance listed above, have an enhanced Disclosure and Barring Service check. Prohibition checks are carried out on all teaching staff and Governors Management checks are undertaken. Prohibition checks are undertaken for all staff employed, irrespective of the role in which they are employed. Governors have Enhanced DBS checks. Details of all appointments and checks are held in a single central record (SCR), which is retained electronically in a secure section of the school network. All applicants must be informed that the Pastoral Leader will conduct online searches as part of due diligence ahead of interview.

From 01 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. When recruiting staff from overseas, Norwood Green will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

• criminal records checks for overseas applicants – Home Office guidance can be found on GOV.UK; and for teaching positions
•obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC. https://www.naric.org.uk/

Further information can be found in DfE Guidance: Recruit teachers from overseas https://www.gov.uk/guidance/recruit-teachers-from-overseas

Volunteer screening
Volunteers upon appointment will undergo Child Protection and Safeguarding training as part of their induction procedures, including reading part 1 of KCSIE (2025) and the Policy for Safeguarding and Child Protection shared. They will undergo a risk assessment to ascertain whether an Enhance DBS is required.

Decisions regarding whether a volunteer working with children requires an Enhanced DBS is assessed according to whether they will be participating in regulated or unregulated activity. (Annex F of Keeping Children Safe in Education, 2024 and Regulated activity in relation to children: scope, DfE 2012) For advice on what constitutes regulated activity, please contact the Pastoral Leader.

Section 3: Key roles

1) Designated member of staff / Designated Safeguarding Lead (DSL)

a) Role: The designated member of staff (Designated Safeguarding Lead - DSL) is fully trained and receives updated training annually. All staff are responsible for liaising with the DSL, who ensures that any confidential records and notes are kept securely. It is **primarily the responsibility of the designated member of staff and the Pastoral Leader** to have discussions with Early Help Hounslow and Social Care when concerns arise regarding the safety of a pupil in school and follow local safeguarding procedures as set out in Hounslow's Social Care:-Thresholds Guidance & Assessment Protocols Statutory & Common Assessment Frameworks (Oct 2016). However, it must be noted that **any member of staff may make a referral** should concerns arise and action be needed. Pupils for whom there is a concern are closely monitored, including attendance, and where extra concerns arise these are passed on to the appropriate agencies. Advice and support are offered to other members of staff dealing with a pupil for whom there are concerns.

Appendix D: outlines the full role of the DSL, as outlined in Keeping Children Safe in Education, 2024

b) Contacting the DSL / Deputy DSLs / lead Governor for Safeguarding: see front cover of policy

2) Lead for Looked After Children (LAC) and Previously Looked After Children

See also 'Norwood Green Junior School – Looked After Children Policy'

At Norwood Green Junior School, 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 more susceptible 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. The Pastoral Leader will keep a record of all children who have or have formerly had a social worker and will record all Social Care involvement on CPOMS.

The Pastoral Leader is the designated member of staff (Designated Teacher) appointed to champion the educational attainment, social and emotional needs of Looked after Children and act as a source of information and advice about their needs. These pupils are closely monitored, including attendance, and where extra concerns arise these are passed on to the appropriate agencies. The attendance of the designated officer in multi-professional meetings is expected and reports and records kept as required by statutory guidance and good practice. In addition, they act as an advisor to other staff in school to ensure the pupil's needs are met. The Designated Teacher is responsible for liaising with the Virtual School and taking part in the PEP process.

3) Designated Governor for Child Protection and Safeguarding and Looked After Children (LAC)

a) Norwood Green Junior School has a designated Child Protection Governor and Governor for Looked after Children, who will act as the link person between the Governing Body and the Designated Lead. The governor will review safeguarding procedures/practices including access to training with the designated lead or deputy lead. The governors will ensure that sufficient time is given to carry out the duties including accessing training. The monitoring format for reporting to governors is included in Appendix F. Where safeguarding concerns arise regarding a member of staff, the governor will liaise with the Chair of Governors. Where the Chair of Governors is the designated CP Gov / LAC, they will liaise with the Vice Chair.

Appendix E: outlines the Role of the Governor for Child Protection and Safeguarding
Appendix F: Governor monitoring report for safeguarding

b) Contacting the lead Governor for Looked After Children: see front cover of policy

Section 4: Staff training

Through training, all staff (teaching and non-teaching, including volunteers) will be able to recognise the signs of abuse and understand their responsibilities when a child may be at risk of harm. Training of all staff will formally be updated annually, with regular on-going updates and input throughout the year. This includes the training for the Designated Safeguarding Lead (DSL). Staff on-line training is also accessible via the Hounslow Safeguarding Children Partnership. The Pastoral Leader will take responsibility for ensuring that all staff receive the appropriate updated training every year, including reading the latest update to Keeping Children Safe in Education.

Andrew Hall's weekly Safeguarding bulletin is e-mailed to key members of staff weekly and the staffroom Safeguarding board displays key information, which is updated at least weekly. Staff meeting morning messages are also used to highlight issues and concerns, raising awareness with staff and ensuring vigilance in terms of Safeguarding issues. Safeguarding messages are regularly delivered in weekly INSET.

The Pastoral Leader will contribute to the safeguarding of children at Norwood Green by taking an active role in the Community Action Partnership Panel, Primary DSLs Network and the Children's Social Care and Schools Liaison group.

Appendix G: Staff training programme

Appendix H: HSCP Virtual College Safeguarding e-learning access procedures outlined.

Section 5: Types and signs of abuse, neglect and exploitation (as outlined in 'Keeping Children Safe in Education' DfE ~~2024~~ 2025):

What staff should look out for:

All staff members and volunteers should be aware of the signs of abuse, neglect and exploitation so that they are able to identify cases of children who may need help or protection. Adults working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.

All staff at Norwood Green Junior School 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 Pastoral Leader, who is the Senior Mental Health Lead.

We also 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 susceptible 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.

Appendix I: provides advice to staff when dealing with a disclosure of abuse.

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place 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.

Section 5.i: Types of abuse

1. Physical abuse
This is 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.

In addition, the London Borough of Hounslow Children's Services Procedures Manual defines Physical abuse as any form of injury, where there is definite knowledge or reasonable suspicion the injury was inflicted, *or knowingly not prevented*, by any person having custody of the child.

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

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

Mandatory Reporting:

On 25 February 2025 the Crime and Policing bill was introduced into Parliament. It includes provisions to introduce a new statutory duty for individuals undertaking key roles with responsibility for children and young people in England to report sexual abuse when they are made aware of it. It also includes a new criminal offence of attempting to prevent someone reporting child sexual abuse.

The duty will apply to anyone taking part in regulated activity with children in England, such as teachers, social workers, healthcare professionals and those working in voluntary roles with children.

The duty will require those taking part in regulated activity to make a report if they:

are told about child sexual abuse, either by a child or an adult involved
witness child sexual abuse in person
see or hear it in the form of images, videos or audio recordings.
The bill sets out specific conditions where exemptions will apply, including in relation to certain consensual activities between children and specified services where confidentiality is necessary for the safety and wellbeing of children.

If an individual does not carry out the duty, they may be referred to the Disclosure and Barring Service, who will assess their suitability to work or volunteer with children in the future. Anyone who prevents or attempts to deter someone else from reporting will face criminal charges.

Once the Crime and Policing bill has passed through Parliament, the government will develop and publish guidance on the mandatory reporting duty.

4. Neglect

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

Staff also need to be aware of the following and act accordingly to inform the DSL and follow protocols as set out in this policy:

Section 5.ii: Signs of abuse:

The following should not be viewed as finite. Indicators of abuse *may* include some of the following and abuse may cut across a number of the categories of abuse. Any of these signs in children should be recorded on CPOMS and the Pastoral Leader informed. 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.

Physical Abuse: • unexplained injuries / bruises - finger tip bruises e.g. on face • torn frenullum - under tongue • bites • burns • bald patches • haemorrhages behind eye lashes • untreated injuries • fear of medical help • fear of returning home • withdrawal from physical contact • arms and legs covered in hot weather • aggression • improbable excuses	Emotional Abuse: • physical, emotional, developmental delays • over-reaction to mistakes • inappropriate emotional responses • thumb-sucking, rocking, hair twisting • fear of new situations • low self-esteem • running away • self-mutilation • fear of parents being contacted • drug/solvent abuse • scavenging and stealing • anxiety • hypervigilance • withdrawal / apathy
Sexual Abuse: • sudden changes in behaviour/performance • displays of affection in sexual way • acting "like a baby" • distrusts of familiar adults • wetting and soiling • sleep disturbance and nightmares • throat infections, STIs • fear of undressing • tendency to cling • tendency to cry • genital itching • unexplained money • apparent secrecy • depression, withdrawal	Neglect: • constant hunger • constant tiredness • poor state of clothing • frequent lateness, non-attendance • untreated medical problems • poor personal hygiene • emaciation • low self-esteem • scavenging/stealing • running away

• anorexia, bulimia • phobias/panic attacks	

Hounslow has developed a 'Neglect Strategy: A Partnership Approach to Tackling Neglect in Hounslow 2017 – 2019'. The following table taken from the document identifies the risk factors, which increase when in multiple.

Child risk factors	Parental risk factors	Wider determinants of health
• Disability • Chronic ill-health • Pre-term or low birth weight baby • Emotional and behavioural problems	• Poor mental health • Domestic violence and abuse • Alcohol and substance abuse • Maternal low self-esteem and self-confidence • Poor parental level of education and cognitive ability • Poor experience of caring behaviour in parents own childhood • Depriving physical and emotional environment in parents own childhood • Experience of physical, sexual, emotional abuse in parents own childhood • Health problems during pregnancy	• Poverty • Unemployment • Poor living conditions • Social isolation and lack of community support

Section 5.iii: Non-Accidental Injuries

There is a danger in thinking that non-accidental physical injuries are large and obviously visible. Minor injuries can be as important as more serious ones. If the former are not recognised, a more serious injury may follow.

Visible injuries are often noticed by either teachers or LSAs. Many non - accidental injuries are not easily visible, often they are covered by clothing. When children are changing for swimming etc. discreet opportunities arise for noticing anything unusual. Sometimes children who have an injury are reluctant to change for PE, want to change alone, or repeatedly "forget" their kit.

Suspicious injuries and changes in behaviour need to be noticed and reported to the DSL and Pastoral Leader via CPOMS.

- We expect parents/guardians to tell us if there is anything wrong with a child**.** If you notice an injury which you were not aware of then it may be appropriate to gently enquire about it. You may then decide that the child should go to the school office to see a First Aider for attention. All injuries dealt with by a First Aider are logged. If you are unsure about whether to take action about a child or are concerned about an injury, refer your concerns to the DSL. Children should never be **made** to show their injuries or have their clothing removed from them **without permission** as this is contrary to the Children Act.

- Injuries are not always obvious, sometimes children show unexplained changes in behaviour, especially clinginess or repeated head and tummy aches or other somatic conditions. Re-enactment in a drama situation or obsession with either eating or not eating can also be symptoms of abuse. Children who suffer physical abuse themselves often show violence to other children. Children however rarely bully others without some reason - real or imagined. Behaviour of this type should be reported to the Pastoral Leader and DSLs via CPOMS so that possible causes can be investigated.

- If a child is suffering bullying at school, he/she may be reluctant to leave the classroom, go to the toilet or be in the playground. This should be investigated to ascertain the issue and recorded using CPOMS.

Section 6: What adults should do if they have concerns about a child?

If staff members have concerns about a child they should raise these with the school's Designated Safeguarding Lead (DSL)/Pastoral Leader and record them on CPOMS as soon as possible. This also includes situations of abuse which may involve staff members. The Pastoral Leader will usually decide whether to make a referral to children's social care, but it is important to note that **any staff member can refer their concerns to children's social care directly. Staff should share any concerns they have about a child with Pastoral Leader. However, it should be remembered that sometimes children will not feel ready or not know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. It is therefore always important when receiving a disclosure from a child not to show shock, anger or disbelief.**

Where a child and family would benefit from coordinated support from more than one agency (for example: education, health, housing, police) there should be an interagency assessment. This is done via the Early Help Hounslow procedures (see **Appendix J: 'Contacts'**). These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The Pastoral Leader can advise on the completion of a Portal Referral for Early Help. Please note that parental consent must be obtained to make a referral for Early Help services.

If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to children's Social Care immediately (see **Appendix J: 'Contacts'**). **Anybody can make a referral**. If the child's situation does not appear to be improving the Pastoral Leader should contact Intake with additional information, consider a re-referral or refer to the Liason Group/Education Link Social Worker/Community Access Panel. Concerns should always lead to help for the child.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action.
Poor practice includes:

- failing to act on and refer the early signs of abuse, neglect and exploitation;
- poor record keeping;
- failing to listen to the views of the child;
- failing to reassess concerns when situations do not improve;
- sharing information too slowly; and a lack of challenge to those who appear not to be taking action. There is further guidance on information sharing in this policy.

Appendix J: Outlines contacts for making a referral
Appendix C: Outlines the referral process and the subsequent stage by stage Child Protection procedures

Section 7: Parental involvement in safeguarding issues

Norwood Green Junior School believes in working closely with parents and in most cases where we have a concern about a pupil, the parents will be informed. In serious cases where action is required to be taken further, then Early Help Hounslow procedures will be followed and potentially Social Care will become involved. While we ideally would like to work with parents and seek parental agreement for involvement of external services such as Social Care, it must be noted that this is not a requirement for a Safeguarding referral and should not hold up the referral process. Where Early Help or Social Care become involved, we will follow any requests in terms of supporting any requirements to engage with parents in the processes undertaken.

Section 8: Allegations against a member of staff

- See also Norwood Green Junior School – 'Dealing with Allegations of Abuse of Children Made Against Teachers and Other Staff' Policy

Where there is a concern that a member of staff may have behaved inappropriately, the Head Teacher will investigate the matter in accordance with the procedures laid down in the policy 'Dealing with Allegations against Staff'. This policy also deals with procedures for dealing with accusations against the Headteacher. Where an accusation is made against the Headteacher, the member of staff reporting concerns involves the DSL. Where the DSL is the same person as the Headteacher, the Chair of Governors will be made aware and should contact the LADO for support. Where the allegation made concerns the Head Teacher, the Chair of Governors will investigate the matter in accordance with the procedures laid down by the school's policy, which is made available to the Chair of Governors when such an incident occurs. A member of the school staff will not attempt to investigate unless authorised to do so by the Chair of Governors in agreement with the DSL (or Chair of Governors in regard to the Headteacher). Where an allegation concerns a member of staff who is not the Headteacher, the procedures laid out in the policy will be followed and the DSL informed.

Section 9: How do we ensure effective safeguarding?

Mission Statement:

Our safeguarding work seeks to support the child's development in ways which will foster security, confidence and independence. It should be regarded as central to the well-being of the individual and is therefore seen to be an intrinsic part of all aspects of the curriculum.

At Norwood Green Junior School, we aim to ensure teaching and non-teaching staff are aware of their responsibility for Safeguarding and ensure all staff know what constitutes abuse and act upon any concerns.

The school recognises that Safeguarding is not just about protecting children from deliberate or potential harm. It relates to all pupils and all aspects of school life including, for example: pupils' health and safety; the use of reasonable force; meeting the needs of pupils with medical conditions; providing first aid; risk assessments for educational visits; intimate care; internet or e-safety; appropriate arrangements to ensure school security, awareness of local area contexts, and providing a safe learning environment.

Norwood Green Junior School will carry out the duty to promote and safeguard the welfare of children through:

- teaching and learning
- pastoral care
- extended school activities
- use of CPOMS
- participation in Child Protection, Child in Need and Early Help procedures.

All members of the school community (including volunteers and governors) will at all times establish and maintain a safe and supportive environment where children:

- feel secure
- are encouraged to talk to adults they can trust, including making them aware of the DSL team and the 'Special Adult' system
- are listened to

<u>The Curriculum:</u>

Norwood Green Junior School aims to safeguard pupils by helping pupils to acquire the relevant information, skills and attitudes to resist abuse in their own lives and to prepare them for the responsibilities of their adult lives. Children at Norwood Green Junior School 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.

We aim to promote "the safe child", which we define as that outlined below:

A safe child:

- is valued
- is self confident
- has self esteem
- has the skills and knowledge to protect her/himself.

A safe child knows:

- that she/he has the right to be safe knows that she/he has rights over her/his own body.
- that it's o.k. to say no.
- how to be appropriately assertive

A safe child understands:

- the difference between good and bad secrets
- what might be a potentially dangerous situation
- the difference between appropriate and inappropriate touches.

A safe child is able to:

- trust, recognise and express her/his feelings
- solve problems
- make decisions
- be assertive

In order to achieve the above, we educate our pupils overtly about issues which will support safeguarding through specific programmes, and less overtly to support pupils to develop their independence, assertiveness, pupil voice and social skills, to name a few. This second aspect is often referred to as the hidden curriculum and the school is currently developing a curriculum which ties in these 'soft skills' more overtly with our formal curriculum. The curriculum planning documents makes these links.

Specific curriculum programmes undertaken in the last two years have included: SEAL; Jigsaw; Relationships Education; PANTS NSPCC workshops for children and parents; Rights Respecting schools work around the Rights of a Child (Gold award achieved); White Ribbon education around violence in the home (of which the school has a number of staff recognised for this work within

Hounslow); Anti-Bullying weeks (the school has achieved the BIG award twice, most recently in 2018); Year 4 Road Safety training; Yr. 6 Junior Citizen training; Yr 5 Cybercrime Awareness; Yr 6 Police Workshops; Circle Time and Friday Celebrations, in which the wider achievements of pupils are recognised and wellbeing aspects integrated. These programmes will continue going forward. In addition to this, the school has so far trained three members of staff to undertake Mental Health First Aider training, with more to be trained this year, as well as undertaking and overseeing a Mental Health and Wellbeing award. The Pastoral Leader is qualified as the school's Senior Mental Health lead, referring children to MHST and other supports. In addition to this, a wellbeing group has been established to oversee pupil and adult wellbeing initiatives and further support safeguarding of pupils in school.

At Norwood Green Junior School we 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. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the Pastoral Leader in person or by using CPOMS or both.

Record Keeping Procedures:

Appendix K: NGJS Safeguarding Forms

Accurate records are vital to protect children and staff and to enable effective referral. Forms relating to child protection and safeguarding are contained in **Appendix K.** However, all concerns must, where possible, be recorded using the CPOMS system in the first instance. Eventually our physical files on Families Causing Concern will be replaced by CPOMS records.

General records for pupils are kept in the pupil files which are accessible to all professionals within the school and are secure out of working hours. However, records for pupils on child protection procedures and / or causing concerns are kept securely with the Pastoral Leader. Children with current or historic child protection or Safeguarding concerns are flagged up with their class teacher and any other relevant staff at the start of the academic year for those transferring to a new teacher and monitored for current / ongoing safeguarding concerns using the CPOMS system.

The Pastoral Leader reports regularly to the Governing body on:

- Number of safeguarding incidents
- Number of pupils with a child protection plan
- Safeguarding Training
- Number of LAC
- Number of suspensions
- Number of permanent exclusions
- Harmful sexual behaviour
- Protected characteristics
- Bullying

as well as a general update on Child Protection issues in the school.

The Pastoral Leader will ensure that all Social Care involvement is recorded on CPOMS.

Records are made on CPOMS when:

1. There are concerns about the welfare of a child -
    - E.g. home conditions
    - attendance and lateness
    - dress and appearance
    - punctuality
    - health and fitness
    - unexplained injuries
    - consistent attention seeking
    - tiredness
    - unexplained hunger

2. There is a change in behaviour or unusual behaviour.
3. There is deterioration in educational progress.
4. There is concern over the response of parents to the teacher and /or child.
5. There is a suspicion of significant harm to a child and a referral has/is made.
6. If reports are needed for a child professional case conference or criminal/civil courts.

7. CPOMS is also used to record Behaviour and SEND incidents and information in line with our Behaviour and SEND policies. We believe in taking as holistic a view of the child as possible.

Recording concerns on CPOMS:

Records need to be:

- factual (no opinions) – it is important to avoid paraphrasing and to use children's own words accurately
- non-judgmental (no assumptions)
- clear
- accurate
- relevant

Staff use observable / 'real time' event recording, where possible, and record in detail the date, time, context, observations and exact words of children as well as their own responses to the child where a disclosure has occurred. However, it is also important to recognise that the child needs to be given attentive listening from the adult with whom they are sharing their information, and the recording may need to happen immediately after a child has disclosed, in some circumstances. Staff must ensure that no promises of confidentiality are given to a child. However, reassurance and support for the child can be expressed to support them through the difficult process of disclosure. At Norwood Green Junior School, we always follow the guidance: "Receive, Reassure, React, Respond":

Receive:

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

Reassure:

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously. Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns. Tell the child that you will need to tell some people, but only those whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React:

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions. Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to. Refer directly to the named child protection officer or designated person in your organisation (as set out in the organisation's child protection policy). Do not discuss the case with anyone outside the child protection team.

Record:

Make some very brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by Court. Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual.

The professional judgements of staff are recognised, valued and recorded as such. It is recognised that the school's knowledge of a particular child or family is important. However, limited this information may seem, it could form a significant contribution. KSCiE refers to this as 'contextual safeguarding' whereby assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and / or welfare. The school assesses the risks and issue in the wider community when considering the well-being and safety of its pupils. KCSIE 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 susceptible 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.' It is always important to apply Contextual Safeguarding Principles to the online world as well as the physical environment and to understand that Contextual Safeguarding Theory applies to children as well as adolescents.

Records and reports should be shared with the DSL/Pastoral Leader using the CPOMS system as a matter of urgency, ideally at the point of observation or disclosure, or as soon as is reasonable afterwards. If a referral is to be made, the Early Help Hounslow (or equivalent in neighbouring Boroughs depending on the home address of the child) procedures are subsequently followed by the Pastoral Leader, DSL or other adult should they feel the need to act independently of the DSL. Should the DSL, Deputy DSLs or Pastoral leader not be available to receive reports via CPOMS, an attempt to ring them should be made. If contact is not possible and CPOMS is unavailable, written records are to be presented to the School's Business Manager, Ms Blakeburn who will continue to seek contact the DSL / deputy DSLs/Pastoral Leader immediately, informing them of the content and subsequently locking the records away in the Safeguarding cupboard, which is ~~now~~ in the S~~ENDCO~~/Pastoral Leader office. Children and their parents have a right to see CPOMS records following a Subject Access Request and staff recording concerns on CPOMS should be mindful of this.

Multi-agency working and information sharing

The school will ensure that it provides good quality Portal referrals, and detailed and comprehension welfare checks, conference reports and other information as required and recognises the importance of attendance at all meetings called when there is a concern regarding the safeguarding of a pupil and/or where formal safeguarding procedures are in operation. It is recognised that good multi-agency working is essential and that information amongst agencies must be shared to obtain best outcomes for children. Where there are concerns about a child but thresholds have not been met, the Pastoral Leader/DSL should always consider holding a Professional group, TAF or TAC where appropriate. The Pastoral leader should make every effort to be aware of the Professional Group working with a Norwood Green family, even when the NGJS child is not part of a CP, CIN or Early Help plan.

KCSIE (2025) notes the importance of information sharing between practitioners and local agencies. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. *This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.*

The DfE's document "Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers. (2024) gives seven "golden rules" of information sharing:

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework1 to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child2and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. You need a lawful basis3 to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm4, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer5), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support and only share the information they need to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information. When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Section 10: What should staff and volunteers do if they have concerns about safeguarding practices within NGJS?

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

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.

Section 11: Further information

11. I: Children with Special Educational Needs and/or Disabilities (SEND)

- **See also 'Norwood Green Junior School – SEN Policy'** (updated annually)

We recognise that statistically children with Social, Emotional and Mental Health (SEMH) difficulties and disabilities are most susceptible to abuse, neglect or exploitation. All staff that support these pupils will be made aware of the need for vigilance for signs of abuse.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

The children in our Centre for the Deaf could be viewed as particularly vulnerable due to potential communication difficulties which may inhibit any disclosure. The staff in the Centre for the Deaf are trained to be especially vigilant with regards to this.

Appendix L: 'Investigation of alleged abuse involving children with SEN or disabilities' provides more specific guidance on dealing with abuse or alleged abuse of children with SEN and / or disabilities.

11. Ii: Children who are absent from Education (FORMERLY "CME")

The following are relevant extracts from the statutory guidance 'Children who are absent from Education' DfE 2016

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children absent from education (formerly "CME") are at significant risk of underachieving, being victims of abuse, and becoming NEET (not in education, employment or training) later in life.

Schools' duties

Schools must monitor pupils' attendance through their daily register. Schools should agree with their local authority the intervals in which they will inform local authorities of the details of pupils who are regularly absent from school or have missed 10 school days or more without permission. Schools must also notify the authority if a pupil is to be deleted from the admission register in certain circumstances. Pupils who remain on a school roll are not necessarily missing education but schools should monitor attendance and address it when it is poor. It is also important that pupils' irregular attendance is referred to the authority.

Schools also have safeguarding duties under section 175 of the Education Act 2002 in respect of their pupils, and as part of this should investigate any unexplained absences. Significant or concerning absences should also be recorded via CPOMS

Schools must also arrange full-time education for excluded pupils from the sixth school day of a fixed period exclusion.

In addition, to ensure that children can be located, KCSiE, 205, states that 'where reasonably possible, schools and colleges should hold more than one emergency contact number for each pupil or student.'

Children at particular risk of missing education:
There are many circumstances where a child may become missing from education so it is vital that the school in liaison with the local authorities make judgement on a case by case basis. The list (is not exhaustive) below presents some of the circumstances that should be considered when establishing their Children absent from Education (formerly CME) practices and policies:

1. **Pupils at risk of harm/neglect** - Children may be missing from education because they are suffering from abuse or neglect. Where this is suspected school staff should record via CPOMS and follow local child protection procedures. Local authority officers responsible for CHILDREN ABSENT FROM EDUCTION (formerly "CME")should check that a referral has been made and, if not, they should alert children's social care. If there is reason to suspect that a crime has been committed or the child's safety is at risk, the police should also be involved. Also see: *Working Together to Safeguard Children (2023)*

2. **Children of Gypsy, Roma and Traveller (GRT) Families** – Research has shown that many children from these families can become disengaged from education, particularly during the secondary school phase. It is therefore vital that schools inform the LA when a GRT pupil leaves the school without identifying a new destination school, particularly in the transition from primary to secondary so that they can attempt to facilitate continuity of the child's education. Although many are settled, some GRT families move regularly and their children can be at increased risk of missing education. Local authority Traveller Education Support Services (TESS), where these exist, or named CHILDREN ABSENT FROM EDUCTION (formerly "CME") officer within the LA, can advise schools on the best strategies for ensuring the minimum disruption to GRT pupils' education, for example dual registration with other schools or the provision of electronic or distance learning packages where these are available.

3. **Families of Armed Forces** - Families of members of the Armed Forces are likely to move frequently – both in UK and overseas and often at short notice. Schools and local authorities should contact the MOD Children's Education Advisory Service (CEAS) on 01980 618244 for advice on making arrangements to ensure continuity of education for those children when the family moves.

4. **Missing children**- Children who go missing or run away from home or care may be in serious danger and are susceptible to crime, sexual exploitation or abduction as well as missing education. Further sources of information about missing children are listed later in this policy.

5. **Children and young people supervised by the Youth Justice System** - Children who have offended or are at risk of doing so are also at risk of disengaging from education. Local authority Youth Offending Teams (YOTs) are responsible for supervising those young people (aged 8 to 18). YOTs should work with the local authority CHILDREN ABSENT FROM EDUCTION (formerly "CME") officer to ensure that children are receiving, or return to, appropriate full-time education. Where a young person was registered at a school prior to custody, the school may keep the place open for their return.

6. **Children who cease to attend a school** – there are many reasons why a child stops attending a school. It could be because the parent chooses to home educate their child. However, where the reason for a child who has stopped attending a school is not known, the local authority must investigate the case and ensure the child is receiving suitable education.

Norwood Green Junior School – CHILDREN ABSENT FROM EDUCTION (FORMERLY "CME") procedures:
Absences and concern for pupils' absences by any member of staff should initially be raised with F. Remtulla who is responsible for attendance within the office team alongside the HT. Following investigation / discussion between Mrs Remtulla and the HT, referral will be made to the LA Children who are absent from Education responsible person should it be deemed appropriate, taking account of the statutory guidance in 'Children who are absent from Education' (DfE 2016).

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse, neglect and exploitation and may also raise concerns about others 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 (2025) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:

a. leave school to be home educated
b. move away from the school's location
c. remain medically unfit beyond compulsory school age
d. are in custody for four months or more (and will not return to school afterwards); or
e. are permanently excluded

5. A robust policy for monitoring the attendance of children in Alternative Provision

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.

Contact details of the LA CHILDREN ABSENT FROM EDUCTION (FORMERLY "CME") officer is set out in **Appendix J: Contacts**

11. Iii: Private fostering

Private fostering occurs when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

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, neglect and exploitation, 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.

Should a member of staff be aware of a child not living with his / her parents, this should be brought to the attention of Mrs Remtulla, in the office, who will investigate whether it is a private fostering scenario. If so, the DSL is to be informed and the local authority notified. Any suspicion of a private fostering arrangement must be recorded on CPOMS.

11. iv: Child Sexual Exploitation (CSE) (Keeping Children Safe in Education 2025)

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)

The definition, which can be found in KCSIE (2025), is:

"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)

Sexual exploitation can have links to other types of crime, such as: child trafficking; domestic abuse; sexual violence; grooming; abuse images of children and distribution; drugs-related offences; gang-related offences; immigration related offences; and domestic servitude.

Sexual exploitation is never the victim's fault. Early sharing of concerns is key to providing effective help where there are emerging problems. Should you have concerns about any child or their siblings who may be harmed or at risk of harm around this area, you should record your concerns via CPOMS, discuss with the DSL or Pastoral Leader and follow the in-school process.

11. v: Honour Based Abuse (Keeping Children Safe in Education (2025)

Further information on so-called 'honour based' abuse: 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. If in any doubt, staff should speak to the designated safeguarding lead or Pastoral Leader.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. Should you have concerns about any child who may be harmed or at risk of harm around this area, you should discuss with the DSL or Pastoral Leader and follow the in-school process. The Pastoral leader will be responsible for ensuring that all staff receive regular training on the issue of HBA.

Note that the correct phrase to use is so-called 'Honour-based' Abuse, not 'Honour-based' violence. This is because there are other kinds of 'Honour-based' abuse, not only violence. See also section 11. Vii "Female Genital Mutilation".

11. vi: Domestic Abuse and Encompass

The definition of Domestic Abuse is:

any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. In KCSIE 2024, and again in 2025, the definition of 'abuse' has also been changed to clarify that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

(See KCSIE (2025))

Operation Encompass is a local area adopted procedure between police and schools to inform schools should an incident of Domestic Violence come to the notice of the police. The police will inform the school via email to their named contacts, reporting the child's name so that the school is aware and can undertake welfare checks to support the pupil. Should further disclosures come to light, staff should discuss these with the Pastoral Leader or DSL who should inform relevant parties through referral processes. The Pastoral Leader will liaise with Domestic Violence services in the local area to arrange support for families and children.

11. vii: Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- 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

At NGJS, our school intake makes Female Genital Mutilation (FGM) a potential area of abuse. KCSIE (2025) states "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".** This guidance is specific, and refers to the individual teacher and not the DSL on their behalf, although of course they can be supported. However, if FGM is only suspected, the Pastoral Leader will meet with the child's mother at the earliest possible opportunity.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. The Pastoral Leader will work with local FGM services to provide training and support.

In addition, since February 2024 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.'

Appendix M: Provides further FGM information, including the duty to report FGM.

11. viii: Prevent and Channel

The Prevent Strategy (Appendix N) outlines the formal obligation of the school and the referral process should a member of staff have concerns about radicalisation of a child. It also outlines the school's approach to supporting the Prevent strategy through its educational teaching.

Appendix N: Prevent Strategy

11. ix: Child on Child abuse including Sexual Violence and Sexual Harassment

Staff should be aware that safeguarding issues can manifest themselves via child on child abuse. We use this term rather than the former "peer on peer abuse" to emphasise the potential impact. This is most likely to include, but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Norwood Green Junior School, 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. At Norwood Green Junior School, we understand that all online incidents are Safeguarding incidents and are best understood using Contextual Safeguarding theory. 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 or concerns behaviour online
- 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

NGJS has a separate policy on this area called ‘Allegations of Child on Child Abuse’.

Keeping Children Safe in Education (2025) notes that reports that this type of abuse are likely to be complex and require difficult professional decisions to be made. Each decision must be made on a case by case basis in liaison with the DSL, Pastoral Leader or Deputy DSL. The safety of the victim and the support given to them is essential, and they should never be made to feel ashamed for making a disclosure. Should you have concerns about any child who may be harmed or at risk of harm around this area, you should discuss with the DSL or Pastoral Leader and follow the in-school process.

KCSIE 2025 Part 5 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, including 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)

Considering confidentiality and anonymity.

A whole new section has been added to KSCIE (2025) related to 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. Contextual safeguarding argues that "zero tolerance" policies for harm, like sexual harm, are often ineffective because they are blanket, punitive approaches that don't address the complex contexts and relationships that cause harm. Research suggests these policies can discourage student disclosure, limit staff decision-making, and fail to tackle the root attitudes that lead to abuse, while also disproportionately affecting marginalized students. Instead, contextual safeguarding focuses on understanding and addressing the specific social, school, and online environments where harm occurs.

Risk Assessments

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.

Impact on any siblings

It is important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

11. x: Child Criminal Exploitation - County Lines

The exploitation of children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns is known as ‘County Lines’. It is a geographically widespread form of harm, perpetrated by drugs gangs or individuals who groom and exploit young people, including those (though not exclusively) who may have been trafficked. It should be noted that this practice is still exploitation, even if it appears consensual. It is illegal and involves criminal exploitation.

The definition of Child Criminal Exploitation, which can be found on KCSIE (2025), is:

“CCE is 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; and
- children who regularly miss school or education or do not take part in education.

‘County Lines’ is:

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 (2025).

What is cuckooing?

Cuckooing occurs when a vulnerable individual is exploited in their home by groups or individuals so they can use the property for criminal purposes. This may range from using the premises to store, supply and cut drugs and other criminal behaviours. The term comes from the behaviour of cuckoo birds who take over the nests of other birds.

Victims of cuckooing are usually targeted by individuals looking to exploit vulnerable people. This could include people with mental health issues or physical disabilities, lonely, isolated people, or people who have or had an addiction problem. They will often establish a friendship or relationship with the victim to be granted easy access into their home and then they will threaten to cause them harm if they tell anyone.

Once an individual gains access, they will often invite a larger group to attend the property. Before you know it, the vulnerable person is outnumbered and overwhelmed and would be unable to remove them from their home. It is common for these perpetrators to use a property for a short amount of time, moving addresses frequently to reduce the chance of being caught.

Signs and Indicators of cuckooing
There are ways to tell if cuckooing is occurring in someone's home. These include:

- an increase in people entering and leaving the vulnerable person's property at any given time
- an increase in anti-social behaviour exhibited by the people at the address
- an increase in the number of people, usually young, gathering at the address
- damage to the property
- signs of drug use or an odour of drugs coming from the property
- you have not seen the person who lives there recently and, when you have, they appear to be anxious or distracted or even have physical injuries or bruising

11. xi • Children who are lesbian, gay, bi, or trans (LGBT)

See KCSIE (2025), page 49
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 Norwood Green Junior School, we endeavour to reduce the additional barriers faced by proving a safe space for them to speak to the Pastoral leader.

Appendix A: Legislation and local area documents relating to this policy

Legislation:

Children Act 1989, 2004
Education Act 1996, 2002 (Section 175)
Keeping Children Safe in Education, DfES, 2025 (Part One and Annex A must be read for those working directly with children)
Working Together to Safeguard Children, DfE, 2018
Supervision of Activity with Children, DfE, 2013

Promoting the Education of Looked After Children, and previously looked after children (2108)
Children who are absent from Education, DfE 2016
The Prevent Duty: Departmental Advice for Schools and Childcare Providers, DfE 2015
Mandatory Reporting of FGM – Home Office / DfE 2016 (Duty in force from Oct 2015)
'What to do if you think a child is being abused' (DfE 2015)
'Information Sharing' Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE 2018)
Regulated activity in relation to children: scope (DfE 2012)
Sexual violence and sexual harassment between children in schools and colleges (DfE 2018)
Child Sexual Exploitation (DfE 2017)

Local area procedures:

Children's Social Care Thresholds Guidance & Assessment Protocols Statutory & Common Assessment Frameworks (HCSB, 2016)

Hounslow Children's Safeguarding Partnership: http://www.hscb.org.uk

Appendix B: Related school policies and practices

The following school policies should be read and viewed in conjunction to the Child Protection and Safeguarding Policy:

- Recruitment Policy
- Health and Safety Policy
- Behaviour Policy
- Anti-bullying Policy
- Allegations of Abuse of Children Made Against Teachers and Other Staff
- Allegations of child on child abuse.
- Whistleblowing Policy
- Disability Access Equality Scheme & Policy
- Access Action Plan
- Complaints Policy
- Conduct, Discipline and Grievance Policy
- GDPR Data Protection Policy
- Relationships Policy
- PSHCE Policy
- E-safety Policy
- Computing Policy
- Acceptable Use Agreement
- Admissions Policy
- SEN policy
- Staff Induction programme
- Supporting Children with Medical Conditions Policy
- Permissions for Photography
- Home-school agreement
- Looked After Children (LAC) Policy
- Camera & Image Use Policy

Appendix C: Child protection - stage by stage

Bringing concern over a child's welfare to the attention of the child protection team sets in motion a cascade of assessments, meetings, monitoring and intervention. This process might seem unduly complicated. However, it is designed to ensure that: the child's needs are considered at all stages; that information is shared by all relevant professionals; and that the family is offered all possible support.

Moreover, it allows a child to be removed immediately from any imminent danger whatever stage of the process they may be at.

Within ten days of receiving a referral, the child protection team must make an initial assessment of the case (although urgent cases should be dealt with much sooner than this). This initial assessment is designed to gather information about the child's circumstances. The social worker will meet with the child, the family and liaise with other relevant professionals such as teachers, health visitors, police and healthcare staff.

What happens next depends on the findings of this initial assessment.

The assessment may find that the child is not at any immediate risk of harm. In this case the social worker will arrange for any necessary additional support to be provided to the child and family. The case will then be reviewed and closed when appropriate.

If the child is found to be disabled or the assessment finds that their health and development is likely to suffer without local authority intervention, the child will be classed as in need, as defined by Section 17 of the Children Act 1989. This means that the local authority is now legally obliged to provide the necessary services and support.

If the assessment finds that the child has already suffered or is at risk of significant harm, then the child protection team will convene a Strategy Discussion. This is a meeting between child protection staff and other relevant bodies such as the police, school, healthcare staff and any professional involved in the initial referral. The Strategy Discussion may then decide to launch a Section 47 enquiry. This means the local authority must investigate the case further.

Section 47 enquiries are conducted through a Core Assessment, carried out by an experienced child protection social worker. This builds on the information already received and may require specific examinations by other professionals (medical, psychological, emotional or developmental tests).

The outcome of a Section 47 enquiry may range from 'no further action necessary' through 'further monitoring needed' to the convening of a Child Protection Conference.

The initial child protection conference involves the child (if of appropriate age and understanding), family members and those professionals most closely involved in the case. It is designed to consider all the information obtained under the Section 47 enquiry and to determine the best course of action. A core group of those present continues to meet after the initial child protection conference to monitor the case's progress.

One of the things the child protection conference considers is whether the child should become subject to a Child Protection Plan.

The overall aim of a child protection plan is to ensure the child is **safe from harm and remains that way**. As long as it is in the best interests of the child, this will involve offering support and services to the family. A typical plan would:

- Describe the needs of the child and what services are required to meet these needs
- Include specific child-focused outcomes
- Contain realistic strategies to achieve these outcomes
- Set out when and where the child will be seen by the lead social worker
- Identify the roles and responsibilities of family members and professionals
- Include a contingency plan in case circumstances change and require prompt action
- Describe how progress will be reviewed and judged.

The child protection plan is explained and agreed with the child in a way that they will understand. The plan is reviewed after three months and at intervals of no more than six months thereafter. Child protection plans remain in force until the child is no longer considered at risk, moves out of the local authority area (in which case the receiving authority should convene its own child protection conference) or reaches the age of 18.

Care proceedings

No child can be taken into care without a court order that grants responsibility to the local authority. These orders are usually issued by magistrates in the Family Proceedings Court although more complicated cases may be held in the county or high court. A number of different orders may be made depending on the child's circumstances.

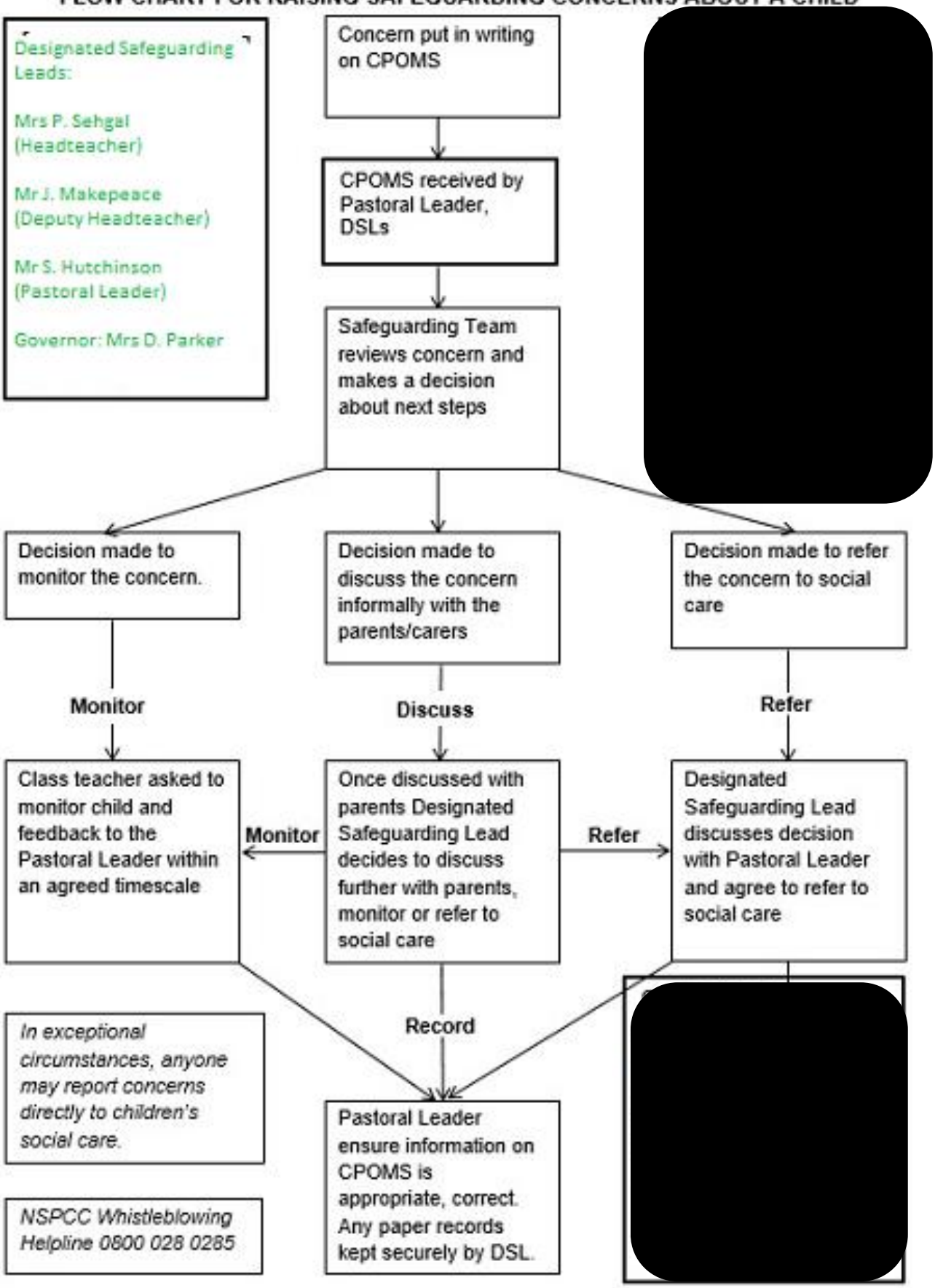
These include:

- **Emergency Protection Orders** made under Section 44 of the Children Act 1989, these orders are issued to ensure the short-term safety of a child. They are usually made when the local authority's Section 47 enquiries are being frustrated and the child protection team feel they need urgent access to the child. In exceptional circumstances, an EPO may be

granted without notice to the parents. EPOs are granted for a maximum of eight days but can be extended for a further seven days

- **Care Orders** made under Section 31 of the Children Act 1989, Care Orders are usually issued when a child protection conference or review of a child protection plan decides that it is necessary to take the child into care. Care Orders continue until the child is 18 unless they are discharged earlier. The Care Order allows the local authority to decide where the child will live and with whom. However, children in care must be allowed 'reasonable' contact with their parents
- **Voluntary accommodation arrangements** made under section 20 of the Children Act 1989. These are made with the consent of parents and often at their own request. The local authority does not acquire parental responsibility although they undertake day-to-day parental responsibilities for the child on behalf of the child's parents
- **Supervision Orders** made under Section 31 of the Children Act 1989, Supervision Orders are usually used to protect a child or young person from their own behaviour. They may be used to require the supervised child to live at a specified place, meet certain people (e.g. their social worker) at certain times or to participate in certain activities at certain times. Supervision Orders last for one year
- **Secure Accommodation Orders** made under Section 25 of the Children Act 1989, these orders permit a local authority to place a child in secure accommodation. They are usually used for looked after children with a history of running away or who may be a risk to themselves or others. They can be made for up to three months on the first application and then for periods of up to six months thereafter. Children under the age of 13 cannot be held in secure accommodation without the consent of the Home Secretary.

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



Appendix D: The role of the designated safeguarding lead (DSL)

Taken from Appendix B, Keeping Children Safe in Education,2024

The Governing Body should ensure an appropriate **senior member** of staff, from Norwood Green Junior School **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads
It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, including the Pastoral Leader the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Manage referrals
The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others
The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs ~~or the named person with oversight for SEN in a college~~) 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
- act as a source of support, advice and expertise for all staff.

Training
The designated safeguarding lead, Pastoral Leader, and Deputy DSLs should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding leads and Pastoral Leader should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.

- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support Norwood Green Junior School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college including understanding and monitoring the school's filtering and monitoring systems
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures Norwood Green Junior School may put in place to protect them.

Raise Awareness
The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Norwood Green Junior School in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- be aware of pupils who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

Child protection file
Where children leave Norwood Green Junior School the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. In most cases, this will involve predominantly the online transfer of CPOMS records. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability
During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in Norwood Green Junior School to discuss any safeguarding concerns. It is a matter for Norwood Green Junior School and the Pastoral Leader to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Appendix E: Role of the Governor for Child Protection and Safeguarding

The role and responsibilities of the governor responsible for safeguarding can be summed up as follows:

- Keep up to date with statutory guidance relating to safeguarding and child protection and any advice issued by the local safeguarding children board (LSCB)
- Attend training for safeguarding link governors
- Ensure the governing board has suitable and up-to-date policies for:

  Safeguarding / Child protection

  Staff code of conduct/staff behaviour

  Handling allegations against staff and volunteers
- Ensure the school has appropriate safeguarding responses to children who go missing from education, to help identify the risk of abuse, neglect and exploitation and help prevent further incidents
- Ensure the school has appropriate online filters and monitoring systems in place
- Report back to the full governing board about safeguarding issues and developments
- Encourage other members of the board to develop their understanding of their safeguarding responsibilities
- Make sure the school has appointed a designated safeguarding lead (DSL) and appropriate deputies
- Make sure the school has appointed a designated teacher to promote the educational achievement of looked after children, and that this person has appropriate training
- Meet regularly with the DSL to monitor that the school's policy and procedures are effective and all staff, governors and volunteers have had the appropriate level of training (as applicable)
- Make sure the DSL has sufficient time, resources and training to carry out their role effectively
- Ensure the curriculum covers safeguarding, including online safety
- Monitor the single central record (SCR) alongside the DSL to ensure the school carries out the appropriate recruitment checks on staff and trustees*

The governor for Child protection and safeguarding should take a strategic approach to monitoring your school's safeguarding arrangements and not be involved at a procedural level. They would not be expected to deal with specific safeguarding incidents and allegations against staff. The headteacher leads if allegations are made against staff. The chair will take the lead if allegations are made against the headteacher. They should immediately discuss these allegations with the local authority designated officer (LADO). This is explained in paragraph 194 of Keeping Children Safe in Education (2025).

Governors should have an overview of the number of safeguarding cases and be confident that systems and processes are working, but you should not know the details of individual incidents. The Pastoral Leader will provide you with this information through regular **safeguarding reports**.

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 (2025), paragraph 81.)

Appendix F: Safeguarding governor monitoring

Monitoring date:
To be submitted to Governors:

Roles and responsibilities

Safeguarding policy or procedure	Timescale	Compliant?	Notes / Action (if applicable)
The governing board has appointed a senior member of staff as the designated safeguarding lead	As necessary		
The governing board has appointed a designated teacher to promote the educational achievement of looked after children (LAC) and previously looked after children, and this person has appropriate training	As necessary		

Training

Safeguarding policy or procedure	Timescale	Compliant?	Notes / Action (if applicable)
The designated safeguarding lead, Pastoral Leader and any deputies undergo updated child protection training	Every 2 years		
The Pastoral Leader, designated safeguarding lead and any deputies also refresh their knowledge and skills regularly (at least annually)	In line with advice from Hounslow SCP		
The Pastoral Leader, designated safeguarding lead and any deputies (as a minimum) have Prevent awareness training	In line with advice from Hounslow SCP		
All staff members have child protection training which is regularly updated, and they receive safeguarding and child protection updates as required (at least annually)	Annually		
All staff have the skills, knowledge and understanding to keep looked after and previously looked after children safe	Governing board to determine		
At least 1 of the people conducting an interview has undertaken safer recruitment training (this is a requirement for maintained schools and good practice for academies)	As necessary		
All governing board members have training about safeguarding	In line with advice from Hounslow SCP		

Policies and procedures

Safeguarding policy or procedure	Timescale	Compliant?	Notes / Action (if applicable)
An effective child protection policy is in place and available publicly (The policy should describe procedures which are in accordance with government guidance and refer to locally agreed multi-agency safeguarding arrangements put in place by the LSCB/local safeguarding partners)	Review annually		
There are procedures in place to handle allegations of child on child abuse and to minimise the risk of child on child abuse (See paragraph 95 of Keeping Children Safe in Education for a list of what your child protection policy should include on this)	Review annually		
A statement of procedures is in place for dealing with allegations of abuse against staff and volunteers (this might be included in your child protection policy)	Review annually		
There are clear procedures in place for protecting children at risk of radicalisation (these might be included in your child protection policy)	Review annually		
There are clear safeguarding procedures in place for protecting children who go missing from education (these might be included in your child protection policy)	Review annually		
There is a clear policy on the use of mobile technology in the school, including 3G and 4G (this might be included in your child protection policy)	Review annually		
There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns (or would have been if they had not resigned)	Governing board to determine frequency of review		
A staff behaviour policy (code of conduct) is in place	Governing board to determine frequency of review		
Written recruitment and selection policies and procedures are in place	Governing board to determine frequency of review		
Appropriate whistleblowing procedures are in place	Governing board to determine frequency of review		

All staff are aware that they must raise concerns related to female genital mutilation (FGM) with the designated safeguarding lead (or deputy), and that there's a specific legal duty on teachers to report a discovered act of FGM to the police	Ongoing		
There are clear processes and principles for sharing information within the school and with the LSCB/local safeguarding partners, other organisations, agencies and practitioners as required	Governing board to determine frequency of review		
Relevant staff: • Have due regard to the data protection principles, which allow them to share personal information • Are confident of the processing conditions which allow them to store and share information for safeguarding purposes • Are aware that, if they need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information	Ongoing		

Safeguarding policy or procedure	Timescale	Compliant?	Notes / Action (if applicable)
The single central record (SCR) is up-to-date and all staff and governors have had the relevant checks where applicable (Please note: checks carried out on maintained school governors and local governors in an academy trust don't need to be recorded on the SCR under the latest version of Keeping Children Safe in Education, but we recommend they are included.)	This is a live document, and so should be updated immediately. Governors could check this termly or when new staff join the school. The lead Governor for Safeguarding should make a full check every year.		
The school is meeting its duties with respect to the childcare disqualification requirements (early years/primary)	Ongoing		

Teaching and learning

Safeguarding policy or procedure	Timescale	Compliant?	Notes / Action (if applicable)
Children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. They are taught to recognise when they are at risk and how to get help when they need it. We teach children to recognise when they are at potential risk, including when on online situation feels unsafe or when crossing roads.	Governing board to determine how often this is reviewed		

Appropriate internet filters and online safety monitoring systems are in place (without 'over blocking')	Governing board to determine		

Appendix G: Training Programme

This appendix outlines the formal training programme. It does not take account of the on-going training and awareness sessions throughout the year.

Who?	How often?	Content?
New staff: Teachers, LSAs, Office staff, Caretaker Non-employed staff: Volunteers	Induction upon starting at NGJS, in addition to the areas below.	• What is safeguarding? • What is your role and responsibilities in relation to safeguarding and promoting the welfare of children and young people? • How do you provide a safe environment for children? • Who is the Designated Safeguarding Lead (DSL) and alternates in your school? • What are the categories, signs and indicators of abuse? • What is the procedure in your school for disclosures and how do you record these in your school? • Where would you find the school's safeguarding policy? • Who is the named Safeguarding Governor or Chair of Governors and how would you contact them • Who would you speak to if you have concerns about a member of staff? • Who would you speak to if you have concerns about the Headteacher? • What are the professional standards of conduct in this school? • KCSiE Part 1 and Annex A to be read and discussed • What is new in KCSIE this year? • Where in the school is Safeguarding information displayed and updated? • Safeguarding Policy to be read and discussed • What procedures are to be followed for Children who are absent from Education? • How does the school's behaviour policy support safeguarding? • The use of CPOMS to record and manage incidents and concerns and the role of the Pastoral Leader.
Teachers LSAs Office staff	Annually – September, upon start of new academic year	• Refreshers on the above • Policy refresher • KCSiE Part 1 and Annex A to be read and discussed • What are our local area issues? FGM, CSE, DV, Prevent, Gangs and violence • What other specific issues make children vulnerable? Child criminal exploitation such as County lines, drugs and alcohol, child on child abuse including sexual violence and sexual harassment, e-safety • How do we ensure e-safety? • What should you do if you feel the safeguarding procedures are inadequate? • What is meant by Contextual Safeguarding and how does this support keeping children safe?
Governors	On-going, but with formal training bi-annually *	• What is safeguarding? • What is your role and responsibilities in relation to safeguarding and promoting the welfare of children and young people? • KCSiE Part 1 and Annex A to be read and discussed • Safeguarding Policy to be read and discussed • What is the role of the safeguarding governor and Looked After Children governor and their deputies? • Is the school compliant in its safeguarding duties? (reports from HT and monitoring from Safeguarding Governor annually)

DSL, Deputy DSLs and Pastoral Leader	Annually	The DSL (and deputy DSLs) need regular training to ensure the following: • An understanding of their role and responsibilities in order to support effective safeguarding in school (Appendix D: Role of the DSL, taken from KCSiE, 2025) • What information is required by governors in order for them to meet their obligations? • What information is required by the local safeguarding board to support an understanding of developmental needs in safeguarding practices? • Knowledge of new developments and issues, procedures and practice
SMSAs	Annually *	• What is safeguarding? • What is your role and responsibilities in relation to safeguarding and promoting the welfare of children and young people? • How do you provide a safe environment for children? • Who are the Designated Safeguarding Lead (DSL) and deputies in Norwood Green Junior School? • What are the categories, signs and indicators of abuse? • What is the procedure in your school for disclosures and how do you record these in your school? • Where would you find the school's safeguarding policy? • Who is the named Safeguarding Governor or Chair of Governors and how would you contact them • Who would you speak to if you have concerns about a member of staff? • Who would you speak to if you have concerns about the Headteacher? • What are the professional standards of conduct in this school?
Cleaners	Biannually *	• What is safeguarding? • What is your role and responsibilities in relation to safeguarding and promoting the welfare of children and young people? • How do you provide a safe environment for children? • Who is the Designated Safeguarding Lead (DSL) and alternates in your school? • What are the categories, signs and indicators of abuse? • Who would you speak to if you have concerns about a member of staff? • Who would you speak to if you have concerns about the Headteacher?
Cooks	Via Wilson Jones Catering company – 3-year certification	In addition to Wilson Jones internal Safeguarding training, the school will train in the following: • What is safeguarding? • What is your role and responsibilities in relation to safeguarding and promoting the welfare of children and young people? • How do you provide a safe environment for children? • Who is the Designated Safeguarding Lead (DSL) and alternates in our school? • What is the procedure in your school for disclosures and how do you record these in your school? • Who would you speak to if you have concerns about a member of staff? • Who would you speak to if you have concerns about the Headteacher?

***** If new legislation is brought in, this will be updated with staff irrespective as to the timescale in process.

Appendix H: Virtual college – Safeguarding e-Learning info

The Virtual College has moved to https://hounslowscp.vc-enable.co.uk/

Previous accounts are still valid.

Appendix I: Advice to adults when dealing with disclosure of abuse

Dealing with incident of disclosure

If a child chooses to disclose to us we may have feelings of anger, disgust, revulsion, sorrow or fear. The child may also be feeling many of these emotions but also accompanied by confusion, responsibility, guilt, insecurity, fear, inability or reluctance to trust adults. There are things that we as adults can do. We can try to:

- Stay calm - the child needs us to be composed and in control.
- Listen carefully - and sympathetically without probing.
- Don't put words into the child's mouth (by doing the describing for them or completing their sentences or by attempting to translate slang or dialect words, etc.).
- Note - the main points calmly and carefully.
- Repeat - these to make sure that they have been properly understood.
- Give positive reinforcement to the child and tell and show the child that:
    - it was right to tell
    - we are glad they told us
    - we believe them
    - it was not their fault
    - we are sorry that it happened
    - what happened may be a crime
    - things like this happen to others too
    - that we will do what we can to help to protect and support them
- **Do not promise them that they can tell you in confidence – make it clear that in order to help them you will need to pass this information on. However, reassure them that doing this will help them.**
- Praise - and help the child to feel strong by telling them that they did something well or bravely, etc
- Discuss - what has happened with the Pastoral Leader, DSL or Deputy.
- Follow the Hounslow procedures - these are outlined in the document 'Safeguarding and Promoting the Welfare of Children and Young People in Schools and Education Settings' – Hounslow Child Protection Guidance and Procedures for Schools and Education Settings, (Dec 2011). It is kept within Safeguarding File 1. For a child resident outside of Hounslow, please speak to the Pastoral Leader. Forms and paperwork for other local authorities are at Admin Share/Pastoral Leader/Forms/LB Ealing(e.g.) however most Las will now accept online referrals.
- Look after the child while arrangements are being made.
- Make the rest of the day as normal as possible for everyone concerned (i.e. the child, the other children and yourself).
- Write up a full account for CPOMS as soon as possible and before the end of the day.

Dealing with suspicion of abuse

Suspicion can often be more difficult to deal with than disclosure as we may be left with unresolved feelings of anger and frustration because the matter cannot be proven one way or the other, as well as those detailed in the section on disclosure. Again, however there are things that we can do:

- Stay calm - the child needs us to be composed and calm.
- Be available - no doubt you have already worked hard to create an atmosphere of stability, security and trust within the classroom. It may be useful to be available sometimes or lunch time as a matter of routine.
- Listen actively - to what the child is saying to others and us.
- Question normally - without pressurising (ignoring something said, written or drawn is not what we would normally do. Try to make questions open-ended e.g. "Can you describe what this shows?")
- Don't put words into the child's mouth (by doing the describing for them or completing their sentences etc.).
- Keep a full record or log - dates, times, what the child did, said etc. This can be kept confidentially.
- Discuss your views - with the Pastoral Leader who may well have other information to add. If there are a number of worrying signs or symptoms or a strong "gut feeling" the Duty Officer at Social Services/Front Door staff/Education Link Social Worker or groups such as ESW Cluster and CAPP can be contacted for advice.

Appendix J: Contacts

[redacted]

[redacted]

[redacted]

Chronology Sheet

Name _____

Date	Time	Comment	Action	Initial

Concern Form

Please complete this form if you have any concerns about a pupil

Pupil Name			
Day/Date/Time		DoB	
Member(s) of staff noting concern			

Concern
REMEMBER TO ONLY USE THIS FORM IF CPOMS IS UNAVAILABLE – IF IN DOUBT SPEAK TO THE PASTORAL LEADER Signature: Date:

Actions Taken			
Date	Person acting	Action	Signature

Please pass this form to the Designated Safeguarding Lead when completed

Guidance on recording concerns using CPOMS or Concern Forms

CPOMS

CPOMS is our primary recording system for reporting and recording concerns. It is important that CPOMS is used in a timely way. The details are important.

To help the safeguarding team respond appropriately, please follow the guidance below:

- Make sure the concern is given in detail, preferably in the child's own words
- Don't report what other people have told you - they must write their own concern form
- Remember that CPOMS records can be used in court cases and inquests as primary documents, so they must be complete and accurate.
- If you jotted your notes down on a piece of paper whilst talking to the student or immediately afterwards, scan and add to CPOMS
- Be aware that CPOMS entries go to the Pastoral Leader and some also to the wider DSL team and SENDCO – they will initiate further actions where required. They may require further actions from specific members of staff and those staff will be notified via a CPOMS email to their staff email accounts. These actions should be followed up in a timely manner and a response added onto CPOMS.

If CPOMS is unavailable for use:

- A Concern Form should be used to record your concern. Do not use other any other form or piece of paper. Writing on the back of other forms can cause confusion and error.
- If there are no Concern Forms available in the file, please ask the office to print one: Admin/newadmin/Headteacher/CP & Safeguarding/Forms2017/Concern form.
- Sign, date and time the concern form
- Finally, contact a member of the safeguarding team: completed concern forms must be passed by hand to the Pastoral Leader, Designated Safeguarding lead (DSL), or deputy DSLs. Should they not be in school, please ring them to report. Should they be unavailable, contact the School Business Manager to continue to obtain contact.

Meeting form

Date: _____

Type of meeting: _____

Name of child: _____ Class: _____

Those present: _____

Notes	Action required?

Pupil Voice Form

Pupil Name			
Day/Date/Time			
Member(s) of staff recording:			

What happened and when did it happen?
How did it make me feel?
Did I tell anyone?

What would I like to happen?
Did anyone see what happened?
Signature: Date:

Actions Taken			
Date	Person acting	Action	Signature

Professional Information Sharing Form

Date: _____

Name of child: _____ Class: _____

Phone call from / to: _____

Role: _____

Contact phone number: _____

Notes	Action required?

Appendix L: Investigation of alleged abuse involving children with SEN and / or SEND.

A child with a disability is a 'child in need' under Section 17 of the Children Act 1989.

General

Children with disabilities have increased vulnerability to being abused, but the safeguards employed should be the same, and of the same standard, as those applied to all children. Their vulnerability may be as a result of their dependence on others, isolation, communication difficulties, increased susceptibility to bullying by peers and even the feelings and responses of professionals.

Children with disabilities are children first, and The Children Act 1989 principles apply, namely:

- Duty to promote and safeguard the child's welfare
- Duty to promote access to services
- Duty to work in partnership with parents and to recognise their special needs as parents
- Duty to consider the views of parents

Recognition and referral

Recognition of abuse in a disabled child may require specialist skills or links with appropriate adults who know the child well.

For referring agencies, the process of referral is the same for all children, but it may be appropriate to involve relevant specialists in addition to the standard agency checks and enquiries under child protection procedures. This might be done as part of the duty social worker's "initial" enquiries, or by the investigating team once a Section 47 investigation has been commenced, or both.

Investigation

Special care will be needed to ensure the best possible communication with children with disabilities, who have the same rights as other children in respect of:

- Information about the process of the investigation
- Access to Social Services records
- Consent/refusal to medical examination
- Ascertaining their wishes and feelings

Interviews will need to be particularly carefully planned at the strategy meeting, and the decision as to whether to formally interview a disabled child should be a joint decision involving child protection workers, the police and a professional familiar with the child and their disabilities.

Preparation for interview might involve:

- Familiarisation with the child's way of communicating
- Taking advice from someone who knows the child well
- Seeking specialist professional advice
- Involving a known, trusted adult in the interview
- Ensuring accessibility of interview room

Where medical examination is required, it is important to consult with the relevant consultant paediatrician (and the relevant named doctor for child protection, if not the same.)

There should not be an assumption made about the inability of disabled children to give evidence in criminal proceedings. Every child should be carefully assessed and given support to take part in the criminal process if this is considered to be in their best interests and the interests of justice.

Possible sources of specialist professional advice for agency staff or child protection investigator

- Paediatrician/named doctor
- Community nurse (learning disabilities)
- Teacher/head teacher
- Teaching Support Service, which includes a Hearing Impairment Team, a Visual Impairment Team and a Physical Disabilities Team.
- Respite Care Unit (if child known)
- Specialist social worker (children with disabilities)

Note: Specialists helping should be familiar with child protection procedures

Who could be brought in as a trusted adult to advise and assist interviews?

- Parent (if not the subject of the allegation)
- Another adult relative/family friend
- Teacher/teaching assistant
- Link carer
- Visitor/contact from voluntary organisation
- Teachers of the Deaf are **not** expected to provide BSL translation during Child Protection meetings.

Appendix M: Reporting Duty for FGM

Female Genital Mutilation (FGM)

Keeping Children Safe in Education: September 2025

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. It is believed that the majority of cases happen between the ages of 5 and 8.

Indicators

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.

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

Mandatory Reporting Duty
Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers[1], along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty commence in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's safeguarding leads and involve children's social care as appropriate.

For further more detailed guidance sees:
Mandatory Reporting of FGM – Home Office / DfE 2016
https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

FGM: Multi-agency Statutory Guidance on Female Genital Mutilation, 2016
https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

FGM helpline: 0800 028 3550

[1] Section 5B (11) of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) provides a definition for the term 'teacher'.

Appendix N: The Prevent Strategy

The Prevent duty: what it means for schools and childcare providers

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be susceptible to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

At NGJS we build pupils' resilience to radicalisation by promoting our NGJS British Values and enabling children to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge these.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. Even very young children may be susceptible to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must act when they observe behaviour of concern.

School staff need to know when it is appropriate to make a referral to the Prevent team which may result in a referral to the Channel programme. Staff training on the Prevent duty should be undertaken for all members of staff. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism.

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 radicalised, 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. Staff should be alert to changes in children's behaviour, which could indicate that they may need 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 Pastoral Leader 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

What to do if you have a concern

1. If a member of staff has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing with the school's designated safeguarding lead, and where deemed necessary, with children's social care.

2. The **main point of contact** initially will be the London Borough of Hounslow's Prevent team (contact details below) who will offer advice and support. Following discussion, a Susceptible to Terrorism Form may be completed via the Designated lead

   Please note: You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice. The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

3. Following this referral, the Prevent team may decide to
   - Not take further action they felt there were no serious concerns
   - Refer to the Channel Panel for Hounslow in cases where they feel there is a valid concern
   - Create a Merlin thereby referring onwards for Safeguarding procedures

Other aspects of Prevent / the Channel programme to note:

- 'Prevent' works within a pre-criminalisation window: the team / process attempts to intercept someone susceptible to extremist behaviours.
- The Prevent team or Channel programme cannot force someone to engage in the process
- There is a statutory duty to have due care to report someone who might be drawn into extremism

Prevent in Schools

Why Prevent in schools is important?

1. Statutory Duty to protect vulnerable children – 'The Prevent duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.'

2. Children and young people can easily be exposed to extremist ideology. Research suggests they are the most targeted group by radicalisers, this information can be found on the statistical published document - 'Individuals referred to and supported through the Prevent programme, April 2016 to March 2017'. This can make it difficult for young people to develop and grow within their social and educational life. This also poses a very real risk that our young people could potentially, be groomed to support or partake in an act deemed to be an Act of Terrorism.

Channel Referral – Open Source documentation (https://www.gov.uk/government/organisations/home-office**)**

-
- **Between April 2017 and the end of March 2014, Channel (Channel is the multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism) received a total of 1450 referrals for young people under 18 years of age at the time they were referred.'** - National Channel Referral Figures, ACPO

It's crucial to note here the vital role that schools (all) play in safeguarding children. '**Keeping Children Safe in Education'** https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Hounslow Prevent and Counter Extremism Team

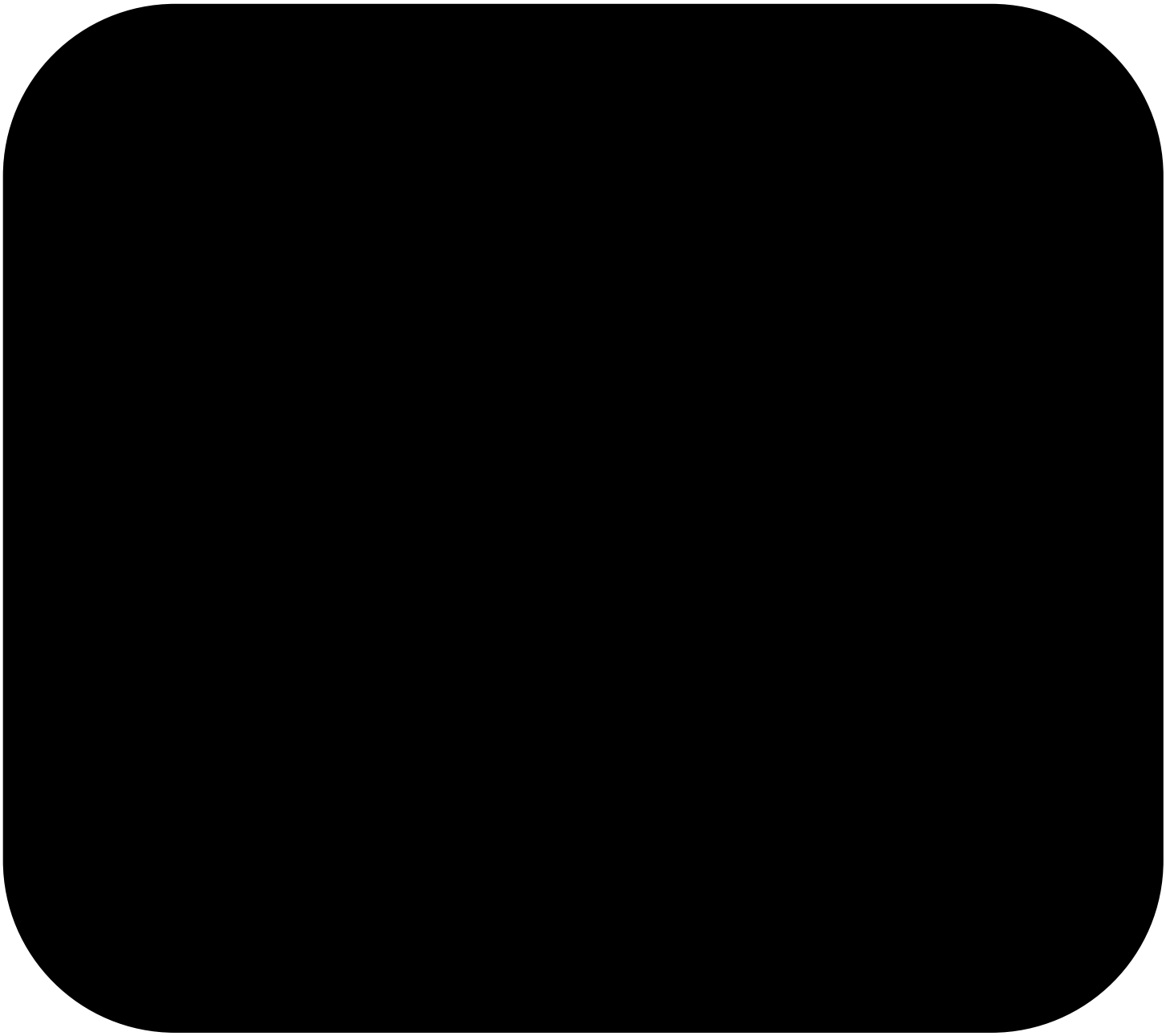
'Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm'

What tangible support is available?

Locally – Hounslow's Prevent and Counter Extremism team are able to offer advice and support for education establishments in a number of ways, these include but are not limited to:

- The offer of FREE training including WRAP3 (WRAP4 Unveiled late 2018) for all staff – delivered by highly skilled and experienced staff.
- Access to current educational tools e.g. Educate Against Hate website and the London Grid for Learning,
- Support to schools in carrying out a review of existing safeguarding (Prevent) policies and procedures to ensure they comply with the Counter Terrorism & Security Act 2015 – Prevent Duty (hyperlink here)

- Support for schools in the adaptation of the curriculum to address the emerging issues / threats Access to the Prevent and Counter Extremism team who can support with key issues around radicalisation, extremism, cohesion and Counter extremist behaviours.



Person Susceptible to Radicalisation (VTR) Referral Form

(RESTRICTED WHEN COMPLETE)

Please note – if you are making a referral - If you are concerned someone may be imminently travelling to an area of conflict please dial 999

Person of Concern

Full Name: (*include other known names/maiden name etc)*
Gender:

Date and place of birth:

Full Address:

Phone number(s):

Parents'/Guardian/ Carers Details: *(include other known names/maiden name etc)*
Full Name (Father):
Full Name (Mother):
Full Name (Foster carer):

Date and place of birth:
(Father):
(Mother):
(Foster carer):

Full Address:

Phone number(s):

Children/s/ Siblings' details:

Social Services Team

Is the person of concern in the *care* of the local authority? **Yes** ☐ **No** ☐

Is the person of concern receiving *support* from the local authority team/s? **Yes** ☐ **No** ☐ *If Yes please provide details here.*

Local Authority with corporate responsibility for referee (if not Hounslow):

Named Social Worker:

Contact phone number:

Reasons for Referral:

Background and Risk Issues *(include any chronology if known):*

Process/ procedures applied to verify concerns *(include whom you have spoken to i.e. parents, foster carers, social worker, staff/supervisor and or local police contact):*

Referrer

Referrer's full name and position:

Contact Details and Address:

Tel no: **Mobile:**
(It is important to provide a contact number where you can be reached out of normal office hours)
Email:

If you are unavailable please provide details of a deputy who may be contacted.
Name and position:
Tel no: **Mobile:**
Email:

[redacted]

How does NGJS support the Prevent strategy?

E-Safety:
The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools. We ensure that we have a suitable filtering system in place and regularly teach children to be safe internet users. Parent workshops on e-safety also aim to engage parents with safe working practices at home regarding their child's internet use. The Designated Safeguarding Lead has a responsibility for understanding the filtering and monitoring system. All our responses to e-Safety issues should be informed by two principles – "All online incidents are safeguarding incidents" and "The internet is a Contextual Safeguarding space".

Building children's resilience to radicalisation:
Schools can build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. Schools are already expected to promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values. While topics may not directly relate to radicalisation, teaching pupils to develop their own ideas, thinking though issues and presenting informed arguments will stand them in good stead against radicalisation. Debate training for staff implementation of debate for pupils at NGJS can support this process. In addition, resilience was voted for by pupils as one of our school values and has a high focus through many approaches in school, such as: the ethos established within the learning environment that failure is acceptable and we learn through this and try again, to challenges set within work; to the use of Outdoor Adventurous Activities and team building experiences, etc.

PSHCE & citizenship:
Our Personal, Social and Health Education (PSHE) curriculum is an effective way of providing pupils with time to explore sensitive or controversial issues and equipping them with the knowledge and skills to understand and manage difficult situations. Pupils are taught to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help.

Citizenship at NGJS helps to provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It equips pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In Citizenship, pupils learn about democracy, government and how laws are made and upheld. Pupils are also taught about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.

At the end of this appendix, our British Values document identifies many of the activities undertaken to support the Prevent strategy at an age-appropriate level.

NGJS British Values

Norwood Green Junior School prides itself on being a UNICEF Rights Respecting School, meaning that the UN Convention on the Rights of the Child (UNCRC) is embedded in our ethos and culture; this Convention is based on many of the same values as those listed in the Department for Education's definition of British Values.

We are fortunate to serve a wonderfully diverse community and we welcome and value everyone, whatever their ability, ethnicity, religion, gender, sexuality or background. As a school, we believe we have a vital role in combating discrimination and promoting fairness, justice and equality through our teaching and in the role models we offer. We teach the children to be responsible citizens and positive representatives of the United Kingdom within the wider world. Promoting British Values is, therefore, an intrinsic part of all we do. We specifically promote and reinforce the four key British Values listed by the DfE through our rich topic-based curriculum and also in the following ways:

Democracy

- Children have many opportunities for their voices to be heard.
  School council elections are held at the beginning of each year and all children in Years 3-6 are invited to stand. Councillors (one boy and one girl) are elected from each class after a ballot. The council of children then meets regularly to discuss issues raised by the children in each class. The council has its own influence and is able to genuinely effect change within the school. Their current campaign is around preventing litter in their local area. In Friday Celebrations, once a week, children vote for other children when looking for particular qualities in each other. Once a month children nominate other children for platinum and diamond awards for behaviour, which are presented in our team point assemblies.
- Norwood Green has gained the Rights Respecting Gold Award and are currently a UNICEF Rights Respecting school. Each year the children decide upon their 'class charter rules' and the rights associated with these and all children contribute to the drawing up of the charter rules. Children in Years 3-6 are also involved in a RRSA steering group (also including teachers, parent and governors). They are known as Global Ambassadors. Through the year they develop projects to work on that raise awareness in the school community on aspects of the UNCRC articles. Recently they have worked on projects like Soccer aid covering the right to play and supporting our local care home.
- The School's leadership also strives to model the values of transparency and accountability in its own actions and governance.
- Assemblies take time to consider the implications of national/global events e.g. (General Elections, Referendums, International Women's Day, Remembrance Day) and important dates (establishment of parliament, women get the vote etc.).
- Within classes children learn about the principles of debating and participating in trips to the local council chamber in Hounslow.
- Occasionally, visits also incorporate learning about democracy and the democratic process for example visits to the Houses of Parliament and visits from our local MPs.
- Democracy is studied as part of the legacy of Ancient Greece, the Romans and the Tudors and touched on in many topics covered across the school such WWII and Junior Citizenship Day (run by a local secondary school).

The Rule of Law

- The importance of laws, whether they be those that govern the class, the school, or the country, are consistently reinforced throughout regular school days, as well as when dealing with behaviour and through school assemblies. Pupils are taught the value and reasons behind laws, that they govern and protect us, the responsibilities that this involves and the consequences when laws are broken.
- All families, upon first joining the School, are given a Home-School Agreements outlining their rights and responsibilities so that a purposeful partnership exists between home and school.
- We teach children to distinguish right from wrong, drawing parallels between rule breaking and behaviour management at school and in society generally, involving pupils in understanding what makes a disciplinary action fair and just, and modelling consistency in the exercise of authority.
- Our School Charter outlines some key rights from UNCRC and we reinforce that these rights as unconditional for all children and not dependent on children showing responsibility.
- Where necessary, school assemblies, year group assemblies and class circle times are used to remind children about behaviour expectations and any rule changes to the day-to-day running of the school.
- Certificates are awarded in monthly team point assemblies to celebrate positive behaviour choices the children have made. They also celebrate which class has won the team point cup for each month.

- The school promotes pupils with the responsibility to reinforce school rules through pupil leaders, school prefects, ~~JRSO~~s and play leaders.
- Risk assessments are always written and shared with relevant parties prior to events to ensure everyone is clear on rules that govern events.
- The School's leadership also strives to model the importance of laws in its own actions and governance.

Individual Liberty

- Within school and through our rights respecting ethos, pupils are actively encouraged to make choices and take responsibility for these choices, knowing that they are in a safe and supportive environment.
- Our School places special emphasis on freedom of self-expression, as reflected in our non-uniform days for charity events, special clothes for festival assemblies. In our curriculum pupils are given the freedom to make choices as learners – through learning challenges in lessons, home learning projects and in their extra-curricular activities.
- When opportunities arise through the curriculum, children are taught that as long as we do not break the law, we can live as we choose to and have our own opinions about things.
- To help children develop life-long learning skills that are necessary to be more successful in modern Britain and in the world, they are taught to develop the following (Professor Guy Claxton's) learning habits: resilience, relationships, reflectiveness and resourcefulness.
- Children are taught about growth mindset and how this can help them to turn failures into opportunities to learn and help other people. Teacher's use growth mind set in lesson studies to further develop their professions skills and explore the impacts it can have on children's learning.
- As a school we have a responsibility to provide boundaries and safety for children through rules and regulations but we also allow them opportunities to make mistakes and to learn from their experiences.
- Pupils are encouraged to know, understand and exercise their rights and personal freedoms and advised how to exercise these safely, for example through E-Safety lessons.
- Inclusion through our Deaf Awareness approach.
- Pupils learn to empower themselves through our anti-bullying weeks and develop their self-confidence through our PSHE curriculum.

Mutual Respect & Tolerance of those of Different Faiths and Beliefs

- Norwood Green Junior is situated in a culturally diverse area and there is a strong history and philosophy within the school of celebrating cultural diversity.
- Pupils learn to celebrate and learn about unique characteristics and similarities of people through:
- The RE multi faith curriculum and visits to places of worship
- Festival assemblies
- Cultural celebrations such as cultural evening and celebrating languages event.
- Topical discussions points from Newsround e.g. film stimulus
- Participation in Deaf awareness events
- Pupils learn that they can make a positive difference to the lives of others around the world. We do this through our participation in charity events such as UNICEF's Soccer Aid, Red Nose Day, Genes for jeans and Impact India.
- Our school charter is referenced regularly during the school day and in lessons. Two of the school's six core values on our children's charter state that we will show kindness and inclusiveness to all and instil respect for others. Our charter also states the right all children have to- freedom of thought and religion and the responsibility to respect other people's thoughts and religions.
- Children learn that their behaviours have an effect on their own rights and those of others and all members of the school community are expected to treat each other with respect.
- Our programme of assemblies' addresses understanding and acceptance of different faiths and beliefs through stories and celebrations from a variety of faiths and cultures and RE, PSHE and RRS teaching reinforce this.
- At Norwood Green Junior School, we have a commitment to actively challenge pupils, staff or parents expressing opinions contrary to our school values and fundamental British Values.

Appendix O: HSCB Escalation Policy

Multi-Agency Escalation Policy

The Resolution of Inter-Agency Disagreements about Safeguarding Children

Introduction

The role of an effective partnership is to scrutinise and challenge multi-agency working and the escalation of matters that cause issues on the ground is an essential part of the business of the HSCP and its sub-groups and supports assurance that there is strong and collaborative multi-agency working and improved outcomes for the child.
Occasionally situations arise when professional within one agency feel that the actions, inaction, or decisions of another agency do not adequately safeguard a child. All professionals have a duty to act assertively and proactively to ensure that a child's welfare is paramount in all professional activity, and they must challenge each other where they are concerned that practice is placing children at risk of harm.

Effective working together depends on an open approach, clarity of roles and responsibilities and genuine, and honest, relationships between agencies. Escalation is a process of formally challenging a decision made by professionals and is a means of resolving differences which is an integral part of joint working to continue to safeguard the welfare of children and young people.

Purpose

Stages of the policy

The policy has been developed to support all agencies who are members of the Hounslow Safeguarding Children Partnership (HSCP) to resolve significant strategic and operational professional differences that could impact on the welfare and safety of children and young people. All agencies are responsible for communicating and resolving professional disputes as set out in Working Together to Safeguard Children (2018) and the Pan London Child Protection Procedures (2020).
As the policy is for use by all partners in relation to inter-agency issues, the same timescales and escalation period should apply across all agencies *(although it should be noted that the structural hierarchies may be slightly different in different organisations).*
This policy has drawn on the escalation policies of high performing authorities.
The policy is not designed to replace escalation and complaint processes established within individual partner agencies. Agreed: February 2021 Next Review: February 2024 2

Definitions

Strategic partnership issues – For the purpose of the policy, the definition of strategic partnership issues, is any matter that has a serious impact on the effectiveness of the HSCP and is likely to relate to roles and responsibilities, professional standards, communication and commitment to partnership working.
Operational professional disagreement - The definition of professional disagreement relates to any issue that is likely to or has affected the safety and welfare of a child or young person. It relates to case working and any issues that are identified through the HSCP quality assurance process e.g. case audits and an investigation of a serious incident.

Resolution

Professionals should feel confident to raise concerns and be supported to address issues that arise when there are conflicting professional judgments at an early stage.
Disagreements are most likely to arise around *(this is not an exhaustive list):*

- Levels of need, thresholds and referrals
- Action or inaction by another professional
- Assessment and differences in professional analysis
- Decision making for example Child Protection Conference outcome
- Service provision
- Roles and responsibilities
- Progressing plans
- Communication and information sharing

Professional disagreement can be positive, as challenge allows for review and can develop creative ways of working. However, disagreements can impact negatively on positive working relationships and consequently on the ability to safeguard and promote the welfare of children. Disagreements always require resolution and should be addressed quickly to ensure the child is protected and to avoid issues becoming complex and entrenched.
Principles

All agencies across the partnership have agreed to work in a culture of genuine partnership working and have committed to the following principles:

- The safety and wellbeing of individual children and young people is the paramount consideration in any effective challenge and escalation.
- Effective challenge is a positive action.
- Practitioners should take responsibility for their own cases and actions.
- Any disagreements between agencies should be resolved as simply and quickly as possible.
- Practitioners should respect the views of others, whatever their level of experience, the role they fulfil or agency they represent.

- Practitioners and managers should always be prepared to review decisions and plans with an open mind.

- Working together effectively depends on resolving disagreements to the satisfaction of workers and agencies, with a genuine commitment to partnership working.
- Ensuring that there is clarity about roles and responsibilities through governance, policies, procedures and practice frameworks.
- Encouraging open and honest communication, based on mutual respect for other partners' expertise, experience and organisational restraints.

When any professional considers a child is at risk of imminent significant harm, they must ensure that their concerns are escalated on the same working day using established safeguarding procedures.

Process

Professionals should attempt to resolve differences through discussion within
ONE WORKING WEEK or a timescale that protects the child from harm

(whichever is less)

Stage 1: Professional engagement and challenge (Day 0-5 or less)

In cases where professionals consider a child to be at imminent risk of significant harm, concerns must be escalated to their manager/supervisor and/or safeguarding lead on the same working day.
In cases where there are concerns, but the child is not considered to be at an immediate risk of significant harm, professionals should, in the first instance, attempt to resolve differences or concerns through telephone discussion and/or by face to face meeting with the relevant practitioner/agency within 5 working days or a within a timescale that protects the child from harm (whichever is less).

The person raising a concern must always record the following information and a copy of it must be kept on the records of the child subject of the concern. When the concern is escalated, this written information must be provided:

- Name of the child
- Name of practitioner and agency with whom there is a concern
- Brief description of nature of concern and action already taken to resolve the issue
- Outcome sought; any agreed outcome must be placed on the child's records.

There may be instances where disparity in perceived status or experience may inhibit the ability of some professionals to resolve the disagreement without support.

Stage 2: Involving the Line Manager (Day 5-10 or less)

If the professionals are unable to resolve the matter as outlined in stage 1, the concern must be escalated to their line manager within 24 hours and a resolution should be achieved within 5 working days or a within a timescale that protects the child from harm (whichever is less).

Where concerns are escalated to a line manager, they should be discussed with their counterpart in the other agency. Respective parties must identify explicitly what the problem is and have absolute clarity about the nature of the professional challenge and what each professional aim to achieve. Line managers must always consider convening a professionals meeting if necessary.
The outcome of discussions, resolution or actions agreed must be recorded. If the concerns remain unresolved it must also be recorded and escalated to Stage 3 and the organisation safeguarding representative.

Where a child is subject to a Child Protection Plan (CPP) or a Looked After Child (LAC) the Child Protection Chair or Independent Reviewing Officer must also be notified.

Stage 3: Agency Safeguarding Leads (Day 10-15 or less)

If agreement cannot be reached following discussions between the line managers as outlined in stage 2, the issue must be escalated to their Team Manager, relevant safeguarding leads or Named or Designated safeguarding lead for the agencies concerned within 24 hours.

At this stage the safeguarding leads must work together to consider a strategy to resolve the matter and will communicate the outcome to the individuals and agencies involved. This should be achieved within 5 working days or within a timescale that protects a child from harm.

Stage 4: Head of Service (and if health involvement CCG Designated Safeguarding Professional) (Day 15 – 22 or less)

If a satisfactory resolution to the concern cannot be achieved at stage 3, the safeguarding leads will escalate the matter to the Head of Service or equivalent within their agency within 2 working days or a within a timescale that protects the child from harm (whichever is less).

Senior safeguarding representatives from respective organisations should review the discussions and actions take throughout stages 1 to 3 and provide clear leadership advice and guidance in order to find a solution to resolve the matter and ensure that it is clearly communicated to the professionals involved and actioned quickly. This should be achieved within 5 working days or within a timescale that protects a child from harm.

Stage 5: resolution by Hounslow Safeguarding Children Partnership (HSCP)

If it has not been possible to resolve professional differences in the steps outlined above and/or the discussion raises significant policy issues, the Head of Service or Designated Safeguarding Lead will refer the matter to the HSCP for resolution within 28 days or less, depending on urgency.

The Independent Advisor of the HSCP should be approached to Chair a meeting of the most senior managers with operational responsibility for the case or convene a conflict resolution panel within 1 month of being notified or within a timescale that is appropriate for the issue. This meeting will review the issues at hand and provide a final opportunity for the involved agencies to ensure that there is a full understanding of the issues before the decision is finalised.

The Chair will then report on issues arising from this process to either the appropriate sub-group, partnership board or executive meeting.

Important additional notes:

Record keeping

At all stages of the process, actions and decisions must be recorded in writing and shared with relevant personnel, including the professional who raised the initial concern.

This must include records of any intra and inter agency discussions and actions taken and ensure that this is recorded on the child's file, together with any other written communication and information. If the process highlights gaps in policies and procedures this must be brought to the attention of the Independent Advisor of the HSCP.

Specific circumstances

There are certain instances where the escalation policy should be over-ridden and the Director for Children's Services (DCS) and the HSCP should be made immediately aware by whoever first comes to know. These are instances of:

- Child death where safeguarding concerns are identified
- Life changing injury
- Abduction of child on CP plan or in care
- Immediate threat of judicial review; or
- Imminent threat of media attention

Learning from dispute resolutions

When the issue is resolved or closed, any areas of learning or identified improvement should be considered by the relevant HSCP sub-group. In cases that present specific complexities, consideration should be given to seeking expert advice in respect of evidence-based practice. It may also be useful for individuals to be debriefed following disputes to promote good partnership working.

Appendix 1

HSCP Escalation Policy Flowchart

This timeline is the maximum time allowed. When any professional considers a child is at risk of imminent significant harm, they must ensure that their concerns are escalated on the same working day using established safeguarding procedures.

Stage 1 (Day 0-5) -Professional disagreement arises. Attempts should be made to directly resolve the issue and hold a meeting if required.

Stage 2 (Day 5-10) -If dispute is unresolved escalate to professional's line manager who should liaise with equivalent in other organisation

Stage 3 (Day 10-15) -If unresolved escalate to Team Manager, Named or Designated Safeguarding Lead. Safeguarding leads will work together to resolve the matter and inform relevant professionals of the outcome

Stage 4 (Day 15-22) -If unresolved escalate to Head of Service or service equivalent, *(if health involved CCG Designated Safeguarding professional)* for resolution at senior management level and actions agreed

Stage 5 -(resolution within 28 days) -If unresolved by senior management or if the matter raises significant systemic or policy issues, escalate to Hounslow Safeguarding Children Partnership Independent Chair via Business Manager for resolution.
At all stages/ decisions must be recorded in writing and shared with relevant professionals.

Key Contacts

Norwood Green Junior School

Low-Level Concerns Policy

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1. Introduction

At Norwood Green Junior School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

3. Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024

"407. As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

409. 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 set out at paragraph 338. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

 is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

 does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

 being over friendly with children;

 having favourites;

 taking photographs of children on their mobile phone;

 engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

 using inappropriate sexualised, intimidating or offensive language.

411. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

412. It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings."

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children 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 they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

5. Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

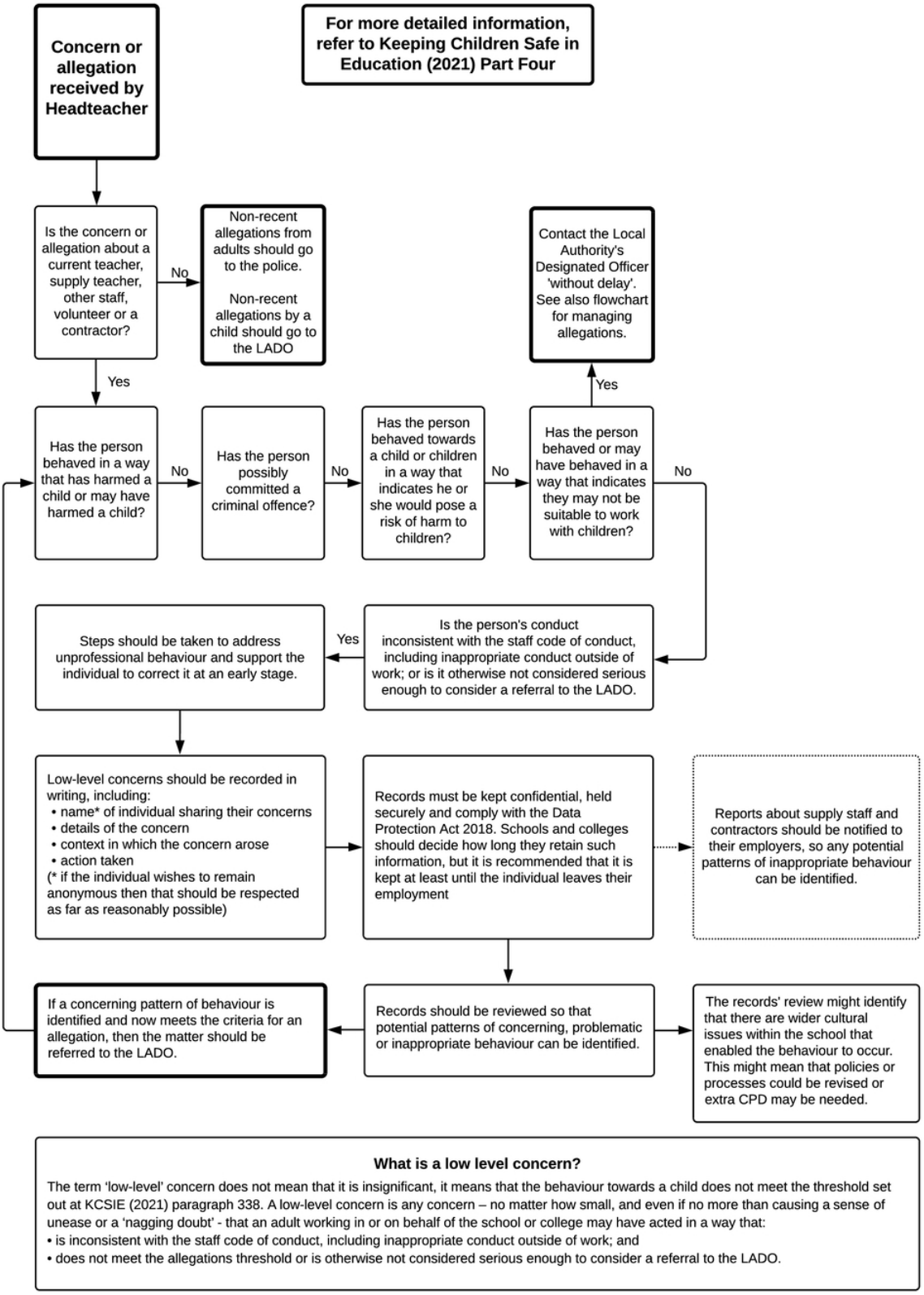
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave NGJS, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

(a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

(b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

6. Process to follow when a Low-Level Concern is raised:



7. Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2024.

https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf

8. Low Level Concern Form

Low-Level Concerns Recording Form

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

• is not consistent with Norwood Green Junior School Code of Conduct, and/or

• relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children. You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

Name of staff member: Signed: Date: Received by:

Policy created on March 2024

Review on March 2025

Appendix Q: Online safety policy

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Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Identify and support groups of pupils that are potentially at greater risk of harm online than others
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

2. Legislation and guidance

This policy is based on the Department for Education's (DfE's) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
-
- Searching, screening and confiscation

It also refers to the DfE's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle

cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

The policy also considers the National Curriculum computing programmes of study.

This policy complies with our funding agreement and articles of association.

3. Roles and responsibilities

3.1 The governing board

The governing board has overall responsibility for monitoring this policy and holding the headteacher to account for its implementation.

The governing board will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The governing board will also make sure aall staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The governing board should ensure children are taught how to keep themselves and others safe, including keeping safe online.

The governing board must ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting those standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing filtering and monitoring provisions at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- Having effective monitoring strategies in place that meet their safeguarding needs.

The governor who oversees online safety is Dushani Parker.

All governors will:

- Ensure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (appendix 3)
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.2 The headteacher

The headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

3.3 The designated safeguarding lead

Details of the school's designated safeguarding lead (DSL) are set out in our child protection and safeguarding policy, as well as relevant job descriptions.

The DSL/Pastoral Leader takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review this policy annually and ensure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks

- Working with the ICT manager to make sure the appropriate systems and processes are in place
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively

This list is not intended to be exhaustive.

3.4 The ICT manager/School Business manager

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on school devices and school networks, which are reviewed and updated at least annually to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on a monthly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

3.5 All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (appendix 3), and ensuring that pupils follow the school's terms on acceptable use (appendices 1 and 2)
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing
- Following the correct procedures if they need to bypass the filtering and monitoring systems for educational purposes
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

3.6 Parents/carers

Parents/carers are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy

- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (appendices 1 and 2)

Parents/carers can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – UK Safer Internet Centre
- Hot topics – Childnet International
- Parent resource sheet – Childnet International

3.7 Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (appendix 3).

4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum:

All schools have to teach:

- Relationships education and health education in primary schools
- Relationships and sex education and health education in secondary schools

Pupils in **Key Stage (KS) 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

By the **end of primary school**, pupils will know:

- That people sometimes behave differently online, including by pretending to be someone they are not
- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online, including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

The safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

5. Educating parents/carers about online safety

The school will raise parents/carers' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents/carers.

Online safety will also be covered during parents' evenings.

The school will let parents/carers know:

- What systems the school uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents/carers have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)

6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Teachers will discuss cyber-bullying with their classes.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents/carers so they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

The headteacher, and any member of staff authorised to do so by the headteacher can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Assess how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the Headteacher or Pastoral leader.
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the DSL/Pastoral Leader to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be

handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on searching, screening and confiscation
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people
- Our behaviour policy / searches and confiscation policy

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

6.4 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

NGJS recognises that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to bully pupils in line with our anti-bullying policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used by the school.

7. Acceptable use of the internet in school

All pupils, parents/carers, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet (appendices 1 to 3). Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

More information is set out in the acceptable use agreements in appendices 1 to 3.

8. Pupils using mobile devices in school

Pupils may bring mobile devices into school, but are not permitted to use them during:

- Lessons
- Tutor group time
- Clubs before or after school, or any other activities organised by the school

Any use of mobile devices in school by pupils must be in line with the acceptable use agreement (see appendices 1 and 2).

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with the school behaviour policy, which may result in the confiscation of their device.

9. Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)

- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way that would violate the school's terms of acceptable use, as set out in appendix 3.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from the School Business Manager or Pastoral Leader.

10. How the school will respond to issues of misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our policies. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents that involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

11. Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
    - Abusive, harassing and misogynistic messages
    - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
    - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL/Pastoral Leader will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.

12. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 5.

This policy will be reviewed every year by the DSL/Pastoral Leader At every review, the policy will be shared with the governing board. The review (such as the one available here) will be supported by an annual risk assessment that considers and reflects the risks pupils face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

13. Links with other policies

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy