Anglo-Portuguese School of London

(referred to as APSoL)

Safeguarding Policy and Procedures 2026-2027

This policy is based on the 2026 Template Policy from the London Borough of Wandsworth.

This policy was adopted by the Governing Body on 6/10/2026

This policy is due for review on October 2027

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Multi Agency Safeguarding Hub (MASH) **Out of Hours**		**0208 871 6000**
Multi Agency Referral Form **(MARF)**		https://www.wandsworth.gov.uk/health-and-social-care/children-and-families/report-a-concern-about-a-child/ MARF
Wandsworth Safeguarding Children Partnership		https://www.wscp.org.uk/ **020 8871 7401**

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Police **Safer Neighbourhood Team**		**999** for emergencies and **101** for non-emergencies
Wandsworth Family Information Service -Thrive		Family Information Service thrivewandsworth@richmondandwandsworth.gov.uk Helpline - 9am to 5pm, Monday to Friday: 020 8871 7899
Wandsworth Support		Wandsworth - Community Safety – Domestic Abuse Hestia
Crimestoppers free phone		0800 555 111 [information may be passed anonymously]
TPD (Training & Professional Development)	Training & Professional Development Online	https://www.tpd.org.uk/
DFE (Department for Education) Helpline	DFE	For non-emergency advice: contact DfE (Department for Education) dedicated helpline: counter.extremism@education.gov.uk **020 7340 7264 -** Monday to Friday from 11am to 3pm (excluding bank holidays) **Home Office Prevent Duty Training**
Report **suspected extremism** online		https://www.gov.uk/report-suspicious-activity-to-mi5
Report **terrorist activity/material** online		https://www.gov.uk/report-terrorism

NSPCC (National Society for the Prevention of Cruelty to Children)	NSPCC	Reporting child abuse and neglect | NSPCC: online reporting 24 hours day **0808 800 5000** (Telephone: Monday to Friday 8am – 10pm or 9am – 6pm at the weekends.)
Female Genital Mutilation FGM	POLICE	www.gov.uk/contact-police Metropolitan Police Service Project Azure Partnership Team: 020 7161 2888 NSPCC FGM free phone helpline: 0800 028 3550 [information may be passed anonymously] GOV UK FGM: resource pack (Includes free e-learning training 'Recognising & Preventing FGM')
Whistleblowing		NSPCC helpline: 0800 028 0285 (8am-8pm Mon-Fri) help@nspcc.org.uk
Homelessness		Housing Wandsworth Local Authority https://www.wandsworth.gov.uk/housing/

School Record of Safeguarding Training:

Date the Safeguarding Policy & Procedures was shared with all staff:	Safeguarding training general: 2/9/2026 Annual online safeguarding training: 2/9/2026 Policy uploaded to : Schoool website 1/9/2026

Type of Training:	Date completed:	Next due date:
Whole School Safeguarding Training (Due annual)	2/9/26	September 2027
Senior Designated Safeguarding Lead (DSL) (Due every TWO years)	See school records	
Deputy Senior DSL (Due every TWO years)	See school records	
Whole School Staff Refresher/updates (Annual)		
Safer Recruitment Training (Due every THREE years)		
Governor Training (including on-line safety) (Due annual)		
Annual DSL Prevent Training Update (for DSLs to disseminate to ALL staff)		
On-Line Safety Training for DSL's & On-line safety Lead (Encouraged Annually)		
Trauma Informed Practice Training for DSL's (Encouraged)	See school records	

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SAFEGUARDING POLICY:

1. INTRODUCTION:

1.1 It is essential that **everybody** working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play ensuring children and young people are safe from abuse, neglect, exploitation and harm. Our school is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are **in the best interests of the child.**

1.2 Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested. Home - Wandsworth Safeguarding Children Partnership (wscp.org.uk)

1.3 Our school is a community and all those directly connected, staff members, governors, supply staff, trainee teachers, parents, families, and pupils, have an essential role to play in making it safe and secure for all.

1.4 This procedure document provides the basis for good practice within the school for safeguarding work. It should be read in conjunction with the Wandsworth Safeguarding Childrens Partnership' safeguarding Policies and Procedures Information for Professionals - Wandsworth Safeguarding Children Partnership (wscp.org.uk) and the Safeguarding Appendices document. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.

2 AIMS:

2.1 We believe that APSOL should provide a caring, positive, safe, and stimulating environment that promotes the social, physical, spiritual, and moral development of the individual child; enabling all children to thrive.

2.2 This policy document provides the basis for good practice within APSoL for safeguarding and protecting children and young people.

2.3 At APSoL we will aim to ensure that:

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

2.4 At APSoL we recognise the importance of providing an environment within our school that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and to feel confident that they will be listened to. We recognise that both mental and physical health are relevant to safeguarding and the welfare of children

2.5 APSoL's Safeguarding Policy applies to all adults working in or on behalf of APSoL and is an overarching document which demonstrates how everyone working in school, shares an objective to help keep young people safe from harm and abuse. We are committed to safeguarding and promoting the welfare of all of our pupils and will always take a considered and sensitive approach in order to support all pupils and we recognise that the safety and welfare of each pupil is of paramount importance. We recognise that all adults within the school, including permanent, supply staff, temporary staff, trainee teachers, volunteers, parents, and governors, have a full and active part to play in protecting our pupils from harm.

2.6 **We aim to ensure that:**

- young people within our school feel safe at all times.
- our ethos promotes high levels of self-confidence and self-esteem in all of our pupils.
- all members of our school community are safe and are able to put the welfare of pupils first without concern that there will be any negative consequences attached to their actions.
- positive relationships between all members of IAPSoL community are promoted and nurtured.
- all adults who have contact with young people in school have been properly vetted and cleared as suitable to work with and support young people in our care.
- all adults who have contact with young people in school have been trained to undertake their safeguarding responsibilities effectively.
- parents have a solid understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

3 SCOPE

3.1 In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEN (Special Educational Needs) it is up to 25 years of age.

3.2 This policy applies to all members of staff in our school, including all permanent, temporary and support staff, Trainee Teachers, governors, volunteers, contractors and external service or activity providers.

4 LEGISLATION & STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026) and Children's Wellbeing and Schools Act 2026 to comply with current guidance and the arrangements agreed and published by the three statutory safeguarding partners and one strategic partner, who together form the Wandsworth Safeguarding Children Partnership.

This policy is also based on the following legislation:

- 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 conducting an interview to be trained in safer recruitment techniques.
- The Children Act 1989 (and 2004 amendment), and the Children's Well-being and Schools Act (2026) which provides a framework for the care and protection of young people.
- 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, (2020) which outlines when people with criminal convictions can work with young people.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to young people.
- Statutory guidance on the Prevent duty 2023, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- Crime and Policing Act 2026 to recruit safely and tackle the epidemic of serious violence and violence against women and girls.

Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make the necessary arrangements for ensuring that their functions relating to the conduct of APSoL are exercised with a view to safeguarding and promoting the welfare of children who are pupils at APSoL. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

Under Section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to co-operate with the local authority to improve the wellbeing of children in the local authority area.

Under Section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school or further education institution to supply information in order to perform its functions. This must be complied with.

Associated local procedures can be found on the Wandsworth Safeguarding Children Partnership website.
See Wandsworth Safeguarding Children Partnership website

4.1 Human Rights Act 1998, Equality Act 2010 and the Public Sector Equality Duty

APSoL recognises that safeguarding is intrinsically linked to upholding the rights and freedoms of all children. We acknowledge our legal obligations under:

4.1.1 Human Rights Act 1998 (HRA) LINK

We understand that it is unlawful for any public authority, including a school, to act in a way that is incompatible with the rights set out in the European Convention on Human Rights. Children have, for example:

- The right to education (Protocol 1, Article 2)
- The right to be free from degrading treatment (Article 3)
- The right to respect for private and family life (Article 8)
- Our safeguarding and child protection procedures aim to ensure that no child in our care is subject to inhuman or degrading treatment, and that their right to be heard and respected is fully upheld.

4.1.2 Equality Act 2010 LINK

We are committed to protecting children from unlawful discrimination, harassment and victimisation on the basis of any protected characteristic (including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

We will monitor and address any behaviour, whether staff-to-child or child-on-child, that could amount to discrimination, bullying or harassment (including prejudice-based and discriminatory bullying).

Where there is evidence that certain groups (e.g. girls, pupils from a particular ethnic group, or LGBTQ+ pupils) may be disproportionately subject to harassment or abuse, we will take proportionate measures (so-called "positive action") to mitigate potential harm and meet pupils' specific needs.

4.1.3 Public Sector Equality Duty (PSED) LINK

We acknowledge our legal obligation to have due regard to:

- Eliminating discrimination, harassment, and victimisation.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.
- Recognise that safeguarding issues such as sexual violence, racist incidents or homophobic and transphobic bullying can be closely linked to discriminatory attitudes. To protect pupils effectively, staff will proactively track patterns of behaviour and will intervene early to challenge any form of discrimination or abuse.

2.1.4 Implementing These Duties

- **Whole-School Culture:** We integrate human rights and equality principles throughout our safeguarding training, policies and day-to-day practice, ensuring staff are aware of their duties and consistently model inclusive and respectful conduct.
- **Policy Monitoring:** routinely review policy and related procedures (e.g., Anti-Bullying, Behaviour, Code of Conduct) to ensure they promote and uphold the rights of all children, irrespective of their background or characteristics.

- **Record-Keeping and Data:** monitor and evaluate safeguarding incidents and patterns in a relevant and proportionate way (e.g. bullying or harassment cases). Considering protected characteristic in order to identify emerging concerns and evidence-based solutions.
- **Listening to Children**: value the voice of the child and ensure mechanisms for pupils to report concerns are robust, visible, readily accessible and well publicised. Take any report seriously and respond in a timely, child-centred way.

By embedding statutory obligations into the school's safeguarding framework, we can demonstrate a strong commitment to ensuring that no child is disadvantaged, harassed or denied the ability to thrive and learn in a secure, respectful environment.

5 DEFINITIONS

Safeguarding children is the action we take to promote the welfare of children and protect them from harm. **Safeguarding and promoting the welfare of children** is defined within Keeping Children Safe in Education 2026 (page 8) as:

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

Child protection is part of this definition of safeguarding and promoting the welfare of young people and refers to "activity that is 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 in foster care and residential care, as well as online." (Working Together to Safeguard Children 2026 – page 9)

Abuse is a form of maltreatment of a young person and may involve inflicting harm or failing to act to prevent harm. **Appendix 1** explains the different types of abuse in more detail.

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

Children are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021. Within this policy we use the terms Children and Young People to refer to anyone under the age of 18.

The following three statutory 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 make arrangements

to work together to safeguard and promote the welfare of local children and young people, including identifying and responding to their needs. The fourth strategic partner is **Education.**

- Wandsworth Borough Council (LA)
- NHS South West London Integrated Care Board.
- Metropolitan Police

6. Equality Statement

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

Anti-Racist Practice is currently identified as the Wandsworth Safeguarding Children Partnership Priority 3:

Priority 3
Anti-Racist Practice - Actions, Behaviour, and Culture across the Partnership and within all organisations. This priority focuses on embedding anti-racist values across all levels of safeguarding work. It aims to challenge discriminatory practices, improve cultural competence, and ensure that children, families, and staff experience equitable treatment and outcomes regardless of race or ethnicity.

We will give special consideration to young people who:

- Have special educational needs (SEN) or disabilities (see section 9)
- 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
- Are currently or previously have been allocated a social worker

7 ROLES AND RESPONSIBILITIES

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, trainee teachers and governors in APSoL and is consistent with the procedures of the Wandsworth Safeguarding Children Partnership.

The policy and procedures also apply to extended school and off-site activities.

The curriculum is designed so that safety issues within each subject are discussed and safe practices explained, such as using equipment properly in PE, Science and Design and Technology. Appropriate staffing levels will be maintained

at all times when the curriculum is being delivered outside of APSoL site. Appropriate and agreed pupil/adult ratios are always maintained. The visit leader always undertakes a risk assessment for any visits or trips to

ensure pupils are safeguarded and protected from harm before the event is finally authorised by the Headteacher / Principal, who is advised by APSoL Educational Visits Co-ordinator.

Visiting speakers, with correct clearance and/or constant supervision are always welcome into school so that they can impart specialist knowledge to the pupils.

Our governing body recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance; Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026), Key statutory and non-statutory guidance and any locally agreed inter-agency procedures.

7.1 All Staff

All staff will read and understand **PART 1** in full the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2026, and review this guidance at least annually.

All staff will be aware of:

- Systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour for learning policy and the safeguarding response to young people who go missing from education.
- The family help process and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

Section 9 and **Appendix 5** of this policy outline in more detail how staff are supported to do this.

7.2 Designated Safeguarding Lead

The school's Designated Safeguarding Lead (DSL) with overall designated responsibility for safeguarding is Marta Correia-Abbott. We have a deputy designated safeguarding lead (s), Oscar Fielder and Andrew Findlater to ensure

there is always appropriate cover for this role. The DSL is a member of the Senior Leadership Team. The DSL takes lead responsibility for child protection, online safety and wider safeguarding.

- Robust cover arrangements for when the DSL is unavailable are in place (for example a confidential shared mailbox to make sure safeguarding concerned are received, monitored and acted on without delay)
- When the DSL is absent, the deputies as noted above will act as cover. The Deputy DSLs are trained to the same level as the DSL.

The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. However, if the DSL and deputies are not available, concerns should be reported to any other member of the senior leadership team (SLT). In the exceptionally rare circumstance that no member of SLT is available, advice should be sought by phoning Wandsworth Multi Agency Safeguarding Hub (020 8871 6622).

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 /safeguarding matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of young people.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Prevent/Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Ensure that employees and governors are aware of, understand and can discharge their role and responsibilities under this policy.
- Attend any applicable training.

The DSL will also keep the Headteacher / Principal informed of any issues and liaise with local authority case managers and designated officers for child protection in relation to concerns as appropriate. The DSL will also help to promote positive educational outcomes by sharing with staff information about welfare, safeguarding and child protection issues that young people (including those with a social worker) are experiencing or have experienced. This will include ensuring staff know who these young people are, understand the barriers to learning which they may face, maintain high expectations and offer appropriate support and adjustments. The full responsibilities of the DSL and deputies are set out in their job description.

The DSL is responsible for the oversight and analysis of safeguarding records (e.g. through electronic records system) to identify patterns and inform strategy.

The DSL is responsible for overseeing mental health concerns that constitute safeguarding issues, ensuring timely referrals and coordination with services such as CAMHS, mental health support team's (MHST). counselling, or other pathways. All staff should be aware that mental health issues can be both a cause and symptom of abuse, harm, neglect or exploitation.

The school will consider access for the DSL to regular safeguarding supervision to support reflective practice and sound decision-making in complex cases. Consideration will be given to supervision and debriefing for staff working directly with children on child protection, child in need or Family Help plans, recognising the emotional impact and complexity of safeguarding on all members of staff and on DSLs.

Further details of the DSL role can be found in Keeping Children Safe in Education 2026 (Para 125 129 /Pg 36-37 & Annex B Pg 181-1870

7.3 Governing Body

The Governing Body will approve this policy at each review; ensure it complies with the law and hold the Headteacher / Principal to account for its implementation. The **governing body** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

The Governing Body will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full Governing Body.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher / Principal, where appropriate (see Appendix 3 & Appendix 4 which includes an allegation flowchart).

The Governors shall ensure that children are taught about how to keep themselves and others safe against online and offline threats. This includes ensuring that any children with additional needs have tailored provision.

The Governors will understand the local criteria for action and assessment and ensure that these are reflected in policies and procedures.

Safeguarding is reviewed annually by the Governing Body, including filtering and monitoring systems, training completion, and recruitment practices. Records of these reviews will be kept and governors will read Keeping Children Safe in Education 2026. **Section 14 has information on how governors are supported to fulfil their role.**

7.4 Headteacher / Principal

The Headteacher / Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
  - Communicating this policy to parents when their child joins APSoL and via APSoL's website.
- Ensuring that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.
- 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.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3).

7.5 Site Security

APSoL aims to provide a secure school site but recognises that the site is only as secure as the people who use it. Therefore, all people on the site must adhere to the rules, which govern it. It is recognised that laxity can cause potential problems in safeguarding. Therefore, APSoL ensures that:

- School doors are locked at all times as there are no boundary security gates. This door is only unlocked for 15 minutes in the morning for drop offs and 15 minutes at home-time for pick ups.
- Duty / Admin / Front Office staff ensure that no unauthorised persons enter APSoL site.
- The identity will be checked of all visitors and volunteers coming into school. Visitors are expected to sign in and out by sign in APP and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance. The visitor policy is located:
- Doors are kept locked to prevent intrusion, use of Ajax aensures additional level of safety.
- Visitors and staff may drive on APSoL site only outside of lesson changeovers.
- Visitors only enter through the main entrance. They must sign in at reception and be reminded to wear their visitor badge while on site.
- Pupils are only allowed home with adults/carers with parental responsibility or when confirmed permission has been received in advance.
- New staff induction includes information about site safety.
- Should a young person leave APSoL premises without permission then staff must inform the DSL and Susan Spinola attendance officer in person/via email **immediately**. Parents and police will then be informed, as set out in the missing child procedure, outlined in Appendix 5.
- There are robust procedures for lockdown and fire evacuation.

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

7.5.1 OUT OF SCHOOL PROVIDERS

We will ensure that when our premises are used by organisations or individuals outside of the school day all reasonable steps are taken, as required by law, to ensure the safety of the children and to protect them from harm.

We will ensure that providers, their staff, and volunteers have a duty of care toward the children who attend. The document "After – school clubs, community activities, and tuition – safeguarding guidance for providers" (February 2026) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

We will also signpost outside providers to the Government guidance Out-of-school settings: safeguarding guidance for providers – which details Safeguarding guidance, e-learning and resources for providers of after-school clubs, activities and tuition, and other out-of-school settings. More guidance for sports activities can be found in the NSPCC information Safeguarding in Sports.

We will follow our safeguarding policies and procedures, as with any safeguarding allegation, including informing the LADO, if we receive an allegation relating to an incident that has happened when an individual or organisation has

used our school premises for the purposes of running activities for children. This will cover any community group, sports associations, or service provider that runs extra-curricular activities on our school site.

7.6 Screening

The Principal or authorised employee have the statutory power to search a pupil/s or his/her possessions, without consent, where they have reasonable grounds for suspecting that a pupil/s may have prohibited items like weapons, drugs, or stolen goods. The Principal or authorised employee may also use reasonable force to carry out a search when required. Full details of prohibited items and APSoL 's procedures can be found in APSoL's Behaviour policy and reflect the DfE guidance Searching, Screening and Confiscation Advice for schools – JULY 2022

7.7 Behaviour and use of Reasonable Force

APSoL's approach to behaviour management is underpinned by principles of dignity, compassion and fairness, with the aim of promoting positive relationships and de-escalating conflict wherever possible. APSoL will follow the expectations outlined in the updated DfE guidance Restrictive interventions, including use of reasonable force in schools - April 2026

In exceptional circumstances, staff may need to use reasonable force to prevent a pupil from:

- Hurting themselves or others
- Causing significant damage to property
- Seriously disrupting the learning or safety of others

Reasonable force refers to 'using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances'. It can include a range of actions, such as:

- Physically interposing between pupils
- Standing in the way of a pupil
- Leading a pupil by the arm away from a situation
- In extreme cases, holding a pupil to prevent harm

Key principles:

- Any use of force must be proportionate to the risk presented and be in the best interests of the child.
- Staff must always try to use de-escalation strategies first.
- Force must never be used as a punishment.

Staff may use reasonable force to prevent pupils from harming themselves or others, from damaging property or from causing disorder. This should always be a last resort, used proportionately, and in line with statutory guidance from the DfE and local authority protocols. Any use of reasonable force must take account of individual pupil needs, particularly for those with SEND or a history of trauma and acknowledge that restraint is likely to impact on the well-being of the child. Staff should refer to APSoL's Behaviour Policy and Reasonable force in schools Policy for further

guidance. Incidents involving reasonable force must be recorded and reported to the DSL, and parents should be informed as soon as reasonably possible.

7.7.1 Additional Considerations for Vulnerable Pupils

APSoL recognises that the use of physical intervention may pose particular risks for pupils with:

- SEND or medical needs (including sensory or physical difficulties and allergy conditions)
- Communication challenges or trauma histories, and
- Mental health needs or emotional regulation difficulties.

In line with Keeping Children Safe in Education 2026, staff must take extra care when considering the use of force with these pupils. Reasonable adjustments must be made to reflect pupils' individual needs and vulnerabilities. For pupils with EHCPs, medical plans, or behaviour support plans, staff will follow bespoke strategies for crisis management and regulation, and in line with the DfE statutory guidance Supporting pupils at school with medical conditions – December 2015.

8. Confidentiality, Consent and Information sharing

APSoL's Data Privacy policy is available as a separate document and outlines how personal data may be shared.
In respect of safeguarding, it is important to recognise that all matters relating to Safeguarding are confidential and the head teacher or the Designated Safeguarding Lead will disclose any information about a pupil to other members of staff on a need-to-know basis only. We also recognise that:

- Timely information sharing is essential to effective safeguarding; it is vital for effective identification, assessment, and allocation of appropriate service provision.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of young people.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a young person at risk.
- Staff should never promise a young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests.
- The DfE's Information sharing advice for safeguarding practitioners - March 2015 includes 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).
- Confidentiality is also addressed in this policy with respect to record-keeping in **Section 13,** and allegations of abuse against staff in Appendix 3.

8.1 Use of Images

At APSoL we will:

- seek pupils' consent and parental consent for photographs to be taken or published (for example, on our website, X or Instagram accounts, or in newspapers or publications, for teaching and learning purposes, or for posterity)
- use only the pupil's first name with an image
- ensure that pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- ensure that pupils do not take photographs or video images of other students without their express permission and the permission of a member of staff.

There is a policy for remote learning that demonstrates an understanding of how to follows safeguarding procedures when planning remote education strategies and teaching remotely.

9. Recognising Abuse and Taking Action

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

9.1 Significant Harm

If a young person is suffering or likely to suffer significant harm, or is in immediate danger, the DSL, or the deputy DSL if the DSL is not available, must be informed as soon as possible. The DSL /DDSL will make a referral to children's social care and/or the police **immediately**. Please note that if required anyone can make a referral.

The DSL will make a referral through telephoning the **Wandsworth Multi Agency Safeguarding Hub (MASH)**

Mon - Fri, 9.00am - 5.000pm - **020 8871 6622**
Out of hours (Weekdays after 5:00 p.m. and weekends) - **020 8871 6000**
Email **-** mash@wandsworth.gov.uk
The DSL will then complete the referral through submission of a MARF (Electronic Multi Agency Referral Form) which should be completed within 24 hours of making a telephone referral.

9.2 Dealing with Disclosures

If a young person discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Understand that it must be hard for young person to disclose this to you and seek to build their trust.
- Stay calm and do not show that you are shocked or upset.
- Tell the young person they have done the right thing in telling you.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep the information a secret or to yourself.
- Safeguarding issues can manifest themselves via child-on-child abuse. This may include but not limited to: bullying (including cyber bullying), gender-based violence, teenage relationship abuse, sexual harassment, sexual violence

and assaults, harmful sexual behaviours and sexting. Staff should recognise that young people can abuse their peers and family members.

- Write up your conversation as soon as possible in the young person's own words and record in full. Stick to the facts, and do not record your own judgments.
  - At APSoL we use the following recording and reporting system CPOMS. When reporting a concern the following steps should be taken: the DSL or DDSL in charge on the day, will provide actions and next steps.
- If it is appropriate to make a referral to young children's social care and/or the police directly (see Section 9.1) tell the DSL as soon as possible that you have done so.
- Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL.
- Further information about what to do if you are worried that a child is being abused is available within the following Government Guidance: What to do if you're worried a child is being abused – Advice for practitioners – March 2015
- Use the following check list when responding and dealing with a disclosure

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

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

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

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

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

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

9.3 Pastoral Concerns

9.3.1 Rationale

APSoL recognises that pastoral care and safeguarding are closely interlinked. Whilst not all pastoral concerns indicate abuse or immediate risk of harm, minor worries or 'nagging concerns' about a child's wellbeing can, if left unaddressed, grow into more serious problems. Our staff must therefore remain vigilant and respond proactively to any changes or signs of distress in a pupil's life.

9.3.2 What is a Pastoral Concern?

A pastoral concern can be any emotional, social or personal issue that may affect a pupil's wellbeing or behaviour. Unlike clear-cut child protection incidents (e.g. disclosure of abuse), pastoral concerns often manifest gradually and can appear low-level. Examples might include:

- Emotional: Persistent sadness, sudden mood swings, tearfulness, withdrawal from peers, signs of anxiety or low self-esteem.
- Behavioural: Noticeable drop in engagement, aggressiveness, unusual risk-taking or attention-seeking behaviour, being unusually quiet or over-compliant.

- Social: Friendship difficulties, isolation or exclusion from peer groups, concerning changes in peer relationships, rumours of bullying.
- Physical/Presentation: Neglect of personal hygiene, uncharacteristic weight change, excessive tiredness, or non-specific physical complaints.
- Academic: Dramatic shift in academic performance, frequent non-completion of homework, lateness, or unexplained absences that may indicate deeper problems.

9.3.3 Responding to Pastoral Concerns - Initial Identification

Any staff member may notice a pastoral concern. Staff should record the concern as a pastoral concern. If immediate pastoral support is warranted, the staff member should inform the pupil's class teacher. Andrew Findlater will be able to advise staff on pastoral matters.

9.3.4 Pastoral Support

APSoL's safeguarding and pastoral team will explore possible causes, speak to the pupil, and, where appropriate, contact parents/carers to build a fuller understanding of the situation.

Early interventions may include:

- Mentoring or counselling sessions
- Adjustments in class seating/activities
- Peer mediation (if conflict among pupils is contributing)
- Recommendations for external services (e.g., mental health resources)

Thresholds and Escalation

Low-level concerns can be warning signs of more serious issues e.g., emotional abuse, domestic conflict, self-harm risk, so staff must remain open-minded.

If, at any point, the concern appears to indicate actual or potential risk of harm, staff must escalate to the DSL or deputy DSL immediately, in line with Section 9 (Recognising Abuse and Taking Action).

Allocated staff should maintain ongoing communication with the DSL, who will decide whether a referral to external agencies (children's social care, CAMHS, police) is needed.

Monitoring and Review

The pastoral team and DSL will review pastoral logs (e.g. system entries) to identify patterns or concerning trends, such as multiple low-level notes over time that, collectively, point to neglect, bullying or emotional abuse.

Pupils receiving pastoral support should have their progress and wellbeing regularly monitored and documented

9.3.5 When Pastoral Concerns Become Safeguarding Concerns

Some pupils may initially present with low-level difficulties (e.g. changes in behaviour or frequent unexplained absences) that don't immediately suggest abuse or harm. However, over time, these might signal underlying problems such as neglect, emotional abuse, exploitation or grooming.

Where staff observe a pattern or escalation, for example, repeated expression of self-harm thoughts, sudden fear of going home, or references to domestic arguments, the concern should be escalated to the DSL without delay.

All staff are reminded to 'think the unthinkable' & 'It could happen here'. Even seemingly small pastoral concerns may be an indicator of safeguarding risk. Early reporting is essential, when unsure, seek support and record.

9.3.6 Supporting Pupils and Families

APSoL recognises that early dialogue with parents/carers and Family information & early help services can often prevent minor issues from becoming more serious. Where appropriate the safeguarding team will engage parents in supportive conversation, signpost local services and explore strategies that address the pupil's difficulties. Staff will take particular care to distinguish between current safeguarding concerns and historic information to ensure past issues are presented with appropriate context.

APSoL will adopt a child-centred approach, respecting the child's wishes and feelings, and ensuring they understand that caring adults are ready to listen and help.

By proactively addressing pastoral concerns, APSoL aims to cultivate an environment where all pupils feel supported, understood and safe. Staff at every level play a vital role in identifying the early signs of difficulty and ensuring these concerns do not escalate into serious safeguarding issues.

9.4 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Examples of mental health problems that may develop into safeguarding concerns, including self-harm, suicidal ideation, eating disorders and risk of suicide

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, including significant changes in behaviour, difficulty sleeping and physical signs of self-harm.

Where children / young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these young people's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action

should be taken and reported to the DSL or a deputy. Information should be sourced on mental health interventions on offer which are safe, effective and appropriate for the child's needs, this may include local referral routes for specialist mental health support, including calling 999 or taking the child to A&E if they're in immediate danger.

The Department for Education has published advice and guidance on Preventing and Tackling Bullying – July 2017, and Mental Health and Behaviour in Schools – November 2018 . In addition, Public Health England has produced a range of resources to support schools in promoting positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Better Health - every mind matters.

Ongoing staff training highlights mental health as part of safeguarding. The DSL/Deputy DSL brief staff on steps they should take if they feel that a child is in danger.

9.5 Online Safety

9.5.1 Rationale and Context

APSoL recognises that technology is a significant component in many safeguarding and wellbeing issues, and that pupils are at risk of abuse and other harms both online and offline. APSoL's online safety provision aims to comply with the Online Safety Act (OSA – Explainer – April 2025 / OSA Changes explained – August 2025) we will ensure that:

Staff and pupils understand the risks associated with the online environment.

There is a robust approach to filtering, monitoring and using technology safely, which is reviewed annually.

Pupils, staff and parents are empowered to report online safety concerns promptly.

APSoL provides age-appropriate education and training on how to stay safe online, and to protect under-18s from harmful online content. Our effective approach to online safety empowers our setting to protect and educate the whole school/college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm
- commerce: the risks from things like online gambling, inappropriate advertising, phishing or financial scams. Risks that can be applied to Children and young people and to staff.

Age-appropriate education and training will include content relating to:

- Pornography, sharing images, deepfakes, and misogynistic influencers
- Self-harm, suicide and suicidal ideation content

- Eating disorder content
- Generative AI and education

This section should be read in conjunction with APSoL's:

- IT Acceptable Use (AUP) policies.
- Staff Code of Conduct, addressing the use of social media and electronic communications.
- Anti-Bullying and Behaviour for Learning policies (including cyberbullying and harassment).
- Mobile Phone Policy
- AI usage Policy

The DfE's statutory guidance Mobile phones in schools which came into force on the 29 June 2026 will be used to implement a policy that prohibits the use of mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime.

9.5.2 Roles and Responsibilities

Governing Body

- Oversees that APSoL has appropriate policies and procedures related to online safety, filtering and monitoring, in line with Keeping Children Safe in Education (KCSIE).
- Ensures regular reviews of the effectiveness of APSoL's filtering and monitoring systems.

Principal

- Ensures that adequate staffing, resources and training are in place to maintain robust online safety practices.
- Ensures that all staff understand their responsibility to keep pupils safe online.

Designated Safeguarding Lead (DSL)

- Takes lead responsibility for online safety, with a working knowledge of APSoL's filtering and monitoring arrangements.
- Receives alerts from APSoL's monitoring software and responds to any concerns in line with the Child Protection-Safeguarding Policy.
- Liaises with external partners (e.g. local authority, police, and online safety organisations) where online risks or crimes are suspected.

All Staff

- Maintain an appropriate level of professional curiosity about pupils' online activities.
- Report any suspicious or concerning activity or behaviour immediately to the DSL.
- Adhere to the Staff Code of Conduct, ensuring boundaries are not blurred when communicating online with pupils.

Mobile Phones and Cameras

Staff are allowed to STATE APSoL's PROCEDURES & EXPECTATIONS as per APSoL's policy. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in APSoL.

9.5.3 Filtering and Monitoring

In line with KCSIE 2026, the governing body ensures that appropriate filtering and monitoring arrangements are in place to safeguard children from harmful content online. This includes regular review of IT protocols, AI-related risks, and remote learning provisions.

These systems are regularly checked to ensure they remain fit for purpose and respond effectively to emerging threats, in line with the DfE filtering and monitoring standards.

The DSL (or a deputy) monitors logs and alerts generated by the software and responds in line with safeguarding procedures if any child is at risk.

Filtering and Monitoring is included in the full staff CPD programme and induction programmes, governing body/trustees will be supported to understand their role in Filtering and Monitoring.

There is an annual review process undertaken by SLT with governors, including to ensure that filtering and monitoring is effective from a technical perspective.

9.5.4 Education and Training

- **Pupils -** Receive age-appropriate teaching about online safety through the PSHE curriculum, Relationships, Health, Sex Education (RHSE), computing lessons and pastoral sessions.

  Programmes covering online harms such as sharing images, deepfakes, pornography and misogynistic influencers, and when and where to seek will be delivered, as well as safe online communication, cyberbullying, privacy settings, grooming and radicalisation. Topics will also include age verification to access cyberflashing, epilepsy trolling and encouraging serious self-harm. Pupils are guided on where and how to seek help if they feel uncomfortable or threatened online.

- **Staff -** Undertake regular (at least annually) online safety training to ensure they are aware of current risks, digital trends and how best to respond to concerns. Staff are trained to recognise the indicators of child-on-child online abuse, sexting or online grooming, and supporting to understand how they can overlap with other safeguarding concerns (e.g. Child Sexual and Criminal Exploitation, radicalisation, incidents may involve serious physical assault

and harm, or threat of harm with a weapon). There is an acknowledgement that it is a safeguarding issue for both the victim and the alleged perpetrator and that timely, evidence-based support can be key for prevention

- **Parents/Carers -** APSoL offers advice and guidance to parents/carers on keeping their children safe online, including recommended parental controls, privacy settings and managing social media use.
  Parents/carers are encouraged to report concerns relating to online safety and to work in partnership with APSoL to address incidents.

9.5.5 Responding to Online Safety Incidents

Any staff member who suspects or is alerted to an online safety incident must document the concerns and report them to the DSL or deputy DSL immediately. Where a pupil is found to have excessively or persistently accessed harmful or inappropriate content, the DSL will discuss this with them and their parents/carers to explore the underlying reasons and provide pastoral or external support if necessary.

For incidents involving potential or actual criminal activity (e.g. child sexual abuse material, grooming, hate crimes), the DSL will immediately liaise with the police and/or local authority children's social care as required. The DSL should be familiar with the guidance regarding online safety incidents, including that from the UK council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people. Pupils who carry out child-on-child online abuse will be managed under the behaviour and anti-bullying policies, in addition to any safeguarding and/or criminal pathways.

Centre of Expertise on Child Sexual Abuse resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. This includes support on communicating with young people, their parents / carers, signs and indicators, safety planning and a whole setting approach

Cybercrime - Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Offences under the Computer Misuse Act 1990 (CMA) have risen substantially and the school recognises that young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications.

The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. 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
• 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 skills 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.

9.5.6 Remote Learning and Devices

When delivering remote learning (e.g. in cases of health-related absence or other contingencies), APSoL will ensure that safeguarding measures continue to apply online.

Staff and pupils must adhere to APSoL's Remote Learning Policy, which outlines expectations for respectful communication, data protection and child protection during online lessons. The DfE guidance on remote learning will be implemented.

The use of personal devices by staff and pupils is governed by the relevant acceptable use agreements and staff must ensure that no child is put at risk when using personal equipment or online platforms.

School-issued devices are filtered and monitored by a filtering firewall system and monitoring platform.

Pupils are explicitly taught about how to stay safe when off-site, including on their own personal devices. This takes place in across the curriculum, as well as through other means such as the static wallpaper on all school devices.

9.5.7 Artificial Intelligence

Artificial Intelligence has the power to transform education by helping teachers focus on what they do best: teaching. This marks a shift in how technology is used to enhance lives and tap into the vast potential of AI in classrooms. APSoL looks to consider the risks and challenges alongside the opportunities and benefits continue to work to ensure the safety and reliability of technology, including AI tools, to support teachers and pupils. Additional resources from the DfE for schools and educational settings can be found HERE. The guidance below supports the assessment of risk:

- Generative Artificial Intelligence (AI) in education- August 2025

9.5.8 Review

The Senior Leadership Team, in consultation with the DSL and Governance, will regularly review online safety provisions. The policy and practices will be updated in response to emerging technologies, evolving threats and updates to national guidance (including KCSIE and Working Together to Safeguard Children).

Governing body oversight ensures that the effectiveness of APSoL's approach to online safety is monitored and that the policy remains fit for purpose.

9.6 Family Help

Staff should be especially alert to the potential need for Family help (previously early help) for pupils & families who are:

- disabled or have specific health needs
- have SEND (with or without an EHCP)
- has a mental health need
- are at risk of criminal exploitation or County Lines
- are frequently missing from home or education
- has experienced multiple suspensions, is at risk of being permanently excluded from school

- are at risk of modern slavery, trafficking or sexual exploitation
- are in families experiencing domestic abuse, adult mental health or substance misuse
- are privately fostered
- are affected by imprisonment of a parent or family member
- are at risk of radicalisation
- are at risk of 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage
- are young carers

If family help is appropriate, the DSL will liaise with other agencies in setting up a multi-agency assessment. Staff may be required to support other agencies and professionals in contributing to an assessment, and the DSL may be required to act as the lead practitioner. DSLs understand the assessment process for providing Family Help and support staff to assist.

The school team are alert to YOUNG CARERS' NEEDS and recognise that caring responsibilities can impact on attendance, attainment, behaviour and wellbeing, and that early identification is essential to make sure young carers receive support. The DSL will closely monitor the case and APSoL will consider a referral to the Multi Agency Safeguarding Hub (020 8871 6622) if the situation does not seem to be improving. Details and timelines of interventions will be monitored and reviewed by the DSL through monitoring cases closely.

If the professional identifying need at level three of the threshold should look to submit an Request for Specialist support form to the Family Help team at fis@richmondandwandsworth.gov.uk indicating the level of need and intervention. The referral should always be discussed with the young person and family, with their consent clearly indicated on the form. If consent is not given, the team will look to refer if the risk is assessed as a safeguarding concern.

9.7 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 a team member to do so. If you make a referral directly (see Section 9.1), you must tell the DSL as soon as possible. The local authority will decide if a referral is needed and what course of action to take and will let the setting know the outcome. The DSL will follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
If the young person's situation does not seem to be improving after the referral, or there is a threshold disagreement, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves.

Where there are disagreements with external agencies about thresholds, decision-making or safeguarding responses, the DSL will initiate the WSCP Multi-Agency Escalation Procedure. Wandsworth escalation procedures can be found in the multi-agency escalation procedure section of the WSCP website.

See below flow diagrams for:

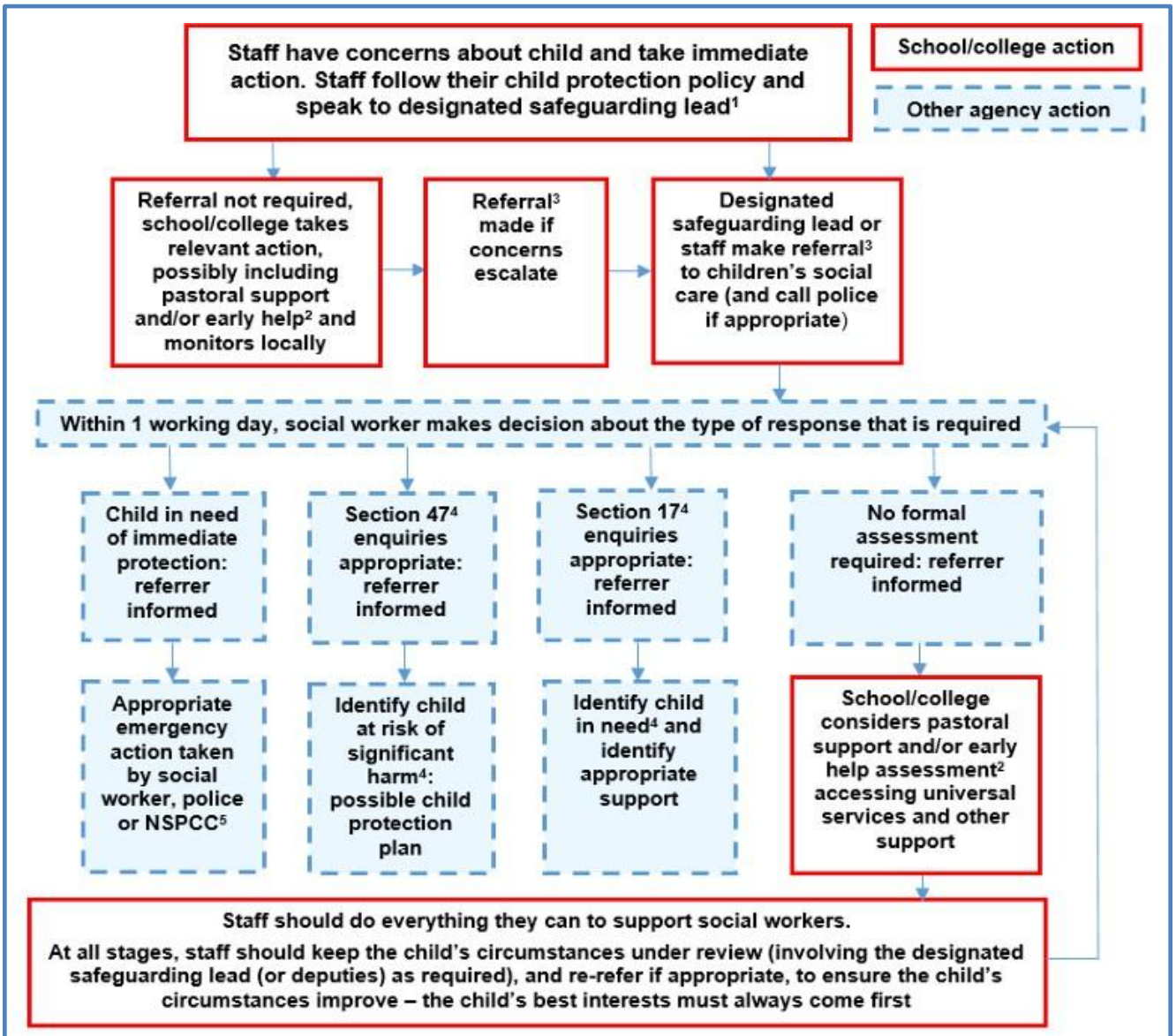
ACTIONS TO TAKE WHEN THERE ARE SAFEGUARDING CONCERNS ABOUT A CHILD (page 27)

and

PROCEDURE IF YOU HAVE CONCERNS ABOUT A YOUNG PERSON'S WELFARE (page 28)

ACTIONS TO TAKE WHEN THERE ARE SAFEGUARDING CONCERNS ABOUT A CHILD

(KCSIE 2026 – Part 1 Page 27)



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

[2] Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

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

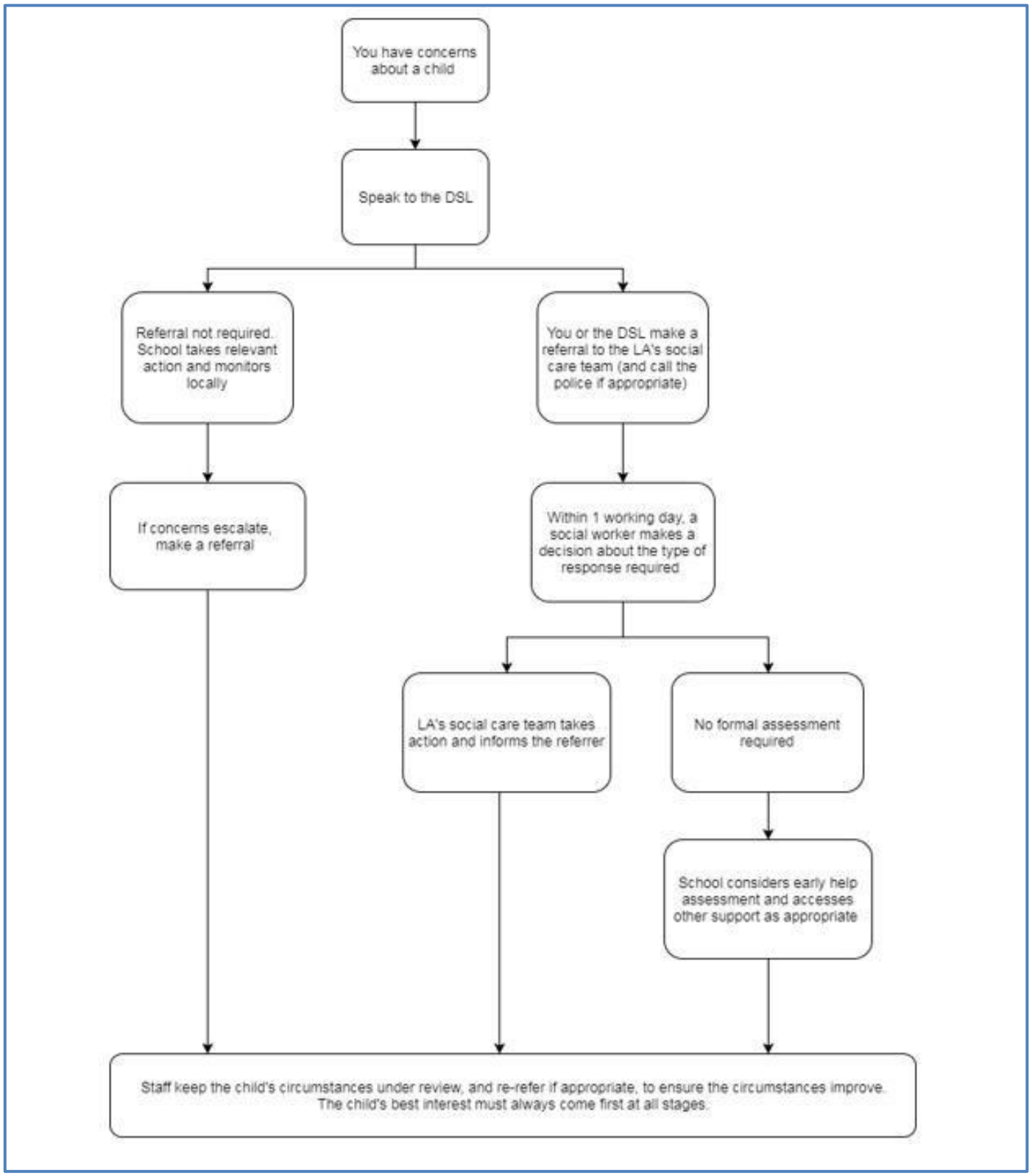
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.

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

PROCEDURE IF YOU HAVE CONCERNS ABOUT A YOUNG PERSON'S WELFARE

Procedures if you have concerns about a young person's welfare (as opposed to believing a young person is suffering or likely to suffer from harm, or in immediate danger) NOTE – If the DSL is unavailable, this should not delay action.

Child Abuse Concerns: Guide for Practitioners – GOV.UK – March 2015


You have concerns about a child
Speak to the DSL
Referral not required. School takes relevant action and monitors locally
You or the DSL make a referral to the LA's social care team (and call the police if appropriate)
If concerns escalate, make a referral
Within 1 working day, a social worker makes a decision about the type of response required
LA's social care team takes action and informs the referrer
No formal assessment required
School considers early help assessment and accesses other support as appropriate
Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

9.8 Concerns about a Staff Member or Volunteer

We have a procedure in place to manage allegations against members of staff, supply staff and volunteers (and to respond to low level concerns) which are in line with the Wandsworth Safeguarding Children Partnership procedures outlined in Information for Professionals section on the WSCP website, LADO information through the Wandsworth Family Information Service and the expectations as outlined in Part 4 of Keeping Children Safe in Education 2026 - Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors.

If you have concerns about a member of staff (including supply staff) or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to young people, speak to the Headteacher / Principal. If the concerns/allegations are about the Headteacher / Principal, speak to the Chair of Governors.The Headteacher / Principal/Chair of Governors will then follow the procedures set out in Appendix 3 & Appendix 4, if appropriate.

All allegations made about a staff member or anyone in a position of trust must be referred to the Local Authority Designated Officer (LADO) within 24 hours. The LADO for Wandsworth is Anita Gibbons. LADO can be contacted via email Lado@richmondandwandsworth.gov.uk A referral form is available to complete via this LINK

Staff are encouraged to self-refer where they feel they may have acted in a way that could be misinterpreted or have breached professional boundaries.

Allegations related to any incidents when an individual or organisation is using the school premises for the purposes of running activities for children, will follow safeguarding policies and procedures, including informing the LADO' within 24 hours.

9.8.1 Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of APSoL 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 Harm Threshold as outlined in KCSIE (Part 4) & Wandsworth Safeguarding Children Partnership LADO guidance i.e. does not indicate a risk of significant harm to a child or warrant an immediate referral to the LADO).

Concerns often cause a sense of unease or a “nagging doubt”, and can include conduct that is seemingly minor yet, when left unaddressed, could lead to an erosion of professional boundaries or a culture where more serious misconduct or abuse could go unchallenged.

Examples might include (but not exhaustive):

- Being over-friendly with pupils (e.g. having personal social media contact, meeting socially outside of school unless approved by APSoL).
- Having “banter” or using inappropriate language with children that could be seen to cross professional boundaries.
- Taking photographs of children on their mobile phone;
- Favouritism or singling out a child or group of children for special attention.

- Failing to maintain appropriate physical boundaries (e.g., not adhering to safe-touch guidelines).
- Humiliating pupils

9.8.2 Aims of the Low-Level Concerns Process

- Protect children by fostering a culture of vigilance, having the mind set 'it could happen here'.
- Maintain professional standards and uphold the Staff Code of Conduct and Teacher Standards where appropriate.
- Identify patterns of behaviour early, so that staff receive support or corrective action before concerns escalate.
- Encourage openness and the confidence to speak out, ensuring staff feel comfortable reporting concerns of any magnitude.

9.8.3 Reporting Low-Level Concerns

1. Self-reporting: Staff are encouraged to self-report, for instance, where they feel they have made a slip in conduct or sense that their behaviour may have been misinterpreted.
2. Reporting about others: Any member of staff, volunteer or contractor who has a low-level concern about another adult's conduct should share it as soon as possible with the Headteacher / Principal (or Chair of Governors if the concern is about the Headteacher / Principal).
3. Recording: The person reporting should provide a factual account of what happened, noting the date, time and context. Where the conduct in question is a potential breach of the Staff Code of Conduct, examples or evidence (if any) should be included.
4. Staff must never assume that someone else will act. Timely reporting of seemingly minor issues helps maintain the highest safeguarding standards.

9.8.4 Responding to Low-Level Concerns

1. The Headteacher / Principal (or senior leader/designated manager) will review the reported concern, including speaking to any witnesses if necessary.
2. If, upon review, the concern appears to meet the harm threshold, it will be managed as a formal allegation in line with the procedures in Section 9.8 above and referred to the LADO (or police/children's social care, if required).
3. If it does not meet the harm threshold, the Headteacher / Principal will handle the matter proportionately and confidentially at an appropriate management level.
4. This may involve additional supervision, training, reflective conversation or guidance to the person about whom the concern is raised.
5. Any patterns or recurring issues identified in the individual's record may indicate the need for further investigation or action.

9.8.5 Recording and retention of low-level concerns

All low-level concerns must be recorded in writing, with the details of the concern, the context and the outcome.

Records will be stored securely and, where they do not meet the harm threshold, will typically be retained for as long as the staff member remains in APSoL's employment (or as advised by current safeguarding retention guidelines).

APSoL will regularly review any low-level concerns to detect potential patterns of concerning behaviour. Where a pattern is identified, will consider a referral to the LADO and/or the initiation of disciplinary proceedings.

9.8.6 Transparency and culture of openness

APSoL fosters a culture of honesty, openness and transparency. All staff should be aware that raising low-level concerns protects pupils from harm and helps maintain professional standards.

Staff who raise low-level concerns in good faith will not face reprisal. They will be supported.

If staff have any doubts or questions about whether an incident or behaviour constitutes a “low-level concern” or a more serious matter, they should consult the Headteacher / Principal immediately for guidance.

9.9 Allegations of Abuse Made Against Other Pupils

We recognise that young people are capable of abusing their peers. This occurs when a young person intentionally threatens, harms or causes distress to another young person. We also recognise that child-on-child sexual abuse can occur between two young people of any sex and/or age. Abuse will never be tolerated or passed off as “banter” or

“part of growing up” as this can lead to a culture of unacceptable behaviour and an unsafe environment. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under APSoL ’s Behaviour policy, and the Safeguarding and Child Protection 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 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)

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos. / Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

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

- The allegation will be recorded and the Headteacher / Principal (and DSL where appropriate) informed, the member of staff to whom the allegation was disclosed should not attempt to investigate.
- The DSL will contact the Multi Agency Safeguarding Hub and follow advice received, 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 young people involved (including the victim(s), the young people against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and young people mental health services (CYPMHS), if appropriate.

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can discuss any concerns or worries that they may have by speaking to a trusted adult (e.g. class teacher, form tutor, phase leader, head of year or a member of the senior leadership team. Or staff member chosen by the pupil)
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy.

Staff could refer to the Wirral Safeguarding Children Partnership concise summary of approaches to child-on-child abuse at via this link: WSCP 7-minute briefing

9.10 Sexual Violence and Sexting

Sexual violence and harassment may or may not happen simultaneously and can occur both on and offline. It can happen between individuals or groups of pupils and will not be tolerated in any form. Those with SEND or those who are identify as LGBTQ+ may be particularly susceptible to such behaviours.

Department for Education guidelines with regards to the management of sexual violence and harassment between young people at school can be found in the publication, Review of sexual abuse in schools and colleges - GOV.UK The guidance covers:

- what sexual violence and harassment is,
- schools' and colleges' legal responsibilities,
- a whole school approach to safeguarding and child protection. and
- how to respond to reports of sexual violence and sexual harassment.

All such incidents should be immediately reported to the DSL and managed in line with this policy. Victims of harm will be supported by APSoL's pastoral system.

There is a bespoke helpline for young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. The NSPCC helpline Report Abuse in Education can be contacted by phoning 0800 136 663 or by emailing help@nspcc.org.uk.

9.10.1 Harmful Sexual Behaviours (HSBs)

Harmful sexual behaviours refer to problematic, abusive and violent sexual behaviours which are developmentally inappropriate. HSBs exist on a progressive continuum starting with harmful sexual behaviour, which, if pupils are not supported, may develop into sexual harassment through to sexual violence occurring. School staff are aware of the importance of:

- Recognising the escalatory nature of misogyny and the benefits of early identification to support the minimising the risk of HSB to escalate into sexual harassment and sexual violence
- Taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they're consensual or non-consensual
- Acknowledging Sexual behaviour between young people with an age gap could be considered harmful.

For more information, see Harmful Sexual Behaviours.

9.10.2 Technology Assisted Harmful Sexual Behaviours (TA-HSB)

Technology-assisted harmful sexual behaviour (TA-HSB) refers to children or young people using digital devices to engage in sexual activity that is harmful, abusive, or developmentally inappropriate for them or others. It spans a wide spectrum, ranging from sharing self-produced images and sextortion to online grooming and the viewing of extreme pornography.

Types of TA-HSBTA-HSB involves both self-directed harms (such as inappropriate use of pornography or risky digital exploration) and behaviours that directly victimize or abuse others. Common examples include:

Image-Based Sexual Abuse (IBSA) / 'Revenge Pornography' - Non-consensual sharing or distribution of intimate, self-produced, or manipulated images.

Sextortion & Coercion – Forcing or pressuring someone to engage in sexual acts or send explicit materials by threatening to publish existing sexual content.

Grooming & Online Solicitation - Using the internet to befriend younger children or peers for the purpose of sexual exploitation.

Sexual Harassment & Bullying - Using online messaging, social media, or "deepfake" technology to degrade, embarrass, or sexually target individuals

Professionals typically evaluate these behaviours on a continuum of sexualised behaviour ranging from normal or developmentally appropriate exploration to abusive and violent acts. To identify whether a behaviour requires intervention, it is essential to consider:

Context - The level of coercion or the emotional distress of the victim. Developmental Stage - whether the action is appropriate for the chronological and developmental age of the youth. Consent & Power Dynamics - the presence of power imbalances, such as age gaps or the threat of reputational harm.

Centre of expertise on Child Sexual Abuse offers detailed research and definitions regarding how children engage in TA-HSB and best practices for safeguarding. Brook offer online free & confidential sexual health & wellbeing expert information and advice, there is a section for professionals which covers a range of resources and training, including the Traffic Light Tool - a framework to identify, understand and respond to sexual behaviours in children and young people up to 18 years old.

9.10.3 Sexting

This approach is based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

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, download or share 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.

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

9.10.4 Initial Review Meeting

Following a report of an incident, the DSL may hold an initial review meeting with appropriate school staff. 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 young people's social care.
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed).
- If further information is required to decide on the best response.
- Whether the imagery 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 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/carers of the pupils involved (in most cases parents should be involved).

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

- The incident involves an adult / someone in a position of trust
- 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 need).

- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts, underage pupils.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (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 Headteacher / Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

9.10.5 Further Review

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, hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. 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.

9.10.6 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.

9.10.7 Referring to the Police

If it is necessary to refer an incident to the police, this will be done through dialling **101** or through the Metropolitan Police website. If a pupil is deemed to be at risk of immediate harm, the police will be contacted dialling **999**.

9.10.8 Recording Incidents

All incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in **Section 13** of this policy also apply to recording incidents of sexting.

9.10.9 Curriculum Coverage

Pupils are taught about the issues surrounding digital harms as part of the curriculum. Teaching covers the following in relation

- What it is
- How it is most likely to be encountered
- The consequences of online harms
- 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

10. Parental Engagement

Where appropriate, we will discuss any concerns about a young person with the young person's parents. The DSL will normally do this in the event of a concerns or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If the school believes that notifying the parents would increase the risk to the young person, we will discuss this with Wandsworth Local Authority Children's Social Care Team via the Multi Agency Safeguarding Hub before doing so.

In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

11. Vulnerable pupils

The DSL will liaise with the Virtual School Head and local authority to promote educational outcomes for children with a social worker.

We will ensure that we hold information in relation to a child's looked after legal status and any contact arrangements. The designated teacher for looked after children will hold details of the child's social worker and the name of the Virtual School Headteacher in the authority that looks after the child alongside contact information for any key services working with the child.

We will ensure that key staff are aware of the potential vulnerability of children looked after, previously looked after children, all other children with an allocated social worker and those in kinship care arrangement. We will ensure that all staff have the skills, knowledge and understanding to keep these children safe.

We recognise the importance of all agencies working together and taking prompt action when necessary to safeguard looked after children, previously looked after children, all other children with an allocated social worker and those in kinship care as these children are a particularly vulnerable group.

11.1 SEN and Disability

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Staff will be mindful of these challenges and use their knowledge of individual pupils to identify potential concerns and escalate these concerns where appropriate to do so.

11.2 Working with the Virtual School

The role of the Virtual School Headteacher begins with the statutory duty to promote the educational achievement of children looked after, previously looked after children and children in kinship care.

We will liaise with the Virtual School Headteacher and members of the Virtual School team to ensure accelerated progress for Children looked after, previously looked after, all other children with an allocated social worker and those in kinship care. This includes working with schools, social care and wider partners to ensure that children looked after have high-quality Personal Education Plans, effective use of Pupil Premium Plus, strong attendance, stable education placements and access to the right support to make progress.

The school will be familiar with the Non-statutory guidance: Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension (Updated September 2025) which contains further information on the roles and responsibilities of Virtual School Heads and the support of children with a social worker or in a kinship care arrangement.

We will work alongside the Virtual School with the joint endeavour to improve the wellbeing and educational outcomes of this vulnerable group of children. Contact details for the Virtual School can be found in the key contacts on Page 3 of this document.

For previously looked after children, the Virtual School Headteacher provides information and advice to parents, carers, schools and other relevant professionals to help promote educational achievement and inclusion. The role has also been extended to champion the educational outcomes of children in kinship care, bringing greater visibility to their needs and supporting carers and schools to navigate key issues such as admissions, attendance, behaviour, exclusions and transitions.

Building on this statutory and extended role, the Virtual School Headteacher also provides strategic leadership for the education of children with a social worker. This is a system-wide responsibility focused on improving attendance, attainment and progress, strengthening the visibility of this cohort's needs, and ensuring that education is prioritised within child in need and child protection planning. For children with a social worker, responsibilities for the Virtual School Headteacher include:

- **Strategic champion for educational outcomes:** The Virtual School Head provides system-wide leadership to improve the **attendance, attainment and progress** of children with a social worker, making their needs and barriers more visible and promoting high aspirations across education and social care.
- **Strengthens partnership working:** The role brings together schools, social care, SEND, safeguarding and wider local authority services so that professionals share information effectively, include education in CIN/CP planning, and work collectively to reduce barriers such as poor attendance, exclusions and disrupted learning.
- **Advises and influences practice, rather than direct casework:** The Virtual School Head does **not** work directly with individual children or families; instead, they provide advice, guidance, training and challenge

to professionals so that evidence-based, trauma-informed and inclusive support is embedded across the system.

11.2.1 Care Leavers

The Virtual School has 3 dedicated Education Employment and Training Officers based within the leaving care service Future First. Their role is to provide targeted support for care leavers aged 18-21 years to enable them to secure positive EETs pathways

11.3 Children Looked After / Care Experienced Children

The Designated Teacher for Children Looked After / Care experienced children is APSoL this is a role required in law to work with local authorities to promote the educational achievement of looked after children and previously looked after. The Designated Teacher is required to undergo regular and appropriate training to carry out the role. See Statutory guidance: Designated teacher for looked-after and previously looked-after children 2018 for further information on the role and responsibilities of the designated teacher.

The Designated Teacher will be an active advocate for Children looked after and previously looked after. They will work with the Virtual School to discuss how Pupil Premium Grant funding held by the respective Virtual School Head may be best used to support the progress of looked after children in the school and meet the needs identified in the child's termly Personal Education Plan. All looked after children will have a Personal Education Plan (PEP) as part of the care plan that the local authority looking after the child has in place, this should be reviewed termly.

The Designated Teacher will also work with the Virtual School to promote the educational achievement of previously looked after children. The Designated Teacher will liaise with the Virtual School to support children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales (Children and Social Work Act 2017). The school will manage Pupil premium plus for previously looked after children.

The school will be familiar with the Statutory guidance: Promoting the education of looked-after and previously looked-after children (February 2018) which contains further information on the roles and responsibilities of Virtual School Heads and the support of looked after and previously looked after children.

The term 'looked after' refers to young people who are under 18 and have been provided with care and accommodation by family services. There are three main ways that young people and young people under eighteen years of age become looked after:

1. With parental agreement – this is under Section 20 of the Children's Act 1989: this may include short breaks.
2. Under a care order from a family court, Section 31 of the Children's Act 1989: when a care order is made, family services acquire parental responsibility and become a legal parent alongside the parent/guardian.
3. If a court orders the young person to be remanded into Local Authority accommodation.

Young people may only need to be looked after for a short period of time and then return to their family, but sometimes the arrangement is more permanent. An assessment of needs, which will include the views of the young person and the parents, will be carried out to determine the best course of action for the young person.

After the assessment of the young person and their circumstances has been completed, L.A Children's Services will agree with the family and young person the arrangements for their care.

They are set out in two documents: a care plan and a placement plan.

11.3.1 The Care Plan

A care plan is a structured document that summarises a person's health conditions, goals, treatments, and required interventions, helping caregivers and professionals deliver organised, consistent, care. It typically includes assessment data, expected outcomes and interventions. The care plan is reviewed on a regular basis through regular review meetings chaired by an Independent Reviewing Officer.

11.3.2 The Placement Plan

The placement plan sets out where and with whom the young person will live, looking at any specific arrangements about the placements including travel, and any restrictions that might be placed on the young person while placed with the foster carer for example people they cannot see. The placement plan is completed within five days of a young person being looked after.

11.3.3 Independent Reviewing Officer (IRO)

An Independent Reviewing Officer (IRO) oversees and reviews the care plans of children in care to ensure their welfare, rights, and voices are protected.

The role of the IRO is to:

- Chair the review meetings.
- Meet with the young person on their own to seek their wishes and feelings.
- Monitor the care the young person is receiving.
- Look to resolve any disputes about the review or the young person's care plan.

11.3.4 Looked After Children (LAC) Review Meetings

When a young person is looked after, their situation is regularly reviewed at Looked After Children (LAC) review meetings.
The purpose of these meetings is to:

- look at the young person's care plan,
- make sure that the right arrangements are in place for the young person whilst they are looked after,
- discuss any changes since the last review, and
- consider whether decisions made at the last meeting were acted on.

The first Looked After Children's Review meeting must be held within twenty-eight days of a young person being looked after. The second is held within the next three months and the third and later reviews are held every six months. LAC review meetings are chaired by an Independent Reviewing Officer (IRO).

The meetings are normally attended by:

- parents/others with parental responsibility for the young person
- the social worker
- the young person
- an advocate or independent visitor
- the foster carer
- the foster carer's supervising social worker
- other professionals may be there too, but it shouldn't be so many that it overwhelms the young person.

11.3.5 Safeguarding Children who are Looked After

Children may enter care for all sorts of reasons. But most enter because they have been abused or neglected. These experiences can leave young people with complex emotional and mental health needs. And this can increase their vulnerability to abuse.

Many young people also move repeatedly in and out of care, or between placements. This can prevent them from forming stable relationships with the adults who could help protect them.

11.3.6 What Works in Safeguarding Young People in Care

No two young people in care are the same. Each young person has their own characteristics and individual needs. But all young people need strong, caring and trusting relationships with those who care for them.

Through talking to looked after young people, the NSPCC has identified six ways the care for young people and the care system can be improved:

- ensure young people's voices are heard
- strengthen the social care work force and improving practice
- promote the right to advocacy
- improve emotional support
- support transitions in and out of care
- improve public understanding of the care system

11.4 Attendance

A child missing from an education setting is a potential indicator of abuse or neglect, including exploitation. Pupils with high levels of persistent absence are considered to be vulnerable. Local Authority guidance and procedures will be followed for dealing with a child who is missing from education, or unexplainable and or/persistent absences, particularly on repeated occasions or if a child suddenly stops attending. The school will follow the schools Missing Child Policy and procedures and adhere to the expectations outlined in the statutory guidance 'Working Together to improve School Attendance' (July 2026). For those children and families who have chronic poor attendance or persistent absenteeism, school will consider whether educational neglect is present and whether a referral to children's services is required, or whether the school should seek consent to access Family Help in order to coordinate a multi-agency plan of support for the child and family.

Attendance will be closely monitored at APSoL. In line with the school's attendance policy, contact will be made for any unexplained absences on the first morning of any absence. Follow up calls will then be made throughout the period of absence. In addition, the attendance of children with known welfare and attendance concerns will be monitored closely, particularly those with chronic poor attendance or persistent absentees, or if a child suddenly stops attending. Schools should also scrutinise the attendance of off-site provision to ensure children are attending and are safe. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, a child in need, are Children Looked After and/or SEN will be rigorously monitored on a daily and weekly basis. The child's social worker will be informed immediately when there are unexplained absences or attendance concerns. (change/add according to your own procedures)

It is important that the school's attendance team, including the Local Attendance Officer are aware of any safeguarding concerns. It is critical that when a child is not attending school their welfare is confirmed and expected practice would be for an appropriate professional to visit the home and speak to the child alone, particularly if there are any safeguarding concerns. The timing for this home visit will be determined on a case-by-case basis. The school will seek to ensure it has at least two emergency contacts for each family and consider what urgent action it may need to take when a vulnerable child and family are not contactable, and the child has not attended school. Where necessary, this may include reporting the child missing to the police. The school will ensure it is aware, in advance, of any difficulties in accessing the premises of a child's family home.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Children Missing Education (C.M.E.) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. All staff should be aware that children missing education, or those unexplainable and or/persistent absences, are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Children going missing, or unexplainable and or/persistent absences, can also be an indicator of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. When a child is deemed to be missing from education, or those unexplainable and or/persistent absences, school will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register. Once these enquiries have been undertaken, our school will follow the local protocol for Children Missing Education and make a C.M.E referral to the Local Authority Officer for C.M.E.

Some parents will decide to remove their child from the school role in order to educate them at home. For the majority of children, this choice will be with the child's best education at the heart of their decision, and it will be a positive

learning experience. However, this is not the case for all, and home education can mean that some children become less visible to services who are them to keep them safe and supported in line with their individual needs. Where a parent or carer has expressed their intention to remove their child from the school roll with a view to educating at home, the school will work together with other key professionals and will, where possible, attempt to facilitate a

meeting with the family to ensure that all parties have considered what is in the best interests of the child. This is particularly important for those children who have SEND, are vulnerable, and/or who have a social worker. The school will also link with the named officer for Elective Home Education within the Local Authority. Staff are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.

12. Complaints and Concerns about School Safeguarding Policies, Procedures and Practice

12.1 Complaints Against Staff

Complaints against staff that are likely to require a young person protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

12.2 Other Complaints

Parents and other complainants are encouraged to raise any safeguarding concerns or complaints directly with the DSL/Head Teacher so the matter can be resolved as quickly and informally as possible. To contact the DSL/Headteacher complainants should contact Tel: 0203 417 0905 or email: info@angloportugueseschool.org Complainants should simply request contact from the DSL.

We aim to acknowledge this initial contact within the next 24 hours and for an appointment to be made for a phone call or meeting with the DSL/Head Teacher to take place no later than five term time working days after APSoL's acknowledgment.

The DSL will take the concern or complaint seriously and seek to provide the necessary information. This might require an adjournment of the initial meeting or phone call so that further information can be gathered and then the meeting will be resumed or, if more convenient to the parent, the conversation may be completed with a phone call.

Meeting/conversation content will be logged by the DSL and recorded electronically, to indicate the nature of the concern/complaint, the steps that have been taken to provide a resolution, next steps and that the matter has been resolved, if this is the outcome.

If the matter cannot be resolved, the parents/complainants should follow APSoL's and Complaints Procedure (School website| Our School | Policies) so that the Principal is able to work to resolve the complaint. Parents or other complainants are usually expected to lodge the written complaint within three months of the expression of initial concern. Although this period will be extended if there are special circumstances.

The Principal will seek to:

- Establish the facts i.e. who is involved, what has happened and how has the complaint been addressed to date.
- Clarify the precise nature of the complaint and what is unresolved.
- Meet with the complainant to clarify what they feel needs to be done to resolve the issue(s).
- Interview those concerned to establish all points of view.
- Conduct interviews with an open mind and be prepared to persist in the questioning to ensure that the facts emerge.

- Keep a record of all interviews.

The Principal will be responsible for ensuring that a written report of their findings is made to the complainant and that a full record of any investigation, including the original written complaint and the written report is kept on file. This record is confidential to the parent, staff involved in the investigation and the Headteacher / Principal.

The Written Report will be accompanied by a letter that explains that if the parent does not feel that the matter has been resolved, a further meeting will be arranged with the Headteacher / Principal. This letter, containing the report, will be sent no later than 10 term time working days following the stage one meeting with the parents who lodged the complaint.

If the complaint still remains unresolved, the Chair of Governors investigate further as per our policy.

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

12.3 Whistleblowing

Staff receive specific training on how and when to raise safeguarding or professional conduct concerns, including to external bodies such as the NSPCC whistleblowing helpline by dialling **0800 028 0285** or emailing help@nspcc.org.uk. We will also refer to the Whistleblowing: Guidance for Employers and Code of Practice 2026 for further information APSoL has a whistle-blowing policy which can be viewed as a separate document – (School website | Our School | Policies) Advice is also available from the DfE in their guidance: Blowing the whistle to the Department for Education. (academy or post-16 provider.)

Whistle-blowing issues regarding the Principal should be raised with the Chair of Governors.

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

We have a clear reporting procedure for children, parents, and other people to report concerns or complaints, including abusive or poor practice (see section 12.2) We also acknowledge that Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures are in place for confidentially sharing and handling of low-level concerns.

13. Record-Keeping

All safeguarding and child protection records are held on the setting's electronic recording system – CPOMS

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS

The DSL will routinely analyse safeguarding records to identify trends, evaluate the impact of interventions, and inform next steps in cases and strategies to improve outcomes for children and young people.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely on CPOMS or secure cloud office files and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual young people will be retained until their 26th birthday. CPOMS ensures that pupil records are deleted after this date. The DSL will ensure that any hard copies of safeguarding documents are securely disposed of after this date.

Child protection files for transferring pupils will be securely passed to the receiving school within 5 working days of the transfer (in-year) or within the first 5 days of a new term. The DSL will consider which information in a child protection file should be shared with relevant staff and when it's appropriate to do so. Files will be transferred separately from the main pupil file, and confirmation of receipt will be obtained and stored. The DSL is responsible for ensuring timely and secure transfer to support continuity of care and safeguarding oversight. 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 young person.

Where information indicates a risk to others, (for example where a pupil has previously carried, threatened with or used a knife or weapon), the school, DSL and SLT will be responsible for assessing the risk and putting in place a support plan for when the child arrives. In addition:

- Appendix 2 sets out the policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- Appendix 3 sets out the policy on record-keeping with respect to allegations of abuse received against staff.

14. Staff Training & Continuing Professional Development (CPD)

14.1 All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand INSERT SETTING NAME's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the Wandsworth Safeguarding Children Partnership.

All staff will have regular training on the government's anti-radicalisation strategy. There is access to Government online Prevent Training via this link: Prevent Duty 2023 , through training offered by the Wandsworth Partnership and school-based training. We will ensure that all staff are enabled through the training offered to identify young people at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will receive training on online harms, including cybercrime (refers to criminal activity committed using computers and/or the internet), and harm indicators linked to children missing from education (CME). Staff will also receive regular safeguarding and child protection updates (for example, through emails, newsletters and staff meetings) as required, but at least annually.

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

14.2 The DSL and Deputies

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent Awareness Training and disseminate the information/training to all staff annually.

The DSL will consider regular audits of safeguarding records to monitor consistency, quality and impact. The DSL will also provide the governing body with regular reports summarising key data, trends, training compliance and any policy updates. APSOL will complete a Section 175 audit annual when completion is required by the Local Authority / Wandsworth Safeguarding Children Partnership.

14.3 Governors

All governors receive training on safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of Governors may be required to act as the 'case manager' if an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

14.4 Recruitment – Interview Panels

At least one person conducting any interview for a post at APSoL 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 2026, and Working Together to Safeguard Children (2026) and will be in line with Wandsworth Safeguarding Children Partnership procedures. Safer Recruitment Training can be accessed through the Wandsworth Professional Development Centre.

14.5 Staff who have Contact with Pupils and Families

Support / supervision will be considered for staff who have contact with young people and families in order to provide them with support, coaching and training, and to promote the interests of young people and allow for confidential discussions of sensitive issues. Working to ensure children and young people are protected from harm requires sound professional judgements to be made. It is demanding work that can be distressing and stressful. It is therefore essential that staff involved in this work have access to advice and a robust process of reflection/ supervision to help them reflect upon and review their work.

The school will have a framework for providing an opportunity to staff who are working directly with vulnerable young people, particularly those who are being managed on a child protection, child in need or team around the family plan, to have regular access to an appropriate manager to talk through and reflect on their involvement with the child's case.

15. Quality Assurance and Monitoring Arrangements

This policy will be reviewed **annually** by Senior Leadership Team. At every review, it will be approved by the full Governing Body, see dates below.

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.

We will complete an audit of the school's safeguarding arrangements annually, which will aim to illustrate how as a school we are fulfilling our statutory safeguarding responsibilities (Section 175) and will enable us to feedback any findings / learning into our safeguarding action plan. Findings if requested will be fed back to the Local Authority and the Wandsworth Safeguarding Partnership when requested. (NSPCC Self-Evaluation Tool & LA Professional Conversation Offer)

At intervals we will consider participating in a safeguarding review and will identify areas for development within school improvement plans as identified by the school leadership team and governing body.

The school's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in our safeguarding procedures without delay.

The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures. Additional updates to the Safeguarding policy and Procedures and Appendix will take place as and when needed.

Updated Policy Date:	Date Agreed by Governors	Scheduled review by SCHOOL
August 2026	6/10/2026 at Trust Board Meeting	July 2027

THE APPENDICES FOUND BELOW AND DETAILED IN THE CONTENTS LIST OF THIS POLICY ARE BASED ON THE DEPARTMENT FOR EDUCATION'S STATUTORY GUIDANCE:

Keeping Children Safe in Education 2026.

Appendix 1: Abuse Categories / Types of Harm

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others - particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, 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 ofline 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.**
  All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

- **Child protection**: is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or where significant harm is suggested.

- **Family Help:** means providing support as soon as a problem emerges, at any point in a child's life. KCSIE 2026 distinguishes between universal services and community-based early help, the targeted early help level of Family Help (sections 10 and 11 of the Children Act 2004), and statutory services. In Wandsworth this support is accessed through the Wandsworth Family Information Service or the Multi Agency Safeguarding Hub

- **Harm:** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another

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

  It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered when a parent fails to ensure a child is given an education.

  Neglect is the most common reason for a child to be the subject of a child Protection Plan in the UK and research from the NSPCC tells us that 1 in 7 secondary school age children and 1 in 20 children under 11 in the UK have been neglected at some point. Tackling child neglect has been identified as a previous priority for Wandsworth Safeguarding Children Partnership. The Wandsworth Safeguarding Partnership have developed a Practitioners Quick Guide to Neglect – Identification and Assessment . It should be noted that neglect can take a number of forms; **Educational, Emotional, Medical, Nutritional, Physical & Lack of Supervision** and is not always associated with deprivation. It may relate to other safeguarding concerns such as child sexual exploitation and radicalisation, where neglect could be a contributing factor. For more information on neglect follow this NSPCC link.

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. In line with KCSIE 2026, it may include verbal abuse, such as persistent criticism, belittling or name-calling. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age - or developmentally inappropriate expectations being imposed on children, including interactions beyond a child's developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

- **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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child

in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate ofline abuse. Sexual abuse is not solely perpetrated by adult males: women can also commit acts of sexual abuse, as can other children. **Most sexual abuse is committed by individuals known to the victim**. The sexual abuse of children by other children is a specific safeguarding issue in education, and all staff should be aware of it and of the school's policy and procedures for dealing with it (KCSIE 2026).

Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

We will record all information on the checks carried out in APSoL'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

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
- 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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with young people.

All offers of employment will be subject to the satisfactory completion of the employment checks and suitable references, reflecting legislative changes, specifically the Crime and Policing Act 2026.

Regulated activity means a person who will be:

- Any person volunteering in a role that involves teaching, training, instructing or supervising children frequently, overnight or more than 3 days in a 30-day period.
- Regulated activity includes providing advice or guidance on physical, emotional or educational wellbeing and driving a vehicle only for children

Existing Staff

If there are concerns about an existing member of staff's suitability to work with young people, APSoL will carry out all the relevant checks as if the individual was a new member of staff. This will also be done if an individual moves from a post that is not regulated activity to one that is.

A referral will be made to the DBS for anyone who has harmed, or poses a risk of harm, to a young person or vulnerable adult where the individual has engaged in relevant conduct, i.e. conduct that:

- endangers a child or is likely to endanger a child;
- if repeated against or in relation to a child would endanger the child or be likely to endanger the child;
- involves sexual material relating to children (including possession of such material);
- involves sexually explicit images depicting violence against human beings (including possession of such images); or
- is of a sexual nature involving a child.

- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a young person 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

Written notification will be obtained from any agency or third-party organisation that they have carried out the relevant checks that APSoL would perform on any individual who will be working at educational setting. In respect of an enhanced DBS check, APSoL will ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

Identification checks will be made. The person will be expected to produce their current DBS certificate and a form of identification in line with ID checking guidelines.

Contractors

APSoL will ensure that any contractor, or any employee of the contractor, who is to work at APSoL 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 young people

Where the contractor does not have opportunity for regular contact with children, the school will decide on whether a basic DBS check would be appropriate. If a person working at school is self-employed, we will either obtain the DBS check or request to see the certificate, to ensure the DBS check is at the level required.

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.

APSoL will ensure that our safeguarding requirements are set out in the contract between the contractor and APSoL

Trainee/Student Teachers

Where applicants for initial teacher training are employed, APSoL will ensure that all necessary checks are carried out.

For fee-funded trainee teachers, written confirmation from the training provider will be sought to ensure that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with young people. The trainee teacher will also be expected to produce their current DBS certificate and a form of identification.

Visitors

APSoL will have different types of visitors, those with a professional role i.e. educational psychologists, social workers etc., those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity in school such as a sports day.

APSoL will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteacher / Principal will exercise professional judgement about the need to escort or supervise visitors on site.

For visitors there in a professional capacity, APSoL will check ID and determine whether the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks in line with Wandsworth's Letter of Assurance.

Volunteers

- An enhanced DBS check with barred list information will be obtained for all volunteers who are working in regulated activity. A person will also be in regulated activity as a result of their work or volunteering, they: will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

The school will follow the requirements for DBS checks for volunteers in regulated activity, set out by the DfE.

APSoL will obtain an enhanced DBS check (with barred list information) for all volunteers who are working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly or provide personal care on a one-off basis.

Existing volunteers do not have to be re-checked if they have already had a DBS check (which should include children's barred list information if engaging in regulated activity). However, if APSoL has any concerns, it will consider obtaining a new DBS check at the level appropriate to the role.

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 (AP) provider, written confirmation from the provider will be obtained to ensure that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform, in line with the national standards for non-school Alternative Providers.

Adults who Supervise Pupils on Work Experience

When organising work experience, we will ensure that policies and procedures are in place to protect young people from harm. We will 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 person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight.
You must not allow someone on the barred list to take part in regulated activity.

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, APSoL will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Pupils Staying with Host Families

Where APSoL plans 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 APSoL organises 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.

Appendix 3: Allegations of Abuse Made Against Staff / Those in a position of trust

For employees, this Appendix should be read in conjunction with APSoL's Disciplinary Policy. This section of this policy is about managing cases of concerns/allegations that might indicate a person could pose a risk of harm if they continue to work in their present position, or in any capacity with children in school.

Reference is made to 'allegation/s' for ease. It applies to all cases in which it is alleged that a current member of staff, supply agency staff or volunteer has:

- Behaved in a way that has harmed a young person, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a young person or young people in a way that indicates he or she would pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates that he or she would not be suitable to work with children

It applies regardless of whether the alleged conduct/abuse took place in APSoL. If an allegation relates to conduct outside of school, this is referred to as 'transferable risk'. Allegations against any person who works with young people must be taken seriously. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff, supply staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a young person or other young people 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 APSoL so that the individual does not have direct contact with the young person or young people concerned.
- Providing an assistant to be present when the individual has contact with young people.
- Redeploying the individual to alternative work in APSoL so that they do not have unsupervised access to young people.
- Moving the young person or young people 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.

If suspension is required, the staff member will be suspended in accordance with APSoL's disciplinary policy and procedures.

If suspension is deemed appropriate, the employee will receive a named contact. Reasons for the suspension will be provided within one working day, but complete details may be unavailable to disclose due to the involvement of other authorities/agencies. The case manager and employee will agree the support to be in place during the investigation and communicate the expected timescales and likely course of action. If part of a trade union, the staff member must be advised to contact them. The employee's manager will be informed that they have been suspended whilst an investigation is completed, but no further details will be given.

Definitions for Outcomes of Allegation Investigations used in this Appendix

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately, the options open to APSoL depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

Procedure for Dealing with Allegations

In the event of an allegation meeting the criteria in the first paragraph of this Appendix above, the Headteacher / Principal (or Chair of Governors where the Headteacher / Principal is the subject of the allegation) – the 'case manager' – will take the following steps:

- Conduct basic enquiries to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, whether the individual was in APSoL at the time of the allegations; whether the individual did or could have come into contact with the child; whether there any witnesses; and whether there is any CCTV footage.
- Immediately discuss the allegation with the designated officer at the local authority (see contact information for LADO in the contact list of this policy).This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to young people or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with young people at APSoL is justified or whether alternative arrangements such as those

outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

- In relevant cases, inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies. Possible outcomes at this stage include:
    - **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at APSoL and their contact details
    - **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
    - **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action and investigation in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the young person/young people involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the young person/young people involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person.

If APSoL is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing body 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 APSoL's disciplinary process, should this be required at a later point.

Timescales

The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process.

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will usually be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will usually institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will normally hold this within 15 working days.
- In other cases, the first review should take place no later than four weeks after the initial assessment.

Specific Actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or children's social care services. The options will depend on the circumstances of the case, and the consideration should consider the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Conclusion of a case where the allegation is substantiated

If an allegation that an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child, is substantiated (including cases where the individual is dismissed or APSoL ceases to use their services, or the individual resigns or otherwise ceases to provide their services), a referral to the DBS must be made. The case manager may discuss this with APSoL's HR and the local authority's designated officer (LADO).

If the individual concerned is a member of teaching staff, the case manager must consider whether to refer the matter to the Teaching Regulation Agency. The school will consult the Public Sector Equality Duty (PSED) when considering a referral to the Teaching Regulation Agency when considering prohibiting the individual from teaching and may discuss this with the personnel adviser, HR support and/or local authority's designated officer.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager can access guidance to support the return to work from HR or the LADO as most people will benefit from help and support after a stressful experience.

The case manager will also consider how best to manage the individual's contact with the young person or young people who made the allegation, if they are still attending APSoL.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Headteacher / Principal, or other appropriate person in the case of an allegation against the Headteacher / Principal, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil. If the allegation is determined to be malicious the case manager and LADO should consider whether the young person who has made the allegation needs help or is at risk of abuse. In such circumstances, they may make a referral to social care.

Supply Workers

Supply teachers, whilst not employed by APSoL, are under the supervision, direction and control of the governing body or Headteacher / Principal when working in APSoL.

Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. APSoL will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are considered by APSoL during the investigation.

When using a supply agency, APSoL will inform the agency of its process for managing allegations but also take account of the agency's policies and the duty placed on agencies to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Confidentiality

APSoL 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 young person/young people 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).
- A copy provided to the person concerned where agreed by children's social care or the police.
- A declaration on whether the information will be referred to in any future reference.

If an allegation or concern is not found to have been malicious. APSoL will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other 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,*** the circumstances of the case will be reviewed with the local authority's designated officer (LADO) to determine whether there are any improvements that we can make to APSoL'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. How future investigations of a similar nature could be carried out without suspending the individual will be considered.
-

Appendix 4: Allegations Flowchart

ALLEGATIONS FLOWCHART (Staff & Volunteers who work with children)
STAGE ONE
Working Together to Safeguard Children 2026 requires employers to inform the LADO within one day of becoming aware of an allegation (paragraph 260 - 266 Page 112 & 113)
If you suspect a child is at risk of immediate harm, contact Wandsworth MASH and/or call the Police on 101
Employer to contact LADO for advice (LADO@Wandsworth.gov.uk / Anita Gibbons - 07974 586461) and / or complete the LADO referral form and send to the MASH team (mash@wandsworth.gov.uk / 0208 871 6622)
LADO will liaise with employer and police and make a decision on whether the concerns meet the threshold for formal LADO investigation.

If threshold is not met consultation will be closed at this time, LADO will record decision on consultation form and contact setting, ESL may be asked to make contact with the setting.
If threshold is met employer will be requested to complete the LADO referral form if this has not been completed previously.
LADO will record decision and return to employer for their records
STAGE TWO
LADO will convene a LADO management of allegations meeting within 5 working days
At this meeting the plan of investigation will be agreed taking into account any police investigation and safeguarding actions will be confirmed
Timeframe will be agreed and support to the employee will be confirmed
Employer to update LADO during the investigation
Employer to invoke disciplinary procedures if appropriate
STAGE THREE
LADO closure meeting held and will involve all appropriate professionals where the employer will present their findings / actions

OUTCOME TO THE LADO PROCESS AGREED BY ALL PROFESSIONALS				
Substantiated	**Unfounded**	**Unsubstantiated**	**Malicious**	**False Allegation**
There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm.	There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.	There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.	There is sufficient evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive.

CLOSURE MEETING WILL AGREE ON DBS REFERRAL IF APPROPRIATE AND CLOSURE LETTER TO EMPLOYEE.
See LADO Procedures using link on the Wandsworth Family Information Service LADO page.

Appendix 5: Specific Safeguarding Issues

Children Missing from Education (CME)

A young person going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or young person criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. *All* unexplained absences are a safeguarding concern and will be investigated as part of a supportive approach through APSoL's Attendance Review Framework.

There are many circumstances where a young person may become missing from education, but some young people are particularly at risk. These include young people who:

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

We will follow our procedures for unauthorised absence and for dealing with young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. APSoL will send a text to emergency contacts by 09.30am if a pupil does not attend without a reason being provided. At least two emergency contacts held for all pupils where possible.

We will inform the local authority (in Wandsworth, the Education Welfare Service) if young person leaves APSoL without a new school being named and adhering to requirements regarding sharing information with the local authority, when removing a young person's name from the admission register at non-standard transition points where applicable. Pupils can only be deregistered under the 15 grounds set out in as set out in Regulation 9 of the School Attendance (Pupil Registration) (England) Regulations 2024, as follows:

9. *—The proprietor of a school must ensure that the name of a pupil of compulsory school age is deleted from the school's admission register when—*

1.(a)the pupil has been registered at another school, unless—

(i) a school attendance order naming the school is in force in relation to the pupil;

(ii) the pupil is a mobile child and the school is their main school; or

(iii) the proprietor has agreed with a person with control of the pupil's attendance at the other school, or is such a person and has decided, that the pupil should be registered at more than one school;

2.(b)the pupil was admitted to the school for nursery education and—

(i) they have completed such education and would, if they continued attending the school, be transferred to a reception, or more senior, class at the school; but

(ii) the proprietor does not have reasonable grounds to believe that the pupil will attend the school again;

3.(c)the pupil is also registered as a pupil at one or more other schools and—

(i) the proprietor does not have reasonable grounds to believe that the pupil will attend the school again;

(ii) the proprietor of each other school where the pupil is registered has consented to the deletion;

(iii) there is no school attendance order naming the school in force in relation to the pupil; and

(iv) the pupil is not a mobile child or, if they are, the school is not their main school;

4.(d)a school attendance order relating to the pupil and formerly naming the school has been amended by the relevant local authority to substitute the name of the school with that of another school;

5.(e)a school attendance order relating to the pupil and naming the school has been revoked by the relevant local authority on the ground that arrangements have been made for the pupil to receive suitable education otherwise than at school;

6.(f)a parent of the pupil has told the proprietor in writing that the pupil will no longer attend the school after a certain day and will receive education otherwise than at school and—

(i) that day has passed; and

(ii) there is no school attendance order naming the school in force in relation to the pupil;

7.(g)the pupil no longer normally lives a reasonable distance from the school and—

(i) the proprietor does not have reasonable grounds to believe that the pupil will attend the school again; and

(ii) the pupil is not a boarder;

8.(h)the pupil has been given leave of absence and—

(i) the pupil has not attended the school within the ten school days immediately after the end of the period of leave;

(ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or an unavoidable cause; and

(iii) the proprietor and the local authority have jointly made reasonable efforts to find out the pupil's location and circumstances but—

(aa)they have not succeeded; or

(bb)they have succeeded and they agree that there are no reasonable grounds to believe that the pupil will attend the school again, taking into account any reasonable steps they could take (either jointly or separately) to secure the pupil's attendance;

9.(i)the pupil has been continuously absent from the school for at least twenty school days and—

(i) none of the circumstances mentioned in Table 2 in regulation 10(3) or in any row of Table 3 in regulation 10(4) other than the final three rows applied to the pupil at any point during that period;

(ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or an unavoidable cause; and

(iii) the proprietor and the local authority have jointly made reasonable efforts to find out the pupil's location and circumstances but—

(aa)they have not succeeded; or

(bb)they have succeeded and they agree that there are no reasonable grounds to believe that the pupil will attend the school again, taking into account any reasonable steps they could take (either jointly or separately) to secure the pupil's attendance;

10.(j)the pupil is detained under a sentence of detention and the proprietor does not have reasonable grounds to believe that the pupil will attend the school after they cease to be detained under that sentence;

11.(k)the pupil has died;

12.(l)the pupil will be over compulsory school age by the next time the school meets and—

(i) the proprietor does not have reasonable grounds to believe that the pupil will attend the school again; or

(ii) the pupil does not meet the academic entry requirements to be transferred to the school's sixth form;

13.(m)the pupil is a boarder at the school and—

(i) the school is a school maintained by a local authority or is an Academy;

(ii) charges for the pupil's board and lodging are payable by a parent of the pupil; and

(iii) those charges remain unpaid by the parent at the end of the school term to which they relate;

14.(n)the pupil has ceased to be a pupil at the school and the school is not—

(i) a school maintained by a local authority; or

(ii) an Academy; or

15.(o)the pupil has been permanently excluded from the school

The Attendance Officer will hold a list of pupils for whom there are known safeguarding issues. The DSL will be made aware of these pupils' absence as soon as possible in order to take any safeguarding steps which may be needed.

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

If a staff member suspects that a young person is suffering from harm or neglect, we will follow child protection procedures as outlined in this policy, including with respect to making reasonable enquiries. We will make an immediate referral to the Multi Agency Safeguarding Hub, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.

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

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

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

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

Missing Child Procedure

Purpose

It is essential that the necessary steps are taken to safeguard and promote the welfare of all young people, and this is seen as an utmost priority. Any young person going missing from a class is a safeguarding issue.

The procedure will be followed alongside the Child Protection and Safeguarding Policy and any other relevant school policy or procedure.

All staff must understand what to do in the event that a young person were to be lost or go missing either from APSoL building, site or during an off-site visit.

It is the responsibility of the DSL and Principal to ensure that these procedures are understood and followed.

It is the responsibility of all staff to read these procedures and to act at all times accordingly.

Introduction

The procedures have been adopted in respect of any young person who goes missing from the premises or wanders off from our care, even if they remain on site. The procedures will be used in respect of all cases in which it is found that a young person is lost or missing. The policy enables a child missing situation to be dealt promptly and professionally in a "worst case scenario" of a missing young person. It emphasises the responsibility for attendance, registers and keeping young people safe.

Due consideration will be given by the DSL as to whether a referral to the Multi Agency Safeguarding Hub is required. For example, where the young person needs protection, family help or in need of other support.

Staff are responsible for completing the attendance registers, including at after school clubs and activities. The register must be completed accurately and promptly. The law requires schools to have an attendance register taken both in morning and afternoon sessions.

Steps to Keep Young People Safe

All procedures will be managed with common sense and sound judgement. For pupils in Years 7-11 we must only release young people into the care of individuals who have been notified to us by the parent/carer(s) in advance, and we must ensure that young people do not leave the premises unsupervised. We must take all reasonable steps to prevent unauthorised persons entering the premises and have an agreed procedure for checking the identity of visitors. At all times, parents can be assured that all young people remain within the safe environment of our school/setting, including attendance at any outings. We ensure that proper precautions are taken to prevent young people going missing.

If any young person is found to leave the premises without permission of APSoL and parents, they will be deemed to have broken APSoL's code of conduct, and the application of appropriate and proportionate sanctions will be considered by the Headteacher / Principal accordingly.

It is the responsibility of parents to ensure they provide correct and updated information on a timely basis and know the procedures for handover of their young person.

Particular care will be taken to formally register all young people on the school attendance system at the start of every lesson. As a minimum, any unexplained absences will be reported immediately to the DSL and school attendance officer by the teacher so that swift and immediate action will be taken. This should be done via email.

In the absence or unavailability of the DSL, the deputy DSLs will assume these responsibilities. On the rare occasion of the DSL and the deputies all being unavailable, any other member of the senior leadership team will assume responsibility for these procedures. In the case of incidents occurring while young people are learning outside the classroom on school visits, the visit leader will assume such responsibility, as agreed with the Educational Visits Coordinator on behalf of the DSL and Headteacher / Principal.

As soon as a pupil is reported missing from a lesson, a search of APSoL premises will be undertaken.

This search will be co-ordinated by the DSL supported by staff in APSoL office and any other member of staff available at the time. The search of all of the obvious places – including toilets, empty rooms and APSoL grounds – should take no more than 15 minutes.

If the pupil has not been found, parents will be contacted. They will be advised of what has happened and will be asked to try to contact their child by calling her mobile number (where applicable). If after a further 15 minutes, there has been no contact with the young person and they are not found, the DSL will dial the police on **101**. If there is reason to suspect that the young person is at risk of harm or in immediate danger, the police emergency number (**999**) will be dialled.

The information required by the police to assist in locating and returning the pupil to a safe environment is as follows:

- The pupils name(s); date of birth; status (for example, CLA); responsible authority
- Where and when they went missing
- Previous missing episodes (if any) and where they went
- Who, if anyone, they went missing with
- What the young person was wearing plus any belongings they had with them such as bags, phone (include mobile number)
- Description and recent photo
- Medical history, if relevant
- Time and location last seen
- Circumstances or events around going missing with relevant safeguarding information
- Details of family, friends and associates

Whilst the search is ongoing, APSoL will continue to liaise with the police and act in accordance with police instructions.

Option 1 – if the young person is found before the police have arrived then the police must be informed and procedures need to be followed.

Option 2 - if the young person returns to school of their own volition, then the police must be informed, and procedures need to be followed.

Option 3 - if the police locate the young person and bring them back to APSoL the police will conduct the safe and well interview and APSoL will follow school procedure.

Where a pupil has a known risk of being missing, a risk assessment for the pupil will be written and put in place.

Visitors are recorded upon arrival and departure of APSoL site and follow the signing in procedure. Any pupil who needs to sign out for an appointment out of school must provide a letter from home requesting the time out and this absence be recorded appropriately and sanctioned by a Head of Year/SLT. Evidence of the medical appointment should also be provided.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. 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 (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

CCE can include young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE - young people who

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

CCE can be committed or facilitated by an organised network, and that the victim may identify as being part of this group. This could constitute modern slavery, and that a modern slavery referral should be completed where a potential victim is identified. Victims aren't always recognised and can be criminalised for actions they take while under coercion, and that's a significant concern.

Further information, useful links and resources can be found here:

Wandsworth Safeguarding Children Partnership – Exploitation Resources
Child Exploitation and Online Protection Centre (CEOP)
The Children's Society – County Lines and Child Exploitation
The Children's Society County Lines Tool Kit
Wirral Safeguarding Children Partnership – Child Exploitation

Child Sexual Exploitation (CSE)

CSE is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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 (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and young people or adults. Most sexual abuse is committed by those previously known to the victim The abuse can be a one-off occurrence or a series of

incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Multi Agency Safeguarding Hub and the police, if appropriate. Indicators of sexual exploitation can include a young person:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Further information, useful links and resources can be found here:

Wandsworth Safeguarding Children Partnership – Exploitation Resources
Child Exploitation and Online Protection Centre (CEOP)
The Children's Society – Child Sexual Exploitation
Wirral Safeguarding Children Partnership – Child Exploitation

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include:

• increased absence from school or college,
• a change in friendships or relationships with older individuals or groups,
• a significant decline in educational performance,
• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
• unexplained gifts or new possessions

They could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

• being male
• having been suspended, spent time in Alternative Provision or permanently excluded from school
• having experienced child maltreatment
• having been involved in offending, such as theft or robbery
• having used drugs or alcohol in early adolescence, and
• having previously been a victim or previously perpetrated violence

A comprehensive list of risk factors can be found in the Home Office's Serious Violence Strategy.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (DSL) or deputy. The DSL or deputy will:

- Assess the risk to the individual pupil and others in the school, considering wider information or concerns
- Put in place a safety and support plan depending on the risk
- Consider actions to de-escalate peer conflict where relevant

Staff need a keen awareness that violence can often peak in the **hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places**. Further advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. Practical guidance for schools and colleges and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence via The Youth Endowment Fund.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as COUNTY LINES gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

County Lines

'County Lines' is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting young people and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine, crack cocaine and Ketamine are the most common drugs being supplied and ordered. In most instances, the users or customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target young people and adults – often with mental health or addiction problems – to act as drug runners or move cash so they can stay under the radar of law enforcement. In some cases, the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing. Dealers will also create drug debts in order to control the young person with the fear that they or their family will be subject to violence if the debt is not worked off

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. As we have seen in child sexual exploitation, young people often don't see themselves as victims or realise they have been groomed to get involved in criminality. It important that APSoL plays part to understand county lines and speak out if we have concerns.

Signs that suggest involvement in county lines:

- Frequently missing from school or home / Travelling alone to places far away from home / not attending education
- Suddenly have lots of money / lots of new clothes / new mobile phone / Receiving more calls or texts than usual / Carrying or selling drugs / Carrying weapons or know people that have access to weapons
- Relationships with or hanging out with someone/people that are older and controlling
- May have unexplained injuries / seem scared very reserved or seem like they have something to hide / self-harm

Signs that county lines are happening in a specific area can include:

- Change in residents' mood and / or demeanour (e.g. secretive / withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia / Changes in the way young people might now dress
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc.) / Residents or young people you know going missing, maybe for long periods of time
- Young people seen in different cars / taxis driven by unknown adults / seeming unfamiliar with your community or where they are. / Truancy, exclusion, disengagement from school / different accents compared to local accent)
- An increase in anti-social behaviour in the community / Unexplained injuries

Further Details can be found here:

Wandsworth Safeguarding Children Partnership – Exploitation Resources
The Children's Society – County Lines and Child Exploitation
The Children's Society County Lines Tool Kit
Wirral Safeguarding Children Partnership – County Lines and Criminal Exploitation.

Action will be taken if county lines is suspected. INSERT SETTING NAME will report any concerns to the police by dialling 101, or in an emergency 999. Concerns may also be reported by calling Crimestoppers on 0800 555 111. Any concerns linked to the railways will be reported to the British Transport Police by texting 61016 or by dialling 999 in an emergency. The DSL may choose to involve Catch 22, to ensure that young people who have become involved in county lines are able to access specialist support and avoid further involvement in situations that they find difficult to get themselves out of. The DSL may make a referral to the Multi Agency Safeguarding Hub if it is suspected that a young person is at risk of harm.

Contextual Safeguarding, Harm outside the home (HOTH) and Extra-Familial Harm

Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm outside of their families, including within peer groups, local neighbourhoods and online environments.

Traditional child protection models have tended to focus on risks within the home, typically involving parents, carers or other trusted adults. However, this does not account for the considerable amount of time young people spend in social settings beyond their family, where peer influence, unsupervised environments and online platforms may pose significant risks to their safety, wellbeing and development.

Harm outside the home (HOTH) recognises that a child's environment and social context, including their peer network, community and wider societal influences can shape their behaviours, experiences and vulnerability. Consequently, it seeks to identify and respond to harm occurring in these domains and to address the systems, norms and settings that allow such harm to occur. This includes altering unsafe environments as well as supporting the individual child.

Research has shown that young people are often influenced as much by social dynamics and external factors as by family relationships. APSoL therefore considers these broader influences when assessing safeguarding risk and designing interventions. HOTH encompasses a range of extra-familial harms, including (but not limited to):

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

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

The DSL will:

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

Modern Slavery and Human Trafficking

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. The definition of human trafficking is:

(a) "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude or the removal of organs.

(b) The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.

(c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in sub-paragraph (a) of this article. "Child" shall mean any person under eighteen years of age.

Children trafficked into the country may be registered at a school for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools which are situated near ports of entry, but practitioners should be alert to this possibility in all schools. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from school.

If a member of the school staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority children's social care are contacted immediately. The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. To access support, please refer to the National Referral Mechanism guidance.

Lesbian, Gay, Bisexual and Transgender (LGBTQ+) and Social Transition Pupils

APSoL believes that respect is a fundamental right and responsibility for all. It is the duty of all employees to ensure that every member of APSoL community feels valued, irrespective of their sexual/gender orientation, race or religion.

Diversity is celebrated and valued and APSoL will endeavour to ensure that LGBT pupils have a trusted adult with whom they can be open. Children may at any time question their gender identify or express that they are not the sex biologically assigned to them. Young children go through a period of questioning their gender, but for the majority this will not continue into adulthood.

APSoL is aware of the potential vulnerabilities of these children (e.g. the possibility of complex mental health and psychosocial needs, for example relating to relationships with family and peers) and adopts policies that maintain flexibility and takes a strong, proactive stand against all forms of bullying.

Staff will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious. The school will work with a child and their family to support them on their journey and to put in place a bespoke package which allows them to take appropriate steps forward. A child may be in a vulnerable state as they try to navigate their feelings. It is also important to understand that parents and family may also struggle to come to terms with the wishes and intentions of their children.

The school will actively involve parents/carers where a child who is questioning their gender asks for support, unless there are circumstances where doing this would constitute a greater risk to the child than not involving them.

Where a child or their parent/carer has raised a request relating to social transition, the school will:

- Consider the best way to support the child and take the necessary steps when a child requests support
- Document decision-making processes and keep records, ensuring compliance with safeguarding legislation and equality and human rights law
- Ensure any assessment is informed and evaluated with the of the welfare and best interests of the child and other children.

See paragraphs 262-265 and 278-282 in KCSIE for more detail on reviewing previous decisions, recording correct information, children 'living in stealth' and supporting children who wish to detransition (282) Safeguarding requirements relating to school premises and single sex sport can be found here: KCSIE 2026

APSoL will endeavour to support families during this time, but the welfare and safety of the pupil will always come first.

Staff should **not** adopt any changes relating to social transition unless a decision has been made by SLT/DSL and the child's parents/carers have been involved. In addition to caring for the welfare of children, we will ensure that the legal rights of children are observed under the Equality Act 2010 and associated legislation.

Domestic Abuse

The cross-government definition of domestic violence and 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 young people 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 young people. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. All staff will be alert to the signs of domestic abuse and will report this to the DSL.

APSoL recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. We also recognise children who witness domestic abuse **are victims**, that witnessing domestic abuse can have a lasting impact on children, and that children can be victims in their own relationships too. They may feel helpless, humiliated and may blame themselves. School may be the only stable, secure and predictable element in their lives. Members of staff in safeguarding / pastoral roles have awareness of the DfE's guidance on domestic abuse: https://www.gov.uk/guidance/domestic-abuse-how-to-get-help and guidance published by the Wandsworth Safeguarding Partnership: Domestic Abuse

Operation Encompass and Police Notifications (Operation Encompass Website)

INSERT SETTING NAME is part of Operation Encompass, a national initiative that ensures schools are notified by the police before the start of the next school day when a pupil has been involved in, or exposed to, a domestic abuse incident in the home.

This information sharing enables APSoL to provide timely, appropriate pastoral support to affected children and their families.

Key Features:

- Operation Encompass notifications are received by the Designated Safeguarding Lead (DSL), who is trained in receiving and handling the information confidentially.
- The DSL ensures that appropriate support is offered to the child discreetly and sensitively on the same day.
- No direct disclosure is made to the child unless deemed appropriate by the DSL, in consultation with relevant agencies.

In addition to domestic abuse incidents, schools may also be notified via police reports if:

- A pupil has been reported missing or absent in circumstances that give rise to concern
- A pupil has been arrested or involved in a criminal incident
- A welfare concern is identified through police attendance at a property

Where such information is shared:

- The DSL will assess whether the incident meets the threshold for Family Help or Children's Social Care referral.
- The incident will be recorded securely with due regard for confidentiality and data protection.
- Parents will be contacted where appropriate, in line with advice from the police or safeguarding partners.

We recognise that timely information sharing with schools by the police can play a critical role in identifying risk, reducing harm and ensuring a coordinated safeguarding response. INSERT SETTING NAME works in close partnership with Safer Neighbourhood Teams, SWBCU (South West Basic Command Unit) of the Metropolitan Police, Wandsworth Safeguarding Children Partnership and other relevant agencies to ensure the best outcomes for children.

Private Fostering

Private fostering is when a young person or young person under 16 years old (or under 18 if disabled) lives with someone for 28 days or more by private arrangement (without the involvement of a local authority) with someone who is not a:

- Parent or close relative (brother, sister, aunt, uncle, grandparent or step-parent)
- guardian or a person with parental responsibility

Private foster carers might be:

- friends of the young person's family
- someone willing to care for the young person of a family they don't know; or relatives not mentioned in the list above, for example a cousin or great aunt

Examples of private foster care arrangements:

- young people sent to this country for education or health care by parents or guardians living overseas
- teenagers living with a friend's family as a result of problems at home
- young people on holiday exchanges
- young people whose parents' study or work involves unsociable hours, which make it difficult for them to use ordinary day care or after school care

Reporting an arrangement:

- All private fostering arrangements will be reported to LA Children's Services through the Multi Agency Safeguarding Hub by phoning **020 8871 6622**. Contact can also be made with the Private Fostering Team a range of resources and information can be found on the website age.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL (and any deputies) should make any referrals to the Wandsworth Council Local Housing Authority so they can raise/progress concerns at the earliest opportunity. This can be done by completing the online form. 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 LA Children's Services via the Multi Agency Safeguarding Hub where a young person has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty 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 Homeless Reduction Act Factsheet usefully Information in relation to The Homeless Reduction Act and the legal duty to provide homelessness service can be found on the following Wandsworth LA webpage .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.

In most cases school and college staff will be considering homelessness in the context of young people who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the young person's circumstances.

Family Members in Prison

Young people and children who have experienced or are experiencing parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. The school understands the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability, this is often relevant for those who are living with any close family member who is in prison. INSERT SETTING NAME will work with agencies and resources such as: NICCO , Children Heard & Seen , PACT to help mitigate negative consequences for those young people.

Young People and the Court System

Young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides**,** published by HM Courts and Tribunals service, to support young people aged 5-11 years and 12-17 years**.** The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making young person arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for young people. To support, there is an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Alienating Behaviours

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

Theterm 'Alienating Behaviours' is therefore used to describehowoneparent or carerundertakesand/ or expresses an ongoing pattern of negative attitudes and communication about the other parent or carer that have the potential or intention to undermine, manipulate or even destroy a child's relationship with the other parent or carer. Alienating behaviours range in intensity, duration and their impact on children.

Alienating Behaviours can be emotionally and psychologically abusive and can have long lasting impact on the wellbeing of a child and their relationship with both parents. Some alienating behaviours that may be observed include:

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

More information can be found on CAFCASS website and Coached Children – Understanding the impact of parental alienation. See Article - New Guidance on 'parental alienation' in family court battles

'Honour-Based' Abuse (including Female Genital Mutilation (FGM) and Forced Marriage)

'Honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If staff have a concern, they will record their concerns and speak to the DSL, who will make a referral to the Multi Agency Safeguarding Hub.

Female Genital Mutilation (FGM) and Breast Ironing

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

FGM & Breast Ironing Information

Female Genital Mutilation (FGM) involves cutting and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation. The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out below.

Breast ironing (also known as breast flattening) is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or to disappear. Usually carried out by mothers on their daughters to protect them from rape and sexual harassment. In certain African cultures, men believe that as soon as a girl has breasts, she is ready to have sexual relationships. There have been incidents of this happening in the UK, you may notice an unwillingness to get changed for PE, pain when moving or a flattened breast area.

Female Genital Mutilation (FGM)

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal. Professionals have a mandatory duty to report such offences to the police.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under the age of 18 years must immediately report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate. (As outlined in Section 5B(11) of the FGM Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) the definition for the term 'teacher': ""teacher" means – (a) in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England); (b) in relation to Wales, a person who falls within a category listed in the table in paragraph 1 of Schedule 2 to the Education (Wales) Act 2014 (anaw 5) (categories of registration for purposes of Part 2 of that Act) or any other person employed or engaged as a teacher at a school (within the meaning of the Education Act 1996) in Wales" – source Mandatory Reporting of Female Genital Mutilation – Home Office)

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

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils. Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM, must speak to the DSL and follow local safeguarding procedures.

Referral to L.A. Children's Services

If any agency becomes aware of a young person who may have been subjected to or is at risk of FGM they must make a referral to Children's Specialist Services by contacting the **Multi Agency Safeguarding Hub (020 8871 6622 / mash@wandsworth.gov.uk).**

All professionals need to consider whether any other indicators exist that FGM may have or has already taken place, for example:

- Preparations are being made to take a long holiday - arranging vaccinations or planning an absence from school.
- The young person has changed in behaviour after a prolonged absence from school.
- The young person has health problems, particularly bladder or menstrual problems.

There may be older women in the family who have already had the procedure, and this may prompt concern as to the potential risk of harm to other female young people in the same family. Younger female siblings must also be considered. Any girl withdrawn from PSHE may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

On receipt of a referral, a strategy meeting must be convened as soon as practicable (and in any case within two working days), and should involve representatives from the police, Children's Specialist Services, education professionals, and health services.

The **Strategy Meeting** must first establish whether the parents or girl has had access to information about the harmful aspects of FGM and the law in the UK. If not, they should be given appropriate information regarding the law and harmful consequences of FGM.

Where a girl has already undergone FGM, a second strategy meeting should take place within ten working days of the referral. This meeting must evaluate the information collected in the enquiry and recommend whether a child

protection conference is necessary to make a decision about whether the girl continues to be suffering or likely to suffer significant harm and needs further protection, and possibly to agree a child protection plan. A girl who has already undergone FGM should not normally be subject to a child protection conference or be included on the child protection register unless additional child protection concerns exist. However, she should be offered counselling and medical help, and consideration should be given to any other female siblings at risk. Children's Specialist Services will liaise with the Paediatric services where it is believed that FGM has already taken place to ensure that a **Medical Assessment** takes place in line with supporting pupils at school with medical conditions.

It should be remembered that this is a one-off act of abuse to a young person, although it will have lifelong consequences, and can be highly dangerous at the time of the procedure and directly afterwards.

Liaison with Metropolitan Police

Children's Specialist Services will refer the matter to Metropolitan Police who will participate in the investigation and consult with the Forensic Medical Examiner.

Assessment

Children's Specialist Services in consultation with the Police will undertake a Section 47 Enquiry if it has reason to believe that a young person is likely to suffer or has suffered FGM.

Where a young person has been identified as suffering or likely to suffer significant harm, it may not always be appropriate to remove the young person from an otherwise loving family environment. Parents and carers may genuinely believe that it is in the girl's best interest to conform to their prevailing custom. The preferred outcome for the young person is that the family agree to halt the process. Therefore, the main emphasis of work in cases of actual or threatened FGM should be through education and persuasion.

Where a young person appears to be in immediate danger of mutilation, legal advice should be sought and consideration should be given, for example, to seeking an Emergency Protection Order or a Prohibited Steps Order, making it clear to the family that they will be breaking the law if they arrange for the young person to have the procedure.

Indicators of FGM

Indicators that **FGM has already occurred** include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period

- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced Marriage

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

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

If a member of staff suspects that a pupil is being forced into marriage, they will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the Multi Agency Safeguarding Hub.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk.
- Ensure that the pupil has a single point of contact in school who they can talk to, and refer for support from external agencies as necessary.

For further information see:

Government Guidance - Forced Marriage

The Right to Choose – Government Guidance on Forced Marriage

The Right to Choose – February 2023 (easy read version)

Karma Nirvana - A specialist Charity for victims and survivors of Honour Based Abuse

Freedom Charity - A UK-based charity formed to give support to victims of forced marriage and violence upon women thought to have brought dishonour on their family.

Faith Based Abuse

Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'

When this type of abuse is suspected staff should make a referral to the MASH for support and guidance. Further information can be found on Child Abuse Linked to Faith or Abuse (CALFB) through the National FGM Centre.

A range of leaflets and information in relation to Harmful Practices (including FGM, 'so called' Honour Based Abuse and Forced Marriage) can be found on the Savera UK Learning Hub. Please also access further information by using the link to FORWARD, KARMA NIRVANA. ASIAN WOMENS RESOURCE CENTRE. IKWRO Women's Right Organisation

Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent 'susceptible' people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. The education sector has a duty to prevent young people from being drawn into terrorism. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist

group may appear to provide an answer. The internet and the use of social media have both become major factors in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify young people at risk.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. The government website Educate Against Hate and charity NSPCC identify signs that a pupil is being radicalised can include:

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

Young people who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that the signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong or if they are unsure.

If staff are concerned about a pupil, they will follow the safeguarding procedures set out in this policy, including recording their concerns and discussing their concerns with the DSL. Staff should **always** act if they are worried. If a young person is not suffering or likely to suffer from harm, or in immediate danger, where possible first speak to the DSL to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should speak to a deputy DSL or a member of the senior leadership team if no DSL or deputy DSL is available, advice should be sought from the Wandsworth Muti Agency Safeguarding Hub.

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 Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team via the Multi Agency Safeguarding Hub. The

Department for Education 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 or may be planning to travel to join an extremist group
- See, hear or are told something that may be terrorist related.

From 1 July 2015 all schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 ('The CTSA 2015') Schools must have regard to statutory PREVENT GUIDANCE issued under section 29 of the CTSA 2015 and the Contest Strategy 2023. Within the Prevent Duty Guidance March 2024, Section 3: Compliance with the Prevent Duty (Paragraphs 57-87) outlines the specific responsibilities of a wide range of public-facing bodies, this includes School's responsibility in preventing people from being drawn into terrorism. This duty is known as the Prevent duty. Required responsibilities are summarised under the following three themes:

- Leadership and partnership
- Capabilities (Training and Induction, Risk Assessments)
- Reducing Permissive Environments (Building Resilience through the curriculum, IT Policies, External Speakers and Events)

Within The prevent Duty Guidance March 2024 Section 5: Sector Specific Guidance, paragraphs 141 – 145 summarises further signposting for schools linking to their responsibilities.

Schools are expected to **assess the risk** of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. **It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty**. The Prevent duty builds on **existing local partnership arrangements**. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Wandsworth Safeguarding Children Partnership (WSCP). There will be suitable internet filtering is in place to equip pupils with the necessary skills to stay safe online at school and at home.

Bev Thomas is the Hate Crime & Prevent Coordinator for Wandsworth:
bev.thomas@richmondandwandsworth.gov.uk ,

All assessments are to be carried out via MASH using the NRF (National Referral Form)and the Referral route via MASH. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales.

The Prevent guidance refers to the importance of Prevent **awareness training** to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. ***As a minimum, however, schools should ensure that the designated safeguarding lead and deputies***

undertakes regular Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Children at risk of radicalisation - WSCP

Schools must ensure that children are safe from terrorist and extremist material when **accessing the internet** in schools. Schools should ensure that suitable monitoring and filtering is in place and regularly reviewed. It is also important that schools teach pupils about online safety more generally (KCSIE 2026). Further information and guidance is available on the WSCP website: Prevent counter-terrorism - Wandsworth Borough Council

Channel

School staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. CHANNEL AND PREVENT MULTI-AGENCY PANEL GUIDANCE.

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity.

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 in line with Keeping Children Safe in Education 2026.

Visitors are expected to sign in upon entry and wear a visitor's badge. (Amend in line with your schools / college based procedures)

Visitors to APSoL 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 enhanced DBS check with barred list information has been carried out through the LA Letter of Assurance.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into APSoL 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.

Fabricated or Induced Illness / Perplexing Presentation

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history;
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents;
- induction of illness by a variety of means.

Where this is identified and considered a risk a referral will be made to MASH for support and guidance. School may involve other agencies in making their assessments. That could include school nurse, community paediatrician, occupational therapists for example.

Risks Associated with Parent/Carer Mental Health

The majority of Parents who suffer mental ill-health are able to care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. Schools may refer to the NHS guidance Think Family and guidance on the NSPCC website in relation to Parental Mental Health.

Our approach is to recognise; seek support; instil preventive factors and monitor. The MASH can provide links and support with Wandsworth Adult Social Care if required. Designated Safeguarding Lead should seek support through Team Around Family (TAF) with family support but escalate to the MASH if they are concerned that the child involved is being placed at immediate risk of harm. The Wandsworth Family Information Service offers a range of Mental Health Services and details of the Early Help services available to children, young people and their families.

Drugs and Alcohol

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they affect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol should be built into the PSHE curriculum at developmentally appropriate levels. We work with our partners and Wandsworth LA to provide curriculum advice and guidance in this area. To access the most up to date information, see Wandsworth Safeguarding Children Partnership – Drugs and Alcohol and Wandsworth Council – Substance Misuse for further information. The Wirral Safeguarding Children Partnership have also produced a template School Drug Policy which is a useful resource.

Sexual harassment, violence against women and girls (VAWG), harmful sexual behaviours (inc. child on child abuse and 'upskirting')

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. 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.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges can be found in Part 5 of Keeping Children Safe in Education 2026. The charity Brook has produced a Traffic Light Tool that aims to help professionals identify, understand, and respond appropriately to sexual behaviours in young people, the website also offers a range of information, help and advice. The tool, and included guidance sets out, for different age ranges what are expected and normal behaviours, what are inappropriate or concerning, and what are likely to be harmful. For each level of behaviour the tool provides clear advice about how to respond.

It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, those who are gender questioning, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND. We recognise that these children can be targeted by other children, so it is vital a safe space is provided for these children to speak out and share their concerns with members of staff. Pupils must be protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism, and other forms of discrimination. Staff should be familiar with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act in July 2022 and how they apply to safeguarding.

Violence against women and girls (VAWG) refers to a range of crimes, with the common theme that they disproportionately affect women and girls. In 2021 the Government published the National Tackling Violence against Women and Girls Strategy (easy read version: click here). Schools should be aware of this strategy and develop ways to ensure that work is covered in school to respond to the four priorities, particularly **Priority 1: Prioritising Prevention** and **Priority 4: Strengthening the System.**

Child Sexual Abuse (CSA) - it is never a child's responsibility to prevent abuse, protect themselves or make the abuse stop. By better understanding child sexual abuse, having conversations and highlighting concerns, we can play a role in protecting children. We will use the CSA Response Pathway to respond to concerns of child sexual abuse at key points: from first concerns and early help safeguarding through to child protection and criminal justice responses.

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Schools must record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it. For more guidance, please refer to Part 5 of KCSIE 2026.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system and, and their wishes and feelings should be considered; the law on child-on-child abuse is there to protect them, not criminalise them.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people

Upskirting - '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. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

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;

Digital Safety, Remote Learning & Filtering and Monitoring

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users

- conduct: personal online behaviour that increases the likelihood of, or causes, harm

There is a Digital Safety policy, which covers the use of mobile phones, cameras, and other digital recording devices e.g., i-Pads. For online safety, there is within the policy support about children accessing the internet whilst they're at school using data on their phones (3G or 4G networks). The policy reinforces the importance of online safety, including making parents aware of what your school ask children to do online (e.g. sites they need to visit or who they'll be interacting with online). Governing bodies and proprietors are doing all that they reasonably can to limit children's exposure to the risks from the school's or college's IT system and ensure the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.

For online safety, there is recognition in this guidance that most children are using data on their phones, on the 3G or the 4G network. In schools, this means that not only must staff think about filtering and monitoring within the school's infrastructure, but they also need to have a policy about children accessing the internet whilst they are at school.

Filtering and monitoring

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks. Template example online safety policies and relevant appendices can be found through the following links: LGFL safeguarding resources, LGFL On-line Safety audit, SWGfl website. Additional support documents can be found here: Digital Safety Guides for Professionals (Wirral SCP).

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring. There is on-line safety guidance on the Wandsworth Safeguarding Children Partnership website designed to help young people, parents and carers, and professionals. to keep their children as safe as possible when online. THE NSPCC offers a wealth of advice on Keeping Children Safe On-line. Use of AI imagery will be monitored in line with the Child Protection-Safeguarding Policy (Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images).

All staff should have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and, DSLs as part of their 'lead responsibility' are expected to understand the filtering and monitoring systems and processes in place. Filtering and Monitoring should be part of the full staff CPD programme and governing body/trustees should be supported to understand their role in Filtering and Monitoring. The school should ensure adherence to the Meeting Digital and Technology standards in schools and colleges. and that staff understand their role in the published standards for 'Filtering and Monitoring'. DSLs are expected to have the 'lead responsibility'.

Filtering and Monitoring is included in the full staff CPD programme and governing body/trustees will be supported to understand their role in Filtering and Monitoring. DSL's will have 'lead responsibility' for Filtering and Monitoring and this is included within their job description.

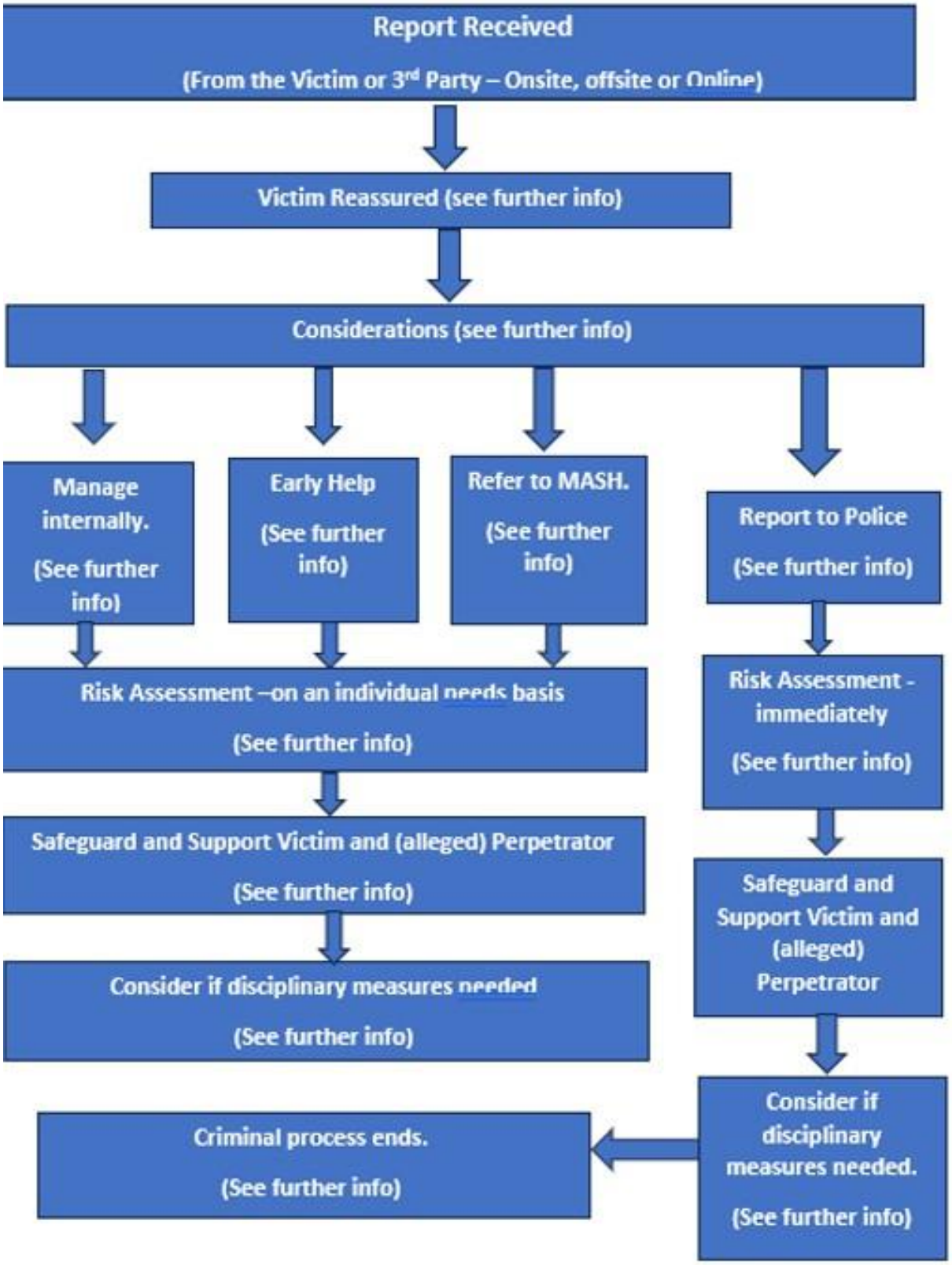
The policy for remote learning should demonstrate an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of their pupils to attend in person. (All IT policies are located on the school website and on APSOL shared drive for staff to access Providing remote education -guidance for schools

Appendix 6: SEXUAL VIOLENCE AND SEXUAL HARASSMENT FLOW-CHART

SOURCE: Keeping Children Safe in Education 2026 – GOV UK

(Part 5 – Child-on child sexual violence and sexual harassment (page 130-154)

School of London
anglo.portuguese



Appendix 7: Responding to a report of HSB, sexual harassment and/or sexual violence

SOURCE : PART 5 - KEEPING CHILDREN SAFE IN EDUCATION 2026

Further information

Victim reassured

- Taken seriously and kept safe, never be given an impression they are creating a problem,
- Confidentiality not promised,
- Listen to victim non-judgementally,
- Record the disclosure (facts as reported)
- Two staff present (if appropriate) – one being the DSL or reported to the DSL as soon as possible,
- Victim sensitively informed about referral to other agencies,
- If victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see Part 5 KCSIE 2026, paragraph 558)
- Parents of victim informed, unless this would put victim at greater risk.

If the victim is over 18, discuss how they want to be supported and by whom, whether they want you to support to share with their parents, whether they want to report a crime and provide them with support agency contacts (e.g. RASASC, SARC) which you can support them to contact. Again, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see Part 5 KCSIE 2026, paragraph 558)

Anonymity – Note that in cases of sexual violence there is a legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in school.

Supporting the (alleged) Perpetrator

- Inform parents of alleged perpetrator – advise of any referrals that need to be made,
- If appropriate, ask alleged perpetrator about the incident,
- Remove alleged perpetrator from any shared lessons with victim (this is a neutral act, not an assumption of guilt)
- Ensure they have a trusted adult in your setting to provide support.

Considerations

(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)

Immediately: consider how to support the victim and the alleged perpetrator.

- Wishes of the victim and parents/carers
- Nature of the alleged incident
- Are external support services required e.g. SARC, RASASC
- Ages of the children
- Development stage of the children
- Any power imbalance
- One off, or part of a pattern of behaviour

- Any on-going risks to victim, alleged perpetrator and others
- Other related issues and wider context (e.g. Exploitation, contextual safeguarding)

Manage internally

One-off incidents which the school/college believes that the young people are not in need of early help or statutory intervention, which would be appropriate for the setting to manage internally under the behaviour and/or anti-bullying policy.

Early Help

Non-violent harmful sexual behaviours (see Harmful Sexual Behaviours Framework, (NSPCC)) or refer to Brook Traffic Light Tool if trained. Also consider if a TAF is needed to identify unmet needs and support the young people involved.

Refer to MASH

All incidents where a child or young person has been harmed, is at risk of harm or is in immediate danger. Children's social care will support with next steps.

NB - Where a victim is 18 or over, consideration needs to be given as to whether they would be considered a vulnerable adult and therefore a referral to adult services would be appropriate.

Report to Police

All incidents of rape, assault by penetration or sexual assault (including if alleged perpetrator is 10 or under). Discuss next s teps with police, for example: disclosing information to other staff, informing alleged perpetrator and their parents.

Risk assessment

1. **Immediately** (when reported to police) – Do not wait for the outcome of the report to police before protecting victim. Emphasis should be on victim being able to continue normal routine.
   Alleged perpetrator to be removed from any classes with the victim (also consider shared spaces and journey to/from school. NB - this is not a judgement of guilt and safeguards should be considered as above, for the alleged perpetrator.

2. **Individual needs basis** – (see paragraphs 565 - 567 – Part 5 KCSIE 2026).
   All risk assessments should be completed as a multi-agency, where possible, (consider which agencies are currently working with either victim or alleged perpetrator) and shared with parents and victim or alleged perpetrator to ensure they are adhered to. You should not delay putting together a risk assessment if other agencies are not initially available in order to safeguard all involved and the school community, but this should be reviewed as a multi-agency as soon as possible.

Risk assessments should be regularly reviewed and adjusted as appropriate.

Safeguard and support Victim and alleged perpetrator

Identify and signpost to relevant support agencies e.g. RASASC

Disciplinary measures taken

Refer to setting's own behaviour and/or anti-bullying policy.

If reported to police, disciplinary measures may be undertaken based on balance of probabilities, unless prejudicial or unreasonable. Ensure actions do not jeopardise the investigation. Setting to work closely with police and/or other agencies.

Criminal process ends

Conviction or caution - follow your setting's behaviour policy. If the pupil remains in school, make clear your expectations, keep victim and perpetrator apart. Consider victim's wishes.

Not guilty – support victim and alleged perpetrator.

No further action – support victim and alleged perpetrator.

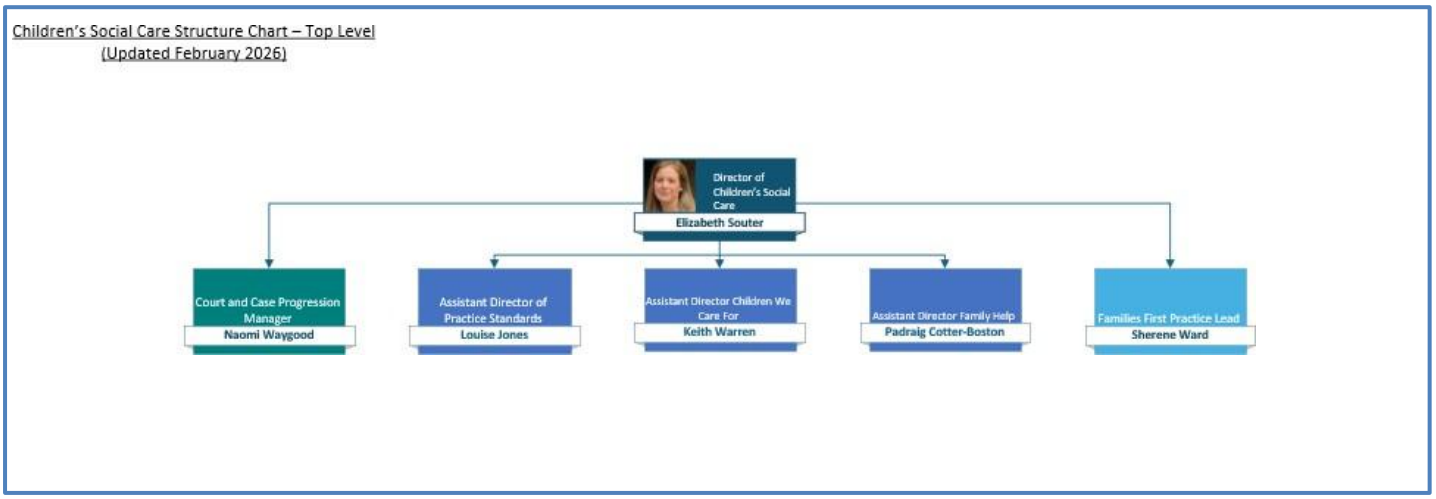
Appendix 9: WSCP CURRENT KEY PRIORITIES

WSCP CURRENT KEY PRIORITIES FOR 2025 -2027

FAMILIES FIRST SOCIAL CARE REFORMS	In line with the national Social Care Reform agenda, including recommendations from the Independent Review of Children's Social Care. Emphasises early help, relational practice, and community-based support to prevent crisis.
CHILDREN NOT IN SCHOOL	Safeguarding reviews have identified children completely disconnected from education, not captured by CME processes. These children are at high risk of chronic neglect, abuse, exploitation, or serious harm, due to lack of daily oversight and missed professional contact.
ANTI-RACIST PRACTICE, ACTIONS, BEHAVIOUR & CULTURE ACROSS THE PARTNERSHIP AND WITHIN ALL ORGANISATIONS	Local and national reviews show racial disproportionality in outcomes, referrals, and responses. Need for active, not passive, anti-racist practice in safeguarding Local Context: Black boys overrepresented in exploitation referrals and school exclusions / Concerns about biased language and unconscious bias in assessments
THEMES – 6-9 months per theme	
Child Sexual Abuse	• Often under-identified and under-reported • Children not always believed or supported appropriately • Strong local learning from reviews
On-Line Harms	• Growing threat via social media, gaming, and dark web • Children experiencing grooming, sexual abuse, radicalisation, self-harm content • Parents and professionals often feel ill-equipped
Working With Fathers	• Fathers (or father-figures) are often overlooked or excluded • Missed opportunities to assess risk, strengths, and protective factors • Local audits show limited meaningful engagement

Appendix 10 : Children's Social Care Structure Charts (updated Feb 2026)

CHILDREN'S SOCIAL CARE STRUCTURE CHART – TOP LEVEL (Updated Feb 2026)



FULL CHILDREN'S SOCIAL CARE STRUCTURE CHART – (Feb 2026)

ATTACHED TO POLICY DOCUMENT EMAIL FOR EASE OF REFERENCE.