Safeguarding Policy 2026 - 2027

Preston Park Primary School

Learning Today, Leading Tomorrow

Our Why

Our children have the right to a world class education
Our children have the right to be safe
Our children have the right to be valued as an individual
Our children have the right to play
Our children have a voice

Our Vision

We are safe, happy and kind at Preston Park
We ignite a love of learning that will last a lifetime We are curious learners confident to take risks We are world changers!

Our Values

Resourceful
Reflective
Responsibility
Resilient
Reciprocity
Respect

Our vision, our values and our rights underpin all our policies; the education we deliver and are core to all our work. Article 3 of the United Nations Convention on the Rights of the Child states that: **The best interests of the child must be a top priority in all decisions that affect children. This policy has been created with this in mind to keep the children at Preston Park safe, happy and with a love for learning.**

Statutory Policy		
Last review	**Reviewed**	**Next Review**
August 2026	Annually	September 2027

Please read this guidance carefully

Who to contact if you have a safeguarding concern:

Role	Name	Contact Details
Head of School - Designated Safeguarding Lead	Siobhan Ali	020 8904 3602
Deputy Headteacher Inclusion - Deputy Safeguarding Lead	Sabrina John-Lewis	020 8904 3602
Safeguarding Officer – Deputy Safeguarding Lead	Courtney Toussaint	020 8904 3602
Executive Headteacher – SLT Safeguarding Team	Georgina Nutton	020 8904 3602
Assistant Headteacher - SLT Safeguarding Team	Anjni Pindoria	020 8904 3602
Acting Assistant Headteacher – SLT Safeguarding Team	Hayley Wright	020 8904 3602
Nominated governor for Safeguarding	Stephanie Ezechuzwu	safeguarding@prestpk.brent.sch.uk
Brent Family Front Door	Children's Social Care referrals	020 8937 4300

Brent professional safeguarding consultation line (urgent concerns/advice) – 020 8937 2228
Emergency Duty Team (urgent out-of-hours professional concerns) – 020 8359 2000
Chair of Governors: Daksha Thanki
Executive Headteacher: Georgina Elizabeth Nutton
Head of School: Siobhan Ali
Deputy Headteacher: Sabrina John-Lewis
Assistant Headteachers: Anjni Pindoria & Hayley Wright

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WHAT TO DO IF YOU HAVE A CONCERN ABOUT A CHILD

Safeguarding is everyone's responsibility

1 NOTICE A CONCERN

You may have a concern because a child:

- Tells you something
- Shows signs or indicators of abuse or neglect
- Discloses information indirectly
- Is involved in a situation that causes you concern

Trust your instincts – it is better to act than ignore a concern.

2 TAKE IMMEDIATE ACTION

- Listen to the child and stay calm.
- Reassure the child but do not promise confidentiality.
- Do not ask leading questions. Use open prompts: *Tell, Explain, Describe* (TED).
- Take what the child says seriously.
- Make a brief written record as soon as possible using the child's exact words.
- Sign, date and time your record and **keep it factual.**
- Do not discuss the concern with **anyone** other than the DSL.

3 SHARE THE CONCERN WITHOUT DELAY

Report your concern to the Designated Safeguarding Lead (DSL) or, if unavailable, a Deputy DSL.

Same day – do not wait.

4 DSL ASSESSMENT

The DSL will:

- Review the information and any existing history.
- Consider the level of need or risk.
- Decide the most appropriate next steps.
- Record actions on CPOMS.

5 IMMEDIATE DANGER?

If the child is at immediate risk of harm or in danger:

- Call 999
- Inform the DSL as soon as possible
- Follow up with a record on CPOMS

EARLY HELP

No immediate risk of significant harm.

DSL may:

- Offer early help
- Refer to school support services
- Liaise with parents (unless this would put the child at increased risk)

MONITORING

Further information or assessment required.

DSL will:

- Monitor the situation
- Gather more information
- Review and decide next steps

REFERRAL

If the child is suffering or likely to suffer significant harm.

DSL will make a referral to Brent Children's Social Care (Family Front Door).

6 RESPONSE & ACTION

The DSL will:

- Decide and take action
- Make referrals where appropriate
- Liaise with Brent Children's Social Care and other agencies
- Keep detailed records on CPOMS
- Keep staff informed on a need-to-know basis

7 ONGOING SUPPORT & REVIEW

The DSL will ensure:

- The child receives appropriate support
- The situation is monitored and reviewed
- Records are kept up to date
- The child's voice is heard and their best interests remain at the centre of all decisions

If you are ever unsure, speak to the DSL. It is always better to share a concern.
Our priority is to keep children safe, happy and able to learn.

IMPORTANT CONTACTS

Designated Safeguarding Lead (DSL):
Siobhan Ali – Head of School

Deputy Safeguarding Leads (DDSLs):
Georgina Nutton – Executive Headteacher

Sabrina John-Lewis – Deputy Headteacher Inclusion

Anjni Pindoria – Assistant Headteacher

Hayley Wright – Acting Assistant Headteacher

Courtney Toussaint – Safeguarding Officer and Deputy Safeguarding Lead

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Brent Family Front Door (Children's Social Care)
020 8937 4300

Brent Emergency Duty Team (out of hours)
020 8359 2000

Brent Safeguarding Consultation Line (advice)
020 8937 2228

Police (if a child is in immediate danger)
999

REMEMBER

- **Safeguarding is everyone's responsibility.**
- **Listen, believe, reassure.**
- **Record accurately and promptly.**
- **Share without delay.**
- **The child's safety and well-being comes first.**

Introduction

We are **safe,** happy and kind at Preston Park.

Preston Park Primary School is a community and safeguarding children is **everyone's** responsibility.

We all have an essential role to play in making Preston Park safe and secure. Everyone who comes into contact with children and families has a role to play in safeguarding children.

Preston Park recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The safety and well-being of the children is our highest priority in all aspects of the school's work.

The governing body ensures Preston Park will safeguard and promote the welfare of pupils and work together with other agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

The school aims to ensure that:

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

Principles

Our schools' core safeguarding principles are:

- It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All children have a right to be heard and to have their wishes and feelings taken into account
- All staff understand safe professional practice and adhere to our code of conduct and other associated links
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance

Key elements to our safeguarding policy

There are four key elements to our safeguarding policy:

Prevention (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);

Protection (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);

Support (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);

Working with parents and other agencies (to ensure appropriate communications and actions are undertaken).

The legal framework

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education and Working Together to Safeguard Children, and the Governance Handbook. We comply with this guidance and the locally agreed multi-agency safeguarding arrangements established by the **Brent Safeguarding Children Partnership (BSCP)** and the **London Safeguarding Children Procedures**.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) Regulations 2018 and the Childcare Act 2006, which set out who is disqualified from working with children.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head of School should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern

and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

London Safeguarding Children Procedures – Brent Safeguarding Children Partnership (BSCP)

Equality statement

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

We give special consideration to children who:

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

Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 2 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

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

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

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

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

Roles and Responsibilities

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

- What constitutes sexual harassment and sexual violence and why they're always unacceptable

All staff will:

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

All staff will be aware of:

- Our systems which support safeguarding, including the staff Code of Conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education
- The school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (LGBTQ) can be targeted by other children
- What to look for to identify children who need help or protection

The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Siobhan Ali, Head of School. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of school hours the DSL can be contacted via email: safeguarding@prestpk.brent.sch.uk

When the DSL is unavailable, the **Deputy Designated Safeguarding Leads: Sabrina John-Lewis and Courtney Toussaint** will be on duty.

If the DSL and Deputy DSLs are not available or are absent, we have cover arrangements in place. This includes:

The Safeguarding Team, Georgina Nutton, Executive Headteacher, Anjni Pindoria, Assistant Headteacher and Hayley Wright, Assistant Headteacher. A shared mailbox email: safeguarding@prestpk.brent.sch.uk

At Preston Park Primary School, we have a team of Designated Safeguarding Leads (DSL) and all members of the Senior Management Team are trained to deputise in the absence of a DSL to ensure there is appropriate cover for this role at all times. The DSL's responsibilities are described in Appendix 1, and the DSL has a specific safeguarding job description.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour. The DSL will also:
- Keep the Executive Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and deputies are set out in their job description.

The Deputy DSLs will also keep the Head of School informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head of School to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This will always be a different person from the DSL.
- Make sure the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 5 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place

- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
    - The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the executive headteacher, where appropriate.
    - All governors will read Keeping Children Safe in Education in its entirety.
    - The governing board will approve this policy at each review, and hold the Head of School and Executive Headteacher to account for its implementation.

The Head of School

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

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Ensure that online safety training is included in staff safeguarding and child protection training
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

At Preston Park **all teachers** are responsible for promoting the educational achievement of children who are looked after and our **designated lead** works with the Virtual School Head to discuss how available funding can be best used to support the progress of looked after children and meet the needs identified in the child's personal education plan.

Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

Safeguarding Training

All staff members will receive annual safeguarding and child protection training (organised by the DSL) which will enable them to:

- **Recognise** potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with the school policies
- **Refer** concerns to the DSL and be able to seek support external to the school if required

There will also be additional training in specific areas throughout the year e.g. annual PREVENT training, online safety, safer handling, safer recruitment for SLT.

Supporting Children

At Preston Park we will support all pupils by:

- recognising that Preston Park may be the only stable, secure and predictable element in some of our children's lives.

- ensuring the content of the curriculum is relevant and includes social and emotional aspects of learning and the promotion of British Values;

- ensuring a comprehensive curriculum response to online-safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly;

- ensuring that child protection is included in the curriculum to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to;

- providing pupils with a number of appropriate adults to approach if they are in difficulties;

- supporting the child's development in ways that will foster security, resilience, confidence and independence;

- encouraging development of self-esteem and self-assertiveness;

- ensuring any hate incidents, e.g. racist, homophobic or gender- or disability-based bullying, are considered under child protection procedures;

- liaising and working together with other support services and those agencies involved in safeguarding children;

- monitoring children who have been identified as having welfare or protection concerns and providing appropriate support.

- ensuring that all staff are aware of the early help process, and understand their role in it, including acting as the lead professional where appropriate.

- ensuring that all staff understand the additional safeguarding issues of children with special educational needs and disabilities and how to address them

- monitoring attendance patterns and reviewing and responding to them as part of welfare and protection procedures.

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks

- The provision of pastoral and/or academic support

Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Siobhan Ali, Head of School, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked after children and meet the needs identified in their personal education plans

Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

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

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

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

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Recognising abuse and taking action

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

All staff should:

- Reassure victims that they are being taken seriously and that they will be supported and kept safe. They shouldn't be given the impression they are creating a problem or made to feel ashamed for making a report
- Know the indicators of abuse and neglect for specific safeguarding issues such as child criminal exploitation and child sexual exploitation
- Be vigilant as multiple safeguarding issues will overlap with one another
- Be aware of the risk factors that increase the likelihood of involvement in serious violence

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

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

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

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

If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly. Referrals should be made via **Brent Children's Social Care's current professional referral route.**

What to do if a child makes a disclosure to you

Our role at Preston Park is that of approachable adults and not as investigators. We observe, note and date any concerns and report to the Designated Safeguarding Lead.

If you are in a situation where a child discloses to you:

- **Listen carefully to the child and believe them**. Allow them time to talk freely and do not ask leading questions. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking. Allow the child to talk freely.
- If clarification is necessary, use only open prompts such as the **TED** technique: **T**ell, **E**xplain, **D**escribe.
- Do not ask leading, suggestive or investigative questions.
- **Let them know they've done the right thing.** Reassurance can make a big impact on the child who may have been keeping the abuse secret.
- **Tell them it's not their fault.** Abuse is never the child's fault and they need to know this.
- **Say you believe them.** A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them.
- **Explain what you'll do next. Never promise to keep it a secret.** If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help.
- **Inform a DSL that there has been a disclosure**
- **Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Refer to your** up-to-date training and find a member of the safeguarding team who can help you through the reporting stage. **Upload to CPOMS** and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so
- **Seek support if you feel distressed.**

Bear in mind that some children may:

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

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Reporting on CPOMS

All disclosures must be reported to a member of the Designated Safeguarding Team immediately and recorded appropriately.

At Preston Park we use CPOMS; a child protection online management system to record our safeguarding concerns. When you log your concern on CPOMS, **do not change** the date and time. You can record the date and time of the disclosure within your report.

Your CPOMS report must include:

- The name of the pupil
- Any other linked students
- When and where the disclosure/ incident/ concern took place
- What the child said (using the child's words)
- What you said to the child
- The names of any other staff or pupils who witnessed the incident/ disclosure/ concern;
- Any action you have taken

FGM

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

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

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

Any teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

Any member of staff who suspects that a pupil is at risk of FGM must speak to the DSL immediately and follow the school's safeguarding and Brent referral procedures. Where there is an immediate risk of harm, the police should be contacted without delay.

If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly.

You can also contact the charity **NSPCC on 0808 800 5000** if you need advice on the appropriate action.

Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

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

A child may also benefit from early help – if they have: health conditions, a mental health need, a family member in prison or affected by parental offending, a risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the day).

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

The school will have regard to the current Brent Thresholds Guidance and London Thresholds Guidance when determining the appropriate level of help, support, safeguarding intervention or referral.

Where professional disagreement cannot be resolved through normal professional discussion and the school's internal escalation arrangements, the school will follow the Brent Safeguarding Children Partnership Escalation Policy.

Brent safeguarding and referral arrangements

The school follows the current Brent Safeguarding Children Partnership procedures and Brent Thresholds Guidance.

Where there is an immediate risk of serious harm, staff should contact the police on 999 and/or Children's Social Care without delay.

Professionals requiring urgent safeguarding advice or guidance about a referral during office hours can contact Brent's dedicated professional safeguarding consultation line on 020 8937 2228.

For urgent professional safeguarding concerns outside office hours, Brent's Emergency Duty Team can be contacted on 020 8359 2000.

Non-urgent referrals and requests for Early Help/Family Help should be made through Brent's current professional referral arrangements and Family Front Door. Where appropriate, parents/carers should normally be informed and consent sought before an Early Help or non-urgent referral. Consent should not be sought where doing so may increase the risk to the child, jeopardise an investigation or cause a delay which could adversely affect the child's safety.

Where there is uncertainty about the appropriate level of intervention, the DSL will have regard to the current Brent Thresholds Guidance and London Thresholds Guidance and seek professional safeguarding advice where necessary.

Extremism

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

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

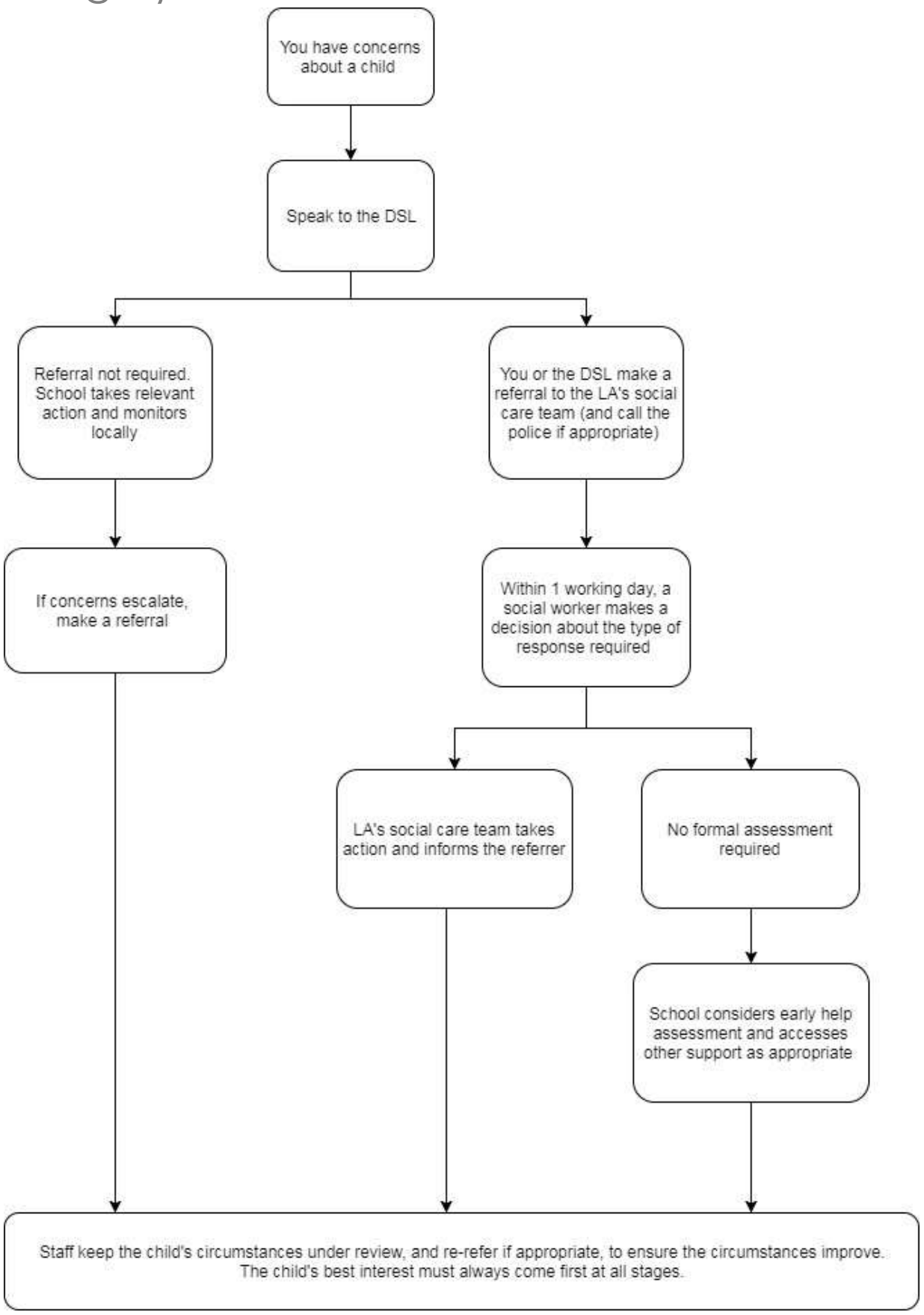
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority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

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

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

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

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



Concerns about a staff member or volunteer

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

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

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

Where appropriate, the school will inform the LADO [Local Authority Designated Officer] of the allegation and actions taken, within the necessary timescale.

Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up", or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.
For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our school reporting systems.
- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent. The DSL will, along with any relevant agencies (this will be decided on a case by case basis):

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

them out of classes with the victim, and the reason(s) behind any decision(s)

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

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images or videos from devices or online services

- Any relevant facts about the pupils involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual

- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 6 for more information on assessing adult-involved incidents.

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the school's Safer Schools Officer, where appropriate, or by dialling 101.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.
- Teaching follows best practice in delivering safe and effective education, including:

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

Mobile phones and cameras

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, 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, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by Georgina Nutton with the support of our DSL and IT support
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Confidentiality and sharing information

Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

- Timely information sharing is essential to effective safeguarding
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests

Staff should only discuss concerns with the DSL, Head of School, Executive Headteacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Child protection information will be stored and handled in accordance with the Data Protection Act 2018 and UK GDPR

Safeguarding forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a flash drive, these items should also be kept in locked storage.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they should refer the request to the Head of School.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.
The school's policy on confidentiality and information-sharing is available to parents and pupils on request.

Training

All staff

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

This training will be regularly updated and will:

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

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

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

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

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The DSL and Deputies
The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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

Recruitment – interview/appointment panels
At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

Domestic Abuse

The cross-government 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.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (e.g. increased status) of the perpetrator or facilitator

It can be perpetrated by individuals or groups, males or females, and children or adults.

It can be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and can involve violence or threats of violence.

Victims can be exploited even when activity appears to be consensual.

It can happen online as well as in person.

Some specific forms of CCE can include:

- children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing.
- They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

- Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt.
- They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and

professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

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

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late ▪ Children who regularly miss school

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.

Due to the nature of the grooming methods used by their abusers, it is very common for children and young people who are sexually exploited not to recognise that they are being abused.

Children Absent from Education

A child who is absent from education is a potential sign of abuse or neglect, particularly on repeat occasions.

Schools should put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect and to help prevent the risks of their going missing again.

Schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous

period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Refer to Keeping Children Safe in Education September 2026 for further guidance.

County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism103 should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

In responding to concerns about county lines or criminal exploitation, the DSL will follow the current Brent Thresholds Guidance and safeguarding referral arrangements and consider appropriate specialist local or pan-London exploitation support alongside Children's Social Care and/or police involvement.

Online-Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, 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, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

- Contact – being subjected to harmful online interaction with other users, 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

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy which can be found on our website.

Preston Park has an Online-Safety policy which includes guidance for all pupils in relation to Online-Safety and using the internet and social media. There are appropriate filtering and monitoring systems in place. In some extreme cases the Police may become involved if a child is at risk of exploitation due to their use of the internet or social media. Consequently, staff must report concerns in a timely way so that advice and support can be sought.

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 Gemini.

Preston Park recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Preston Park will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy and artificial intelligence policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Education at home

Where children are being asked to learn online at home, the Department for Education provides guidance to support schools and colleges to do so safely- safeguarding and-remote-education.

For further information, see Keeping Children Safe in Education and our online safety policy.

Sexting

Sexting among children and young people can be a common occurrence, where they often describe these incidents as 'mundane'. Children involved in sexting incidents will be dealt with by the police as victims as opposed to perpetrators, unless there are mitigating circumstances. **The DSL should record all incidents of sexting.** Please report any incidences of sexting, even if you are not sure.

Your responsibilities when responding to an incident:

- If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the

incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through a safer school's officer or by dialling 101.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded on CPOMS.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our relationships education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images ▪ The receipt of such images

This policy on sexting is also shared with pupils, as appropriate, so they are aware of the processes the school will follow in the event of an incident.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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

When supporting victims, staff will:

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

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ children are at greater risk.

All staff need to maintain an attitude of "it could happen here".

Addressing inappropriate behaviour can help prevent abusive/violent behaviour.

Victims of this abuse will likely find the experience distressing, which can affect their progress in school, this can be made worse if the alleged perpetrator(s) attends the same school.

Staff should be aware that girls are more likely to be victims and boys are more likely to be the perpetrators.

It could be done by a group, not just an individual.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When

referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

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

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

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

- sexual "jokes" or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs, including computer generated imagery, of U18s is a criminal offence;

- sharing of unwanted explicit content;

- upskirting (is a criminal offence);

- sexualised online bullying;

- unwanted sexual comments and messages, including, on social media;

- sexual exploitation; coercion and threats.

Pupils with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- Daily nurture group
- Place2Be Support
- A safe space to talk with a trusted adult
- ELSA trained members of staff
- Learning mentor support

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Young Carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying.

Any concerns should be reported to the DSL.

Pupils who are questioning their gender

Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that

may have significant effects on the child in terms of their psychological functioning and longer-term outcomes

- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions.

Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

Child on child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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

At Preston Park we recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of child on child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)

Children can abuse their peers online through:

- Abusive, harassing, and misogynistic messages
- Non-consensual sharing of nude or 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

All staff should recognise the indicators of child on child abuse, know how to identify it and respond to reports.

All staff should recognise that child on child abuse may be taking place, even if not reported.

All staff must understand their role in preventing it and responding to it if they believe a child may be at risk.

All staff should understand the importance of challenging inappropriate behaviours between peers. If they don't, it can create an unsafe environment and lead to a culture that normalises abuse.

Abuse can take place inside and outside of school or online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

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

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

- Is serious, and potentially a criminal offence

- Could put pupils in the school at risk

- Is violent

- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

The following applies to all staff:

- You do not need to wait for a child to make a disclosure, you should act on any concerns immediately.

- You may overhear a conversation that suggest a child may have been harmed or a child's behaviour may be an indicator.

- You may confiscate devices for evidence to hand to the police, if the report includes an online element.

- You can ask children outright if they've been harmed and what the nature of the harm was.

- You should keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.

- You should reflect back, using the child's language, when hearing a report.

- You should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse.

The DSL & safeguarding team will:

- Be aware of, and respond appropriately to all reports and concerns about sexual violence and/or harassment both online and offline, including those that have happened outside of school

- Balance the victim's wishes against your responsibility to protect other children

- Remember that sexual violence and sexual harassment can take place within intimate personal relationships between peers

- Think about other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation, and take the potential for sexual violence and harassment in intimate personal relationships into consideration

- Keep victim and alleged perpetrator(s) a reasonable distance apart on school premises includes at before and after-school activities

- Regularly review the actions you take to respond to reports. In response, update relevant policies with lessons learnt and consider whether there are wider cultural issues at play

- Record all concerns, discussions and decisions made, and the reasons for those decisions, in writing

- Preston Park's response will be underpinned by the principle that "there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated"

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

- Report this to the DSL immediately and record the allegation on CPOMS, but do not investigate it.

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

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

- The DSL's risk and needs assessment in response to a report of sexual harassment WILL also consider whether there have been any other victims

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

- The DSL will offer all children Place2Be sessions.

We will minimise the risk of child on child abuse by:

- Provide a developmentally appropriate PSHE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.

- Have systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued.

- Have relevant policies in place (e.g. behaviour policy).

- Offer a space for children to talk and therapeutic services e.g. Place2Be, Place2talk

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensuring pupils know they can talk to staff confidentially by highlighting this in assemblies, posters around the school, circle times in class and PSHE lessons.

- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- Child on child abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender-based violence/ sexual assaults, sexting, teenage relationship abuse, child on child exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

Should an incident occur, it is essential that all such incidents are treated seriously. The needs of the victim must be addressed, in addition to ensuring that the perpetrator is dealt with in such a way that they acknowledge the seriousness of their action.

Social Services will be informed of all incidents. Parents or carers of both young people will be contacted to give them an opportunity to support their child. It must be remembered that a criminal offence may have been committed and the victim has the right to pursue a complaint against someone who has assaulted them.

Upskirting is now a form of child on child abuse

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

Mental Health

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

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. FGM is against the law except when performed by a registered medical profession on medical or mental health grounds. It is also illegal for someone to arrange for a child to go abroad with the intention of having her circumcised.

Signs of FGM can include:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Fracture or dislocation of legs/arms as a result of restraint
- Spend long periods of time away from a classroom during the day with bladder or menstrual problems
- Severe pain in groin area
- Haemorrhage
- Being withdrawn - emotional and psychological shock (exacerbated by having to reconcile being subjected to the trauma by loving parents, extended family and friends); Detached / isolated; extremes of emotion
- Urinary infections
- Change in physical appearance/dress & body language
- Withdrawn aggressive
- Unable to form relationships with adults
- Changes in attitude, personality or behaviour
- Changes in interaction with others
- Feelings shown through writing or art work
- Peer group problems

Any suspicions of a child at risk of having or having had FGM must be reported immediately to the Head of School or DSL. Girls aged 5 to 8 years are most risk.

Any suspicion of FGM having taken place must be reported to the police on 101. If FGM is suspected to be happening now, or to prevent it from happening call 999.

Serious Violent Crime

A serious violent crime is a crime of violence in which an offender or perpetrator uses or threatens to use force upon a victim. This entails both crimes in which the violent act is the objective, such as murder or rape, as well as crimes in which violence is the means to an end.

All staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. These include:

- Unexplained gifts or new possessions - these can indicate that children have been approached by or involved with individuals associated with criminal networks or gangs
- Increased absence from school
- Change in friendship or relationships with others or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance 11.

So-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.
All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. 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

Forced Marriage

A forced marriage is one in which at least one participant does not (or cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a serious abuse of human rights. Whilst it is unlikely that primary-age pupils will be the victims of forced marriage, at Preston Park we are aware that children may disclose that older siblings or parents are at risk.

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

Preventing Radicalisation

In 2007 the British government launched its first counter terrorism strategy CONTEST. The CONTEST strategy seeks to counter the threat from terrorism and has four key strands of work,

- **Pursue** - To stop terrorist attacks
- **Prevent** - To stop people becoming terrorists or supporting terror
- **Protect** - To strengthen our protection against a terrorist attack
- **Prepare** - To mitigate the impact of a terrorist attack

In July 2015, the government introduced the Counter Terrorism and Security Act (CTSA) Section 26 of the CTSA places a duty on certain bodies ("specified

authorities" listed in schedule 6 of the Act), in the exercise of their functions, to have "*due regard* to the need to prevent people from becoming involved with or supporting terrorism."

This guidance is issued under section 29 of the Act;

The Act states that the authorities subject to the provisions must have regard to this guidance when carry out the duty. As a specified authority Preston Park Primary School will discharge its responsibility in accordance with the Prevent duty and Ofsted descriptors via this safeguarding policy, prevent delivery plan, and risk assessment, which should be read in conjunction with this policy

We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. Staff are expected to uphold and promote the fundamental
principles of British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Our approach will build on the guidance issued by DFE for schools to make explicit our preventative measures to minimise the threat of extremism in our school.

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

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

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

At Preston Park, we have our own internal process in place to effectively respond to all safeguarding issues, including those related to extremism.

We will always adopt an appropriate and proportional response to such issues where DSLs will discuss concerns with the local authority and Prevent police leads to discuss if a referral to the local channel panel is appropriate, and to agree any other actions required to better understand the presenting issues, risks and vulnerabilities to the pupils of concern. Staff must ensure they follow our internal process in the first instance in all cases.

Staff must be fully engaged in being vigilant about radicalisation; that they overcome any disbelief that such issues will not happen at Preston Park and ensure that they work alongside other professional bodies and agencies to

ensure that pupils and staff are safe from harm. The principle objectives are that:

- Pupils are encouraged to adopt and live out the school's core values of Respect.
- These complement the key "British Values" of tolerance, respect, understanding, compassion and harmonious living.
- Pupils are helped to understand the importance of democracy and freedom of speech, through SMSC, assemblies and through the elected School Council members.
- Pupils are taught how to keep themselves safe, in school and when using the internet.
- Pupils participate in local community events so that they appreciate and value their neighbours and friends who may not share their faith background.
- Pupil's wellbeing, confidence and resilience is promoted through our planned curriculum and out of hours learning opportunities.
- Pupils are supported in making good choices from a very young age, so they understand the impact and consequences of their actions on others.
- Governors, teachers, teaching assistants and non-teaching staff demonstrate an understanding of what radicalisation and extremism are and why we need to be vigilant in school.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to becoming involved with or supporting terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to becoming involved with or supporting terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Private Fostering

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

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

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

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

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

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

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

Record-keeping

We will hold records in line with our records retention schedule.
All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

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

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

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

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

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

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

The Use of Force to Restrain Pupils

Staff are authorised by the Head of School and Executive Headteacher to use force, as is reasonable, in circumstances which prevents a pupil from doing, or continuing to do, any of the following:

- committing a criminal offence (including behaving in a way that would be an offence if the pupil were not under the age of criminal responsibility);
- injuring themselves or others;
- causing damage to property (including the pupil's own property);
- engaging in any behaviour prejudicial to maintaining good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom during a teaching session or elsewhere.

There is no legal definition of 'reasonable force' and **in all cases must proportionate and necessary**. The use of force should be a last resort

The use of force can be regarded as reasonable only if the circumstances of the particular incident warrant it. The degree of force employed must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent. Any force used should always be the minimum needed to achieve the desired result.

Before intervening physically an adult should, wherever practicable, tell the pupil who is misbehaving to stop and what will happen if he or she does not. The adult should continue attempting to communicate with the pupil throughout the

incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

Staff should always avoid touching or holding a pupil in a way that might be considered indecent.

Staff should always try to deal with a situation through other strategies before using force.
The possible consequences of intervening physically, including the risk of increasing the disruption or actually provoking an attack, need to be carefully evaluated.

Whistle blowing and complaints

All staff at Preston Park are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they will speak with the Head of School, the chair of the governing board or with the Local Authority Designated Officer.

Should staff not feel able to raise concerns they can call the NSPCC whistleblowing helpline on 0800 028 028

Site Security

All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

We check the identity of all visitors and volunteers coming into Preston Park. Visitors are expected to sign in and out at the front office and to display a visitor's badge while on the Preston Park site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

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

The morning procedures at school are that no adults enter the playground. Any access to the school must be made via the front office. In the afternoon, parents are able to enter the playground and speak to class teachers. However, no parents should enter the building.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge. Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Safer recruitment

Preston Park has robust recruitment and vetting procedures to help prevent unsuitable people from working with children.

Our job advertisements and application packs make explicit reference to Preston Park's commitment to safeguarding children, including compliance with the Disclosure and Barring Service (DBS) process and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education 2026.*

At least one member on every short listing and interview panel will have completed safer recruitment training. The Head of School is responsible for ensuring that safer recruitment training is kept up to date.

Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.

The Head of School and the nominated governor for child protection are responsible for ensuring that our **single central record** is accurate and up to date.

Appendix 1: The role of the Designated Safeguarding Lead

1 MANAGING REFERRALS

1.1 Refer cases of suspected abuse to Brent Children's Social Care in accordance with current Brent Safeguarding Children Partnership procedures and Brent Thresholds Guidance, and to the police where a crime may have been committed or there is an immediate risk requiring police intervention.

1.2 Liaise with the Head of School and safeguarding team about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.

1.3 Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.

1.4 Liaise with agencies providing early help services and coordinate referrals from Preston Park to targeted early help services for children in need of support. Monitor any cases referred to early help and consider referral to children's services where the situation does not improve.

1.5 Should help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including those with a social worker) are experiencing, or have experienced, with teachers and other staff.

1.6 This could be done by, for example:

Making sure that staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for them.

1.7 Supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments that they could make to best support them.

1.8 Refer cases to the Channel programme where there is a radicalisation concern as required.

2 RECORD KEEPING/ CPOMS

2.1 Keep written records of child protection in line with Brent Safeguarding Children Partnership (BSCP) and school policy.

2.2 Ensure a stand-alone file is created as necessary for children with safeguarding concerns.

2.3 Maintain a chronology of significant incidents for each child with safeguarding concerns.

2.4 Ensure such records are kept confidentially and securely and separate from the child's educational record.

2.5 When a child leaves Preston Park, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an appropriately agreed manner.

3 INTER-AGENCY WORKING AND INFORMATION SHARING

3.1 Cooperate with Children's Social Care for enquiries under section 47 of The Children Act 1989.

3.2 Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multiagency meetings, as required.

3.3 Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.

4 TRAINING

4.1 Undertake appropriate training, **updated every year**, and update knowledge and skills.

4.2 Ensure each member of staff has access to and understands Preston Park's safeguarding policy and procedures, including providing induction on these matters to new staff members.

4.3 Organise whole-school child protection training for all staff members regularly, and provide updates at least annually. Ensure staff members who miss the training receive it by other means.

4.4 Ensure Preston Park allocates time and resources every year for relevant staff members to attend training.

4.5 Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.

4.6 Maintain accurate records of staff induction and training.

5 AWARENESS RAISING

5.1 Review the safeguarding and child protection policy and procedures annually and liaise with Preston Park's governing body to update and implement them.

5.2 Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the school in any investigations that ensue

5.3 Provide updates to the staff on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.

6 QUALITY ASSURANCE

6.1 Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum once a year).

6.2 Provide regular reports, to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.

6.3 Take lead responsibility for remedying any deficiencies and weaknesses identified in child protection arrangements.

a. PROCEDURE FOR MANAGING ALLEGATIONS OF ABUSE MADE AGAINST PRESTON PARK STAFF MEMBERS, SUPPLY STAFF AND VOLUNTEERS

b. Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at Preston Park. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

c. In some cases, you may have to consider an allegation against someone not directly employed by you, where your usual disciplinary procedures don't fully apply, like supply staff provided by an agency.

d. You should make sure allegations are dealt with properly, and you shouldn't decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with your LADO to determine a suitable outcome.

e. Governing boards should discuss with the agency whether it's appropriate to suspend the supply teacher, or redeploy them to another part of the school, while they carry out their investigation.

f. Agencies should be fully involved and co-operate in any enquiries, but your school will usually take the lead as the agency won't be able to collect the necessary information.

g. The allegations management meeting should address issues such as information sharing, to ensure previous concerns or allegations known to the agency are taken into account.

h. When using an agency, you should inform them of your process for managing allegations, including inviting the agency's HR manager or equivalent to meetings and keeping them up to date with information about your policies.

i. Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

j. We will take all possible steps to safeguard our children and to ensure that the adults at Preston Park are safe to work with children. We will always ensure that the procedures outlined in Part 4 of Keeping Children Safe in Education 2026 are adhered to.

k. If an allegation is made or information is received about an adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Head of School immediately. Should an allegation be made against the Head of School, this will be reported to the Executive Headteacher. In the event that neither the Executive Headteacher nor Chair of Governors are not contactable on that day, the information must be passed to and dealt with by the Deputy Headteachers or the Vice Chair of Governors.

l. Preston Park has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at Preston Park, a

referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education, September 2026.

Appendix 2: Specific forms of abuse and safeguarding issues

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of

exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

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.

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

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

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

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

Child abduction and community safety incidents

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. When alerted to such incidents in the vicinity, Preston Park will make families of Preston Park aware.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Preston Park provide outdoor-safety lessons run by teachers or by local police staff.

Staff must report any concern about an attempted or suspected child abduction, suspicious approach or other community safety incident to the DSL immediately. Where there is an immediate risk to a child, the police will be contacted without delay. The school will work with the police, Brent Children's Services and other relevant agencies as appropriate and will consider whether wider communication with parents/carers is necessary to safeguard the school community.

Children and the court system

Children may sometimes be required to give evidence in criminal courts or become involved in family court proceedings. Involvement in court proceedings can be stressful and distressing for children.

Staff should be alert to changes in a child's behaviour, attendance, emotional wellbeing or engagement with education which may indicate that additional support is required.

Any safeguarding concerns must be reported to the DSL. The DSL will consider appropriate pastoral support and, where relevant, work with parents/carers and external professionals to ensure that the child's welfare and educational needs are supported.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Staff should be sensitive to the impact that the imprisonment or offending of a parent, carer or family member may have on a child, including stigma, isolation, financial hardship, changes in caring arrangements and emotional distress. Concerns should be reported to the DSL. The school will consider appropriate pastoral support and whether Early Help/Family Help or support from another service would benefit the child and family.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual

exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Any concern that a child may be a victim of trafficking, modern slavery, forced criminality or other exploitation must be reported immediately to the DSL. The DSL will consider referral to Brent Children's Social Care and/or the police and whether a referral through the National Referral Mechanism (NRM) is required. Children may not recognise themselves as victims and apparent compliance with criminal or exploitative activity must not prevent staff from considering the child as a potential victim of abuse and exploitation.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,130

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general online safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Where a pupil is identified as being involved in, or at risk of becoming involved in, cyber-dependent crime, staff must report the concern to the DSL. The DSL will consider the child's safeguarding needs and whether specialist support, including the national Cyber Choices programme, is appropriate. Apparent technical ability or curiosity should not prevent staff from considering whether a child is being exploited, coerced or drawn into offending.

Domestic abuse

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

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. Under Operation Encompass, police share information with schools following domestic abuse incidents involving children, enabling appropriate support to be put in place.

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

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling

behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places legal duties on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Appendix 3: safer recruitment and DBS checks – Policy and Procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

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

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

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

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

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

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

  The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

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

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Head of School as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in

individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check:
  - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
  - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification

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

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

The above applies to both paid staff and volunteers.

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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

We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside

of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

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

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

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

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be

engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

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

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence

- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

We will obtain a copy of the enhanced Disclosure and Barring Service (DBS) check from the agency where it disclosed any "matter or information" or "any information was provided to the employment business".

The agency or third party must obtain the enhanced DBS certificate with barred list information (where this is required) for agency and third party staff, prior to appointing the individual.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- Check ID and be assured that the visitor has had the appropriate DBS check, for visitors attending in a professional capacity

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
  Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

- All governors will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity.

Appendix 4: Specific Safeguarding Issues

This appendix should be read alongside *Keeping Children Safe in Education 2026* (KCSIE), *Working Together to Safeguard Children*, the London Safeguarding Children Procedures and the locally agreed procedures of the Brent Safeguarding Children Partnership (BSCP).

Safeguarding issues rarely occur in isolation and children may be affected by several risks or vulnerabilities at the same time. Staff should maintain an attitude of **"it could happen here"** and report any safeguarding concern to the Designated Safeguarding Lead (DSL) or a deputy.

Preston Park Primary School follows the current **Brent Thresholds Guidance** and **London Thresholds Guidance** when considering the level of need, risk and appropriate response. Where appropriate, the school will work with Brent Children's Social Care, the Metropolitan Police, health services and other relevant agencies.

Where a child is in immediate danger or there is an immediate risk of serious harm, the police should be contacted on **999** and/or Children's Social Care without delay.

Professionals requiring urgent safeguarding advice or guidance about a referral during office hours may contact Brent's professional safeguarding consultation line on **020 8937 2228**. For urgent professional safeguarding concerns outside office hours, Brent's Emergency Duty Team can be contacted on **020 8359 2000**.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, people known but not related to the child, or strangers.

Other community safety incidents in the vicinity of the school may also raise safeguarding concerns, for example:

- unknown adults approaching or attempting to engage children in conversation
- suspicious vehicles or individuals near the school
- people loitering close to the school site
- reports of violence, weapons, gang activity or exploitation within the local community
- attempted or suspected abduction
- incidents which may present an immediate or emerging risk to pupils travelling to or from school.

Staff must report any concern about an attempted or suspected child abduction, suspicious approach or other community safety incident to the DSL immediately.

Where there is an immediate risk to a child, the police will be contacted without delay.

The school will work with the police, Brent Children's Services and other relevant agencies as appropriate and will consider whether wider communication with parents/carers is necessary to safeguard the school community.

When alerted to relevant community safety incidents, Preston Park may provide appropriate information to families while ensuring that confidential safeguarding information is not disclosed.

As children develop greater independence, including travelling to and from school independently, the school will provide age-appropriate opportunities within the curriculum and wider safeguarding education to help children understand how to keep themselves safe.

Children and the court system

Children may sometimes be required to give evidence in criminal courts or become involved in family court proceedings.

Involvement in court proceedings can be stressful and distressing for children and may affect their emotional wellbeing, attendance, behaviour, concentration and engagement with education.

Staff should be alert to changes in a child's behaviour, attendance, emotional wellbeing or engagement with education which may indicate that additional support is required.

Any safeguarding concerns must be reported to the DSL.

The DSL will consider appropriate pastoral and educational support and, where relevant and appropriate, work with parents/carers and external professionals to ensure that the child's welfare and educational needs are supported.

Staff should maintain appropriate confidentiality and should not question a child about court proceedings beyond what is necessary to understand and respond to a safeguarding or welfare concern.

Children with family members in prison or affected by parental offending

Children who have a parent, carer or close family member in prison, custody or otherwise involved in offending may experience a range of difficulties.

These can include:

- stigma or embarrassment
- isolation
- poverty or financial hardship
- changes in caring arrangements
- disruption to family relationships
- emotional distress
- difficulties with attendance or engagement in school
- anxiety about the wellbeing of the family member
- increased vulnerability to poor mental health or other adverse outcomes.

Staff should be sensitive to the impact that imprisonment or offending within a family may have on a child and should avoid making assumptions about the child or family.

Concerns should be reported to the DSL.

The school will consider appropriate pastoral support and whether Early Help/Family Help or support from another service would benefit the child and family.

Where safeguarding concerns arise, the DSL will consider the appropriate response in accordance with the current Brent Thresholds Guidance and local safeguarding procedures.

Child Criminal Exploitation and County Lines

Child Criminal Exploitation (CCE) is a form of abuse.

Children may be manipulated, coerced, controlled or deceived into taking part in criminal activity. Exploitation may occur even where the activity appears consensual, and children may not recognise themselves as victims.

County lines is one form of criminal exploitation. It commonly involves gangs and organised criminal networks using children and vulnerable people to transport, store or sell drugs and money between locations.

Children may be recruited through:

- grooming
- intimidation
- violence or threats of violence
- sexual violence
- debt bondage
- gifts or money
- friendship or relationships
- status or a sense of belonging
- threats towards family members.

Possible indicators may include:

- unexplained money, clothing, phones or other possessions
- relationships with older individuals or groups
- unexplained changes in friendships
- frequent or unexplained absence from school
- going missing from home or care
- unexplained travel to other areas
- deterioration in attendance, behaviour or attainment
- unexplained injuries
- carrying weapons
- excessive phone calls or messages
- receiving multiple SIM cards or phones
- evidence of drug-related activity
- fearfulness, secrecy or reluctance to explain whereabouts
- increased involvement in offending or anti-social behaviour.

Missing episodes can be particularly significant and may indicate that a child has been trafficked for the purpose of criminal exploitation.

Staff must remember that a child involved in criminal activity may still be a **victim of exploitation and abuse**. Apparent offending behaviour must not prevent staff from considering the child's safeguarding needs.

Any concern about CCE or county lines must be reported immediately to the DSL.

In responding to concerns about county lines or criminal exploitation, the DSL will follow the current Brent Thresholds Guidance and safeguarding referral arrangements and consider appropriate specialist local or pan-London exploitation support alongside Children's Social Care and/or police involvement.

Children may be moved or trafficked for the purpose of criminal exploitation. This may constitute modern slavery and, where appropriate, the DSL will consider whether referral through the National Referral Mechanism (NRM) is required.

Where there are indicators that a child may have been trafficked or subjected to modern slavery, consideration will also be given to referral through the **National Referral Mechanism (NRM)**.

Action: Any concern about CCE or county lines must be reported immediately to the DSL. The DSL will follow the current Brent Thresholds Guidance and safeguarding referral arrangements and consider appropriate specialist local or pan-London exploitation support alongside Children's Social Care and/or police involvement.

Modern slavery, trafficking and the National Referral Mechanism

Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour.

Children may be exploited through:

- sexual exploitation
- criminal exploitation
- forced labour
- domestic servitude
- forced criminality
- trafficking
- slavery or servitude
- other forms of exploitation.

Children may not recognise themselves as victims and may appear to cooperate with those exploiting them because of grooming, coercion, fear, threats, dependency or manipulation.

Apparent compliance with criminal or exploitative activity must not prevent staff from considering whether a child may be a victim of abuse or exploitation.

Possible indicators may include:

- unexplained travel or movement
- going missing
- fear of particular individuals
- lack of control over money or identification documents

- appearing to be under the control of another person
- unexplained injuries
- being required to work excessively
- being prevented from attending education
- involvement in criminal activity which appears organised or controlled by others.

Any concern that a child may be a victim of trafficking, modern slavery, forced criminality or other exploitation must be reported immediately to the DSL.

The DSL will consider referral to Brent Children's Social Care and/or the police and whether a referral through the **National Referral Mechanism (NRM)** is required.

The school will work with relevant agencies to support and protect any child who may have been trafficked or exploited.

CSE (Child Sexual Exploitation)

Child Sexual Exploitation (CSE) 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 into sexual activity.

The child may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact and can also occur through the use of technology.

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

Sexual exploitation may involve children receiving something such as accommodation, drugs, gifts, money, status or affection in connection with sexual activity. It may also involve grooming children to participate in sexual activity or to create or share sexual images.

Most sexual abuse is committed by individuals known to the victim. Children may also be moved or trafficked for the purpose of sexual exploitation, which may constitute modern slavery.

Action: Staff must report any concerns about CSE immediately to the DSL and must not investigate the concern themselves. The DSL will assess the risk and consider referral to Brent Children's Social Care and/or the police, alongside relevant specialist exploitation services. Where trafficking or modern slavery is suspected, the DSL will also consider whether a referral through the National Referral Mechanism is required.

Child-on-child abuse

Children can abuse other children. Child-on-child abuse can take place inside or outside school and online. It may occur between two children or within groups and may be a one-off incident or part of a wider pattern of abuse.

Child-on-child abuse includes, but is not limited to:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying
- Abuse in intimate personal relationships between children
- Physical abuse
- Sexual violence
- Sexual harassment
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos, **including images digitally altered or wholly generated using AI**
- Upskirting
- Initiation/hazing-type violence and rituals.

Abuse will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys". Staff must recognise that the absence of reports does not mean that child-on-child abuse is not occurring.

The school recognises the relationship between misogyny/misandry, harmful sexual behaviour and child-on-child abuse and will challenge attitudes and behaviours that could contribute to the normalisation of sexual harassment, sexual violence or other abuse.

Action: Any concern about child-on-child abuse must be reported to the DSL. Staff should record the concern but should not investigate it. The DSL will consider the needs and safety of all children involved, including the victim, alleged perpetrator(s) and other affected children, and will consider whether Children's Social Care and/or police involvement is required.

Cybercrime

Cybercrime is criminal activity committed using computers, digital devices and/or the internet.

It can broadly be divided into:

Cyber-enabled crime – existing crimes that can be committed or increased in scale or reach through the use of technology.

Cyber-dependent crime – offences that can only be committed using computers, computer networks or other forms of information and communications technology.

Cyber-dependent crimes may include:

- unauthorised access to computers or networks, commonly referred to as hacking
- accessing a school or other computer network without permission
- denial-of-service or distributed denial-of-service attacks
- creating, supplying or obtaining malware
- using viruses, ransomware, spyware, botnets or Remote Access Trojans
- other activity intended to compromise or disrupt computer systems or networks.

Children with particular skills or interests in computing and technology may inadvertently or deliberately become involved in cyber-dependent offending.

Staff should not automatically treat such activity solely as a disciplinary matter. The child's safeguarding needs, motivation, vulnerability and the possibility of coercion, exploitation or grooming should also be considered.

Any concern about a child's involvement in cybercrime must be reported to the DSL.

The DSL will consider whether:

- there are wider safeguarding concerns
- police involvement is appropriate
- parents/carers should be informed
- specialist intervention would be beneficial
- a referral to the **Cyber Choices** programme should be considered.

Cyber-enabled offending, including online fraud, online child sexual abuse and exploitation, cyberbullying and other harmful online behaviour, will be managed through the school's wider safeguarding, behaviour and online safety procedures as appropriate.

Domestic Abuse and Operation Encompass

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. It can include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological or emotional abuse.

Children can be victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse. Exposure to domestic abuse can have a serious and long-lasting impact on a child's health, wellbeing, development and ability to learn.

Preston Park participates in Operation Encompass. Under Operation Encompass, police share information with schools following domestic abuse incidents involving children, enabling appropriate support to be put in place. The DSL will ensure that information received is treated appropriately and that relevant support is provided to the child according to their individual needs.

Female Genital Mutilation (FGM)

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 for non-medical reasons.

FGM is illegal in the UK and is a form of child abuse.

All staff should be alert to the possibility that a girl may be at risk of FGM or may already have been subjected to FGM.

Possible indicators that a girl may be at risk of FGM

Indicators may include:

- a family having a history of practising FGM
- a girl discussing or being told about a special procedure, ceremony or celebration
- a girl or family planning an extended holiday to a country or region where FGM is known to be practised
- a girl saying that she is going abroad to become a woman or prepare for marriage
- a family placing particular importance on cultural or social expectations relating to FGM
- a girl having a mother or sister who has undergone FGM
- a girl expressing anxiety about an upcoming trip abroad
- unexplained or prolonged absence from school associated with travel abroad.

No single indicator proves that FGM is planned. Staff must use professional curiosity and report concerns to the DSL.

Possible indicators that FGM may already have taken place

Indicators may include:

- difficulty walking, sitting or standing
- spending longer than usual in the toilet
- frequent urinary, menstrual or pelvic problems
- prolonged or repeated absence from school
- noticeable behaviour changes following an absence
- reluctance to take part in physical activity
- disclosure or reference to having undergone a procedure.

Staff must not examine a child.

Any concern that a girl may be at risk of FGM must be reported immediately to the DSL and managed in accordance with local safeguarding procedures.

Where a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher has a statutory duty to report this personally to the police.

The statutory reporting duty does not apply where FGM is merely suspected or where the child is thought to be at risk, but such concerns must still be reported immediately to the DSL and appropriate safeguarding action taken.

Working with external agencies

Safeguarding children is a shared responsibility.

Preston Park Primary School will work collaboratively with Brent Children's Social Care, the police, health services, education services and other relevant agencies to safeguard children and provide appropriate support.

Where appropriate, the school will contribute to:

- Early Help/Family Help assessments and plans
- Child in Need assessments
- section 47 enquiries
- strategy discussions
- child protection conferences
- core groups
- multi-agency meetings
- exploitation and contextual safeguarding processes
- other relevant safeguarding assessments and interventions.

Information will be shared where it is necessary and proportionate to safeguard or promote the welfare of a child.

Fear about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Where appropriate, the wishes and feelings of the child will be taken into account.

Professional disagreement and escalation

The school expects staff to respectfully challenge decisions or actions by other professionals where they believe these do not adequately safeguard a child.

Concerns should initially be addressed through normal professional discussion and the school's internal safeguarding escalation arrangements.

Where professional disagreement cannot be resolved promptly and the school continues to believe that a child may not be receiving an appropriate safeguarding response, the school will follow the **Brent Safeguarding Children Partnership Escalation Policy**.

The DSL will ensure that:

- the reasons for professional disagreement are clearly recorded
- attempts to resolve the concern are documented
- escalation takes place without unnecessary delay
- the child's safety and welfare remain the paramount consideration.

The school will continue to take appropriate safeguarding action while any professional disagreement is being resolved.

Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

Sexual violence and sexual harassment can occur between children of any age and sex and may occur both face-to-face and online. It can occur between two children or through a group of children sexually assaulting or sexually harassing another child or group of children.

Sexual violence includes sexual offences such as rape, assault by penetration and sexual assault.

Sexual harassment means unwanted conduct of a sexual nature that can occur online and offline and may include sexual comments, sexual jokes, sexualised behaviour, displaying sexual material, sexualised online bullying and non-consensual sharing of sexual images.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one type of sexual activity but not another and can be withdrawn at any time. A child under the age of 13 can never consent to sexual activity.

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which may be harmful or abusive. HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

When considering harmful sexual behaviour, the school will consider the ages and developmental stages of the children involved and recognise that children displaying harmful sexual behaviour may themselves have experienced abuse or trauma and require support.

Staff must recognise the intersection between **misogyny/misandry and harmful sexual behaviour**. Misogynistic or misandrist attitudes and harmful online content can contribute to the normalisation of inappropriate sexual behaviour and increase the risk of sexual harassment and sexual violence.

Action: All concerns and reports of sexual violence, sexual harassment or harmful sexual behaviour must be reported immediately to the DSL. The DSL will consider the wishes of the child, immediate safeguarding needs, the risk to other children, the need for a risk and needs assessment and whether Children's Social Care and/or police involvement is required.

Serious Violence

Staff should be aware of indicators that may signal that a child is at risk from, or involved with, serious violent crime.

Serious violence may include violence associated with gangs, criminal exploitation and county lines, robbery, knife crime and other offences involving weapons or serious physical harm.

Risk factors may include:

- Frequent or unexplained absence from school
- Going missing from home, school or care
- A change in friendships or relationships with older individuals or groups
- A significant decline in school performance
- Signs of self-harm or significant changes in wellbeing
- Unexplained injuries
- Unexplained gifts, money or possessions
- Carrying weapons
- Increased involvement in antisocial behaviour or offending
- Associations with gangs or organised criminal networks
- Evidence of drug use or involvement in drug supply
- Being subject to threats, intimidation, coercion or debt bondage.

Staff must recognise that involvement in serious violence may itself indicate that a child is being exploited and should consider possible links with CCE, county lines, trafficking and modern slavery.

Action: Any member of staff who has concerns that a child may be involved in, or at risk of, serious violence must report this to the DSL immediately.

The DSL will consider the child's level of risk and vulnerability, any links to criminal exploitation, gangs or county lines, and determine the appropriate safeguarding response. This may include Early Help/Family Help, referral to Brent Children's Social Care, liaison with the police and/or other relevant specialist agencies.

Where a child is in immediate danger or there is an immediate risk of serious harm, the police must be contacted on **999**.

See also the main body of this policy for the school's procedures for responding to safeguarding concerns and allegations of child-on-child abuse.

Appendix 5: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

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

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

Suspension

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children

  Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

The role of Local Authority Designated Officer (LADO) is crucial in handling all allegations of this kind. The LADO has the responsibility to ensure that allegations about abuse are handled properly and expeditiously.

The key points for Heads of School/Chair of Governors/Management Committee to follow are:

a) Inform the LADO **within one working day** of any allegation that comes to the school's attention that meets the criteria as mentioned in section 2 of LSCB procedures.

b) When informed of the concern or allegation, no attempt should be made by Head of School/Chair of Governors/Management Committee to investigate the matter or interview the member of staff concerned or potential witnesses.

c) If the matter is referred to a multi agency meeting, the School should continue to take no action, unless advised to do so.

d) If the matter is handed back to the school, whether at the first strategy meeting or at some later stage, the School must take account of the recommendations of the strategy meeting and must liaise with the LADO about the next steps.

e) To liaise with schools HR team in these instances

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals

involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Confidentiality
The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.
The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References
When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons
After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the

school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Please refer to the Brent guidance to Disciplinary Policy and Procedure for Schools' for a detailed outline of the process.

Non-recent allegations

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

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

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

Concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

If the concern is raised via a third party, the Head of School will collect evidence where necessary by speaking:

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

The Head of School will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The Head of School will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

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

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

References

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

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

Appendix 6: Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

17. Monitoring arrangements

This policy will be reviewed **annually** by Siobhan Ali, Head of School. At every review, it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour regulation policy
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- AI
- Relationships and sex education