



Darul Uloom London School

SAFEGUARDING POLICY

Last Reviewed: Monday, 1 September 2025
Next Review: Tuesday, 1 September 2026

SAFEGUARDING POLICY

INTRODUCTION

Darul Uloom London fully recognises its responsibility for safeguarding and child protection and is aware that the safeguarding and promotion of the welfare of children are of paramount importance.

Safeguarding and promoting the welfare of children is defined as:

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

THE POLICY

The whole ethos of Darul Uloom London aims to create an atmosphere of mutual respect and understanding of the needs of others, the promotion of fundamental British values and the stern stance against any act of terrorism, thus developing a sense of self-esteem and fulfilling an awareness of the importance of tolerance and co-existence. This is intrinsic in the aims and objectives of the school.

Darul Uloom London recognises that the threshold of tolerance is different for everyone. This Policy identifies the need to respect and support the needs of the individual in this domain.

We accept all applicants regardless of disability, ethnicity and sexual orientation. However, where a pupil has specific SEN, behaviour or emotional or physical needs, the school will develop an individual, robust welfare plan in partnership with all relevant stake holders.

This policy applies to all of the school community including senior leaders, the Board of Trustees, paid staff, volunteers, sessional workers, contractors, agency staff, students or anyone working on behalf of Darul Uloom London.

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

Every complaint or suspicion of abuse from within or outside the school will be taken seriously and action will be taken in accordance with this policy

REGULATORY GUIDANCE

This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004; with due regard and compliance to government publications including:

- Keeping Children Safe in Education (KCSIE), DfE 2025)
- Teaching Online Safety in Schools (DfE 2023)
- Voyeurism (Offences) Act 2019
- Working Together to Safeguard Children, December 2023 – Updated June 2025
- Guidance for safer working practice for those working with children and young people in education settings, 2019 (Safer recruitment consortium)
- Information sharing advice for safeguarding practitioners 2022
- The Serious Crime Act 2015
- The Prevent duty (DfE June 2015) including revised Prevent duty guidance, (Updated 2023)

- The Counter-Terrorism and Security Act 2015
- The children Act 1989, and 2004 Amendment
- The National Minimum Standards for Boarding Schools, 2022
- Ofsted-Inspecting safeguarding in early years, education and skills settings, 2019
- The Education (Independent School Standards) Regulations 2019
- The Education Act 2011
- The London child protection procedures, 2023
- What to do if You are Worried a Child is Being Abused, 2015
- Sexual violence and sexual harassment between children in schools and colleges, (DfE May 2018, updated 2021)
- Sexual offences Act 2003
- Malicious communications Act 1988
- Child Sexual Exploitation (DfE February 2017)
- The Children Act 1989 and 2004
- Behaviour in school Advice for Headteachers and school staff 2024
- Mental health and behaviour in schools 2018
- Send Code of Practice 2020
- The Designated Teacher for Looked After Children and previously LAC 2018
- General Data Protection Regulations (GDPR 2018)
- DfE Data Protection guidance for school (DfE, 2024)
- Disqualification under the Childcare Act 2018
- Children Missing in Education statutory guidance
- Children and Social Work Act 2017
- Governance Handbook DfE March 2020
- Relationships and Sex Education (RSE) and Health Education 2021
- The Ofsted Education Inspection Framework July 2023
- Education and Training (welfare of Children) Act 2021
- UK council for Internet Safety (2020)
- Teaching Online Safety in school (2023)
- Human Rights Act 1998 (HRA)
- Equality Act 2010, including the Public sector Equality Duty²³
- Domestic Abuse Act 2021
- The School staffing (England) Regulations 2009
- NPCC Guidance on Child centred policing – When to call the Police
- DfE Searching Screening and confiscation advice 2023
- UKCIS Sharing Nudes and semi nudes Dec 2020 (for education settings working with children and young people)
- Working together to improve school attendance, May 2022
- DfE: Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - 2023
- DfE: Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - 2023
- DfE: Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - 2022
- Cyber security standards for school and colleges (DfE, 2023)
- Filtering and monitoring standards (DfE, 2023)
- After-school clubs, community activities, and tuition Safeguarding guidance for providers, Sept 2023
- Generative AI: product safety expectations, Jan 2025

AIMS

The central aim of the policy is to ensure the safety and well-being of pupils in accordance with the above legislation. More specifically, the aims are to:

- Ensure all of the school community are aware of how to keep safe, recognise and report behaviour that is contrary to safeguarding.
- Recognise and support any child who has been subject to abuse.
- To deal appropriately with every suspicion or complaint of abuse;
- Ensure any paid/ voluntary staff appointed is done in accordance to safer recruitment procedures.
- To design and operate procedures which promote this policy;
- To, ensure that false allegations do not prejudice those who are innocent;
- To be alert to the medical needs of children with medical conditions;
- To have regard to sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and Associated regulations issued by the Secretary of State for Education (DfE)
- To identify, assess and act accordingly to those who are susceptible (vulnerable) to radicalisation, including providing support against extremist ideas
- To establish a safe and secure environment in which children can learn and develop
- To ensure that children on the school register, of compulsory school age do not miss out on parts of their education through continuous absenteeism
- To support the child's development in ways that will foster security, confidence and independence.
- To develop and promote effective working relationships, including with other agencies, especially the Police and Social Services.
- prevent impairment of children's mental (as well as physical) health and development

We recognise that staff are well placed to observe the outward signs of abuse. The school will create a positive ethos amongst the staff so that we can:

- Establish and maintain an environment where children feel safe, secure, valued and respected and that they feel confident and are encouraged to talk knowing that they are listened to.
- Ensure children know that there are adults in the school whom they can approach if worried
- Include opportunities in the PSHCE curriculum for children to develop the skills they need to recognise and stay safe from abuse.

These aims are affected by the following means

- Education: Through the curriculum, the School aims to teach pupils to understand what acceptable behaviour is and to speak up if they believe they or others are not being treated appropriately.
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- Staff Handbook: This contains the staff code of conduct, roles and responsibilities of staff and other relevant information in regard to safeguarding, behaviour and health and safety.
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- Staff Training: Safeguarding training for all staff is undertaken regularly as advised by the Bromley Safeguarding Board at specific intervals. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, and staff meetings), including online safety which, amongst other things, include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, all as required, but at least annually, to provide all staff and volunteers related to the school with relevant skills and knowledge to safeguard children effectively for staff recruited between these training sessions. There are safeguarding forms as part of the induction. Additionally, there are mechanisms in place to test staff knowledge on safeguarding. This includes pop questions during staff meetings or questionnaires.
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- Temporary staff and voluntary staff who work with our children are to be made aware of the school's arrangements and attend a training session with the DSL or his deputy.
- There is a designated person identified in respect of safeguarding children and young people. This is explicit in their job description. The DSL and his Deputy have been fully trained for the demands of this role in child protection and inter-agency working. The DSL's attends update and review training by the Bromley Safeguarding Children's Board every two years and have their knowledge and skills refreshed annually. The school's Designated Safeguarding Lead is responsible for the training of all staff in safeguarding issues. Records of all those who have attended training are kept centrally. The roles of the DSL and Deputy are explicit in their job role.
- All appropriate members of staff have received Safer Recruitment training.
- Preventing extremism and terrorism (PREVENT) training is also provided annually

RAISING AWARENESS WITH PUPILS

Darul Uloom London prides itself on its culture of open and effective communication between staff and pupils, and on its excellent pastoral support structures. We prepare all of our pupils to make reasoned, informed choices, judgements and decisions. Time is allocated for discussions and advice around safeguarding and also in developing within pupils the confidence of that which they require to recognise abuse. This includes advice on how to deal with abuse between pupils. All pupils know that there are a range of trusted people to whom they can turn to if they are worried. This also includes the independent listeners Mr. (MI) Abdul Alim and Mr. (MI) Mohammed Abdur-Rahman. The independent listener's contact details are displayed on information boards around the school. The school has a pastoral support person who can also be contacted, MI Abdul Majid Iltaf.

CHILDREN WHO NEED A SOCIAL WORKER

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them susceptible (vulnerable) to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

CHILDREN REQUIRING MENTAL HEALTH SUPPORT

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The Governing body will ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The Schools will access a range of advice to help in identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

LOOKED AFTER CHILDREN

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The trustees will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe and that appropriate staff have the information they need in relation to a child’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him. The designated safeguarding lead should have details of the child’s social worker and the name of the virtual school head in the authority that looks after the child.

Further information and guidance can be found in the following document:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children’s home or hospital are not considered to be privately fostered.

https://search3.openobjects.com/mediamanager/walthamforest/fsd/files/private_fostering_statement_of_purpose.pdf

It’s a legal duty (Children Act 1989) for parents or the private foster carer to notify the local authority of whenever a child is not living with a close relative. This should be done six weeks before the arrangement takes place or immediately if it is unplanned or already happening. This is so the local authority can work with private foster carers to keep children safe and also support anyone who is privately fostering. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

If the school becomes aware that a pupil may be in a private fostering arrangement, with someone to whom they are not related in that person’s home, The DSL will notify the Local Authority Children Services.

Fostering includes a child living with:	Fostering does not include a child living with:
Godparents	Mother/Father
Great Grandparents, Great Aunts or Uncles	Brothers/Sister
Cousins	Grandparents
Family Friends	Aunts/Uncles

Step parents where a couple isn't married or in a civil partnership	Step Parents where a couple is married or in a civil partnership
A host family which is caring for a child from overseas while they are in education here	Children and young people who are being looked after by the Authority.

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

Children with special educational needs (SEN) and disabilities or certain medical or physical health conditions can face additional safeguarding challenges. The trustees ensure that staff are aware of the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury related to the child's disability without further exploration;
- The potential for children with SEN and disabilities or physical health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so

SAFER RECRUITMENT PRACTICES

Darul Uloom London will always follow safer recruitment procedures so that we can be confident that all staff working in our school are safe to do so and no child is at risk. A conditional offer of employment is made whilst these are in process.

Disclosure and Barring Service (DBS) Checks: An enhanced DBS disclosure is required for all new appointments to the school. The school also insists on enhanced DBS checks for all drivers of taxis used by the school and has robust processes to check the suitability of contract staff and others working on the school site. The school is committed to reporting to the DBS any person (whether employed, contracted, volunteer or student) whose services are no longer used, and the DBS referral criteria are met. The enhanced DBS check with barred list information and acceptable references will be required before they begin work. At least one person in each recruitment process will have up to date safer recruitment training.

Other recruitment checks: These are carried out in line with KCSIE 2025, this includes, barred list checks, prohibition checks, references etc. Guidance including running the checks on the Employer Access online service. All checks are carried out through the school's HR department. All records are kept via the Single Central Register (SCR) and stored securely.

It is good practice for the school to inform shortlisted candidates that online searches will be carried out.

Please see the school safer recruitment policy for more details on the school's safer recruitment practices.

TRANSPARENCY

Darul Uloom London prides itself on its respect and mutual tolerance. Parents have an important role in supporting our school. We hope that all of the school community (parents, children, staff etc.) will always feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior management team.

Where someone feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels are:

- The Staff disciplinary, grievance and whistleblowing Policy
- The NSPCC whistleblowing helpline is available for all who do not feel able to raise concerns regarding child protection failures internally. Their contact details are 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

WHISTLEBLOWING

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Where a staff member feels unable to raise an issue, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing.
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

INTERACTION WITH PUPILS: CODE OF CONDUCT FOR STAFF

Members of staff are given copies of the Darul Uloom London's Staff handbook. Discussion of the procedures set out in our staff handbook forms a vital part of our induction procedure. It provides guidance for staff, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of abuse. It also provides guidance for staff, on how to deal with concerns and who to refer to when in need of assistance. The staff handbook is reviewed annually.

In order to ensure that staff are safe and aware of behaviours that should be avoided to ensure the prevention of risk of allegation they must need to;

- Be responsible for their own actions and behaviour and should avoid any conduct which would lead any person to question their motivation and intentions;
- Work in an open and transparent way.
- Take advice from DSL over any incident which may give rise to concern.
- Record any incidents or decisions made.
- Apply the same professional standards consistently.
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

Where extended school activities are provided by and managed by the school, our own Safeguarding Policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential trips and work-related activities, we will check that effective safeguarding arrangements are in place.

FIRST AID AND MEDICAL PLANS

Except in cases of extreme emergency, first aid will only be administered by qualified first aiders. All first aid treatment will be recorded and when needed will be shared with parents. Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a medical plan that has been agreed with parents.

CONFIDENTIALITY, INFORMATION SHARING AND TRANSPARENCY

Confidentiality is covered by the school's data protection policy, in line with the data protection legislation and GDPR (2018) – (DPA/UKGDPR). All records of confidential or personal nature are kept securely with the DSL and kept under lock and key. Whilst the Data Protection legislation places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children

Darul Uloom London prides itself on its respect and mutual tolerance. Parents have an important role in supporting our school. We hope that all of the school community (parents, children, staff etc.) will always feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding practices and know that such concerns will be taken seriously by the senior Leadership team.

The Governing body will ensure relevant staff have due regard to the relevant data protection principles, which allows them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR (DPA/UKGDPR).

This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR (DPA/UKGDPR). Where in doubt schools should seek independent legal advice.

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

Confidentiality is covered by the school's data protection policy, in line with the data protection legislation and GDPR (2018) (DPA/UKGDPR). All records of confidential or personal nature are kept securely with the DSL and kept under lock and key. Whilst the Data Protection legislation places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Sharing information regarding safeguarding children and young people within school enables staff to be especially vigilant around certain children. The school understands the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners and accordingly will do so.

The designated safeguarding lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

[NPCC- When to call the police](#) helps designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

If in doubt about sharing, see:

- Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018. (The seven golden rules for sharing information will be especially useful)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

- Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- at The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department <https://ico.org.uk/for-organisations/business/>
- in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

SUPPLY TEACHERS

In the case that there is an allegation against an individual not directly employed by the school, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency'), the school will

- ensure allegations are dealt with properly.
- under no circumstances decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

The Governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy him/her to another part of the school, whilst DSL/deputy DSL carries out their investigation.

Agencies will be fully involved and must co-operate in any enquiries from the LADO, police and/or children's social services. The school 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.

Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body when working in the school. They will be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, the school will inform the agency of its process for managing allegations. 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.

CONTRACTORS

Contractors who work on the school site will be made aware of this policy. Long-term contractors who work in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the SMT deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors and their employees to have direct access to pupils in non-teaching times.

EQUALITY Officer/Champion

We understand that risks can be compounded where children with protected characteristics lack a trusted adult with whom they can be open with. We therefore feel it is vital that we endeavour to reduce the additional barriers they face by allocating them with a safe space and a trusted adult (Equality officer) to whom they can speak out or share their concerns with.

The schools Equality Officer is Mr. Redwan Hussain

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

WHAT IS SAFEGUARDING AND CHILD PROTECTION

It is recognised that children need protection from:

- Abuse
- Physical harm
- Emotional abuse
- Sexual abuse
- Neglect
- Harmful material on the Internet

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protect children from other harms (e.g. drugs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences What is child abuse?

Child abuse is the term used when an adult/pupil harms a child or a young person under the age of 18 Child abuse can take four forms, all of which can cause long-term damage to a child: physical abuse, emotional abuse, neglect, exploitation and child sexual abuse. Bullying and domestic violence are also forms of child abuse.

Remember, this list does not cover every child abuse possibility. You may have seen other things in the child's behaviour or circumstances that worry you. Abuse is always wrong, and it is never the young person's fault.

Types of Abuse

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

community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

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

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

Child abuse can take many forms, but is usually divided into the following categories: They are defined in the DfE Statutory Guidance 'Keeping Children Safe in Education' (2022) as follows:

Abuse

A form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. In addition, abuse and harm may also include children witnessing the ill-treatment of others and that this particularly relevant when children see, hear or experience domestic abuse and its effect.

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.

Physical indicators include:

- Unexplained bruises/welts/lacerations/abrasions: on face, lips, mouth or torso, back, buttocks, thighs, in various stages of healing
- clustering, forming regular patterns
- reflecting the shape of an article used e.g. belt, buckle, electrical flex
- On several different surface areas
- Bite marks or fingernail marks which regularly appear after absence, e.g. after a weekend
- Unexplained burns:
 - Cigar or cigarette burns, especially on soles, palms or back
 - Immersion burns where hands, feet or body have been forcibly immersed in very hot water patterns like electrical burner, iron etc.
 - Rope burns on arms, legs, neck or torso
- Unexplained fractures to skull, nose, facial structure in various stages of healing
- Multiple or spiral fractures
- Behavioural indicators include:
 - Flinching when approached or touched
 - Reluctance to change clothes for P.E. lessons
 - Wary of adult contacts
 - Difficult to comfort
 - Apprehension when other children cry
 - Crying or irritability
 - Frightened of parents
 - Afraid to go home
 - Rebelliousness in adolescence
 - Behavioural extremes – aggressiveness, withdrawal, impulsiveness
 - Reports injury caused by parents
 - Depression
 - Poor peer relationships

- Panics in response to pain

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical indicators of neglect include:

- consistent hunger
- inappropriate dress
- consistent lack of supervision, especially in dangerous activities for long periods
- unattended physical problems or medical needs
- abandonment

Behavioural indicators include:

- begging; stealing food
- constant fatigue, listlessness
- poor relationship with care-giver
- frequent delays in picking the child up from school
- Mental health & Depression

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

Physical indicators include:

- Difficulty in walking or sitting down
- stained or bloody underclothing; pain or itching in the genital area
- bruising, bleeding, injury to external genitalia and/or anal areas
- bed wetting
- excessive crying
- Sickness

Behavioural indicators include:

- Inappropriate sexual behaviour or knowledge for the child's age
- Promiscuity
- Sudden changes in behaviour
- Running away from home
- Wary of adults

- Feeling different from other children
- Sucking, biting
- Anti-social, destructive behaviour
- Unusual avoidance of touch
- Reporting of assault
- Substance abuse e.g. glue sniffing
- Emotional withdrawal through lack of trust in adults
- Over-compliance with requests of others
- Frequent complaints of unexplained abdominal pains
- Eating problems or sleeping disturbances
- Poor peer relationships
- Possessing money or 'gifts' that cannot be properly accounted for
- Inappropriately sexually explicit drawings or stories
- Enuresis or soiling, especially at the end of the school day
- Frequent non-attendance at school
- Avoidance of school medicals

Sexual violence as defined by the sexual violence and sexual harassment advice 2018 as any offence under the Sexual Offences Act 2003. Sexual harassment is defined as 'unwanted conduct of a sexual nature' that can occur online and offline. The same guidance also defines harmful sexual behaviour as sexual behaviour that is inappropriate, problematic, abusive and/or violent.

Specific safeguarding issues of which staff should be aware are: a child missing from education, a child missing from home or care, child sexual exploitation (CSE), bullying including cyberbullying, hate, domestic violence, drugs, fabricated or induced illness, faith abuse, gangs and youth violence, gender based violence/violence against women and girls (VAWG), mental health, private fostering, sexting, relationship abuse and trafficking.

All staff will have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Annex B Keeping Children Safe in Education Sept 2025 will be read out during training sessions and staff will be briefed on this

Emotional Abuse

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

- Failure to thrive

- Delays in physical development or progress Behavioural indicators include:
- Sucking, biting, rocking
- Anti-social, destructive behaviour
- Sleeping disorders, inhibition of play
- Compliant, passive, aggressive, demanding, inappropriately adult or infant behaviour
- Impairment of intellectual, emotional, social or behavioural development

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

CSE / CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

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

CSE/CCE can include children 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 CSE/CCE:

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

CSE/CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE/CCE does not always involve physical contact; it can also occur through the use of technology. CSE/CCE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and nonpenetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

- The above CCE indicators can also be indicators of CSE, as can:

Children who have older boyfriends or girlfriends; and

- Children who suffer from sexually transmitted infections or become pregnant.

Both CSE and CCE are forms of abuse. 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. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. 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.

SERIOUS VIOLENCE

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and susceptible (vulnerable) adults: county lines guidance.

EXTRAFAMILIAL HARM – CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be susceptible (vulnerable) to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

As well as threats to the welfare of children from within their families, children may be susceptible (vulnerable) to abuse or exploitation from outside their families. These extra-familial threats/harm might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be susceptible (vulnerable) to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

CHILD-ON-CHILD ABUSE

Child-on-child abuse should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. It must be recognised that this form of abuse is gendered in nature (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously.

Students over the age of 18 will be referred to as adult students. Incidents involving abuse between two adult students may be considered peer-on-peer abuse. If a child (a student under the age of 18) is involved in an incident with an adult student, the Designated Safeguarding Lead (DSL) will carry out an immediate risk assessment. This assessment will determine whether the child or other children are at risk of harm if the adult student remains on the premises while an investigation is pending. The DSL will then take appropriate safeguarding action, in accordance with statutory guidance, including considering the need for the adult student to be removed from the premises temporarily, pending further investigation.

The different forms child-on-child abuse can take, such as:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

Child, previously referred to as Peer abuse, is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. All staff should recognise that children are capable of abusing their peers. All staff should be aware of safeguarding issues from Child (peer) abuse including:

- bullying (including online bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment • sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals. This abuse can:
 - Be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
 - Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm Children or young people who harm others may have additional or complex needs e.g.:
- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement

- Involved in crime Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical.

School staff, alongside their Designated Safeguarding Lead and/or Deputy, have to make their own judgements about each specific case and should use this policy guidance to help.

2. Responsibility

Keeping Children Safe in Education (KCSIE), 2025 states that 'Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of child-on-child abuse and sets out how allegations of child-on-child abuse will be investigated and dealt with'. It also emphasises that the voice of the child must be heard Child-on-child Abuse Policy 'Governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all system and processes should operate with the best interests of the child at their heart.'

Expected staff action

Staff should consider the seriousness of the case and make a quick decision whether to inform the Designated Safeguarding Lead immediately before taking any further in-school actions.

Recognising peer abuse

An assessment of an incident between peers should be completed and consider:

1. Chronological and developmental ages of everyone involved
2. Difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability
3. All alleged physical and verbal aspects of the behaviour and incident
4. Whether the behaviour involved inappropriate sexual knowledge or motivation e. What was the degree of physical aggression, intimidation, threatening behaviour or bribery
5. The effect on the victim
6. Any attempts to ensure the behaviour and incident is kept a secret
7. The child or young person's motivation or reason for the behaviour, if they admit that it occurred
8. Whether this was a one-off incident, or longer in duration is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. Avoid language that may create a 'blame' culture and leave a child labelled.

Staff will talk to the children in a calm and consistent manner. Staff will not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

COUNTY LINES

The UK Government defines county lines as:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become

trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals. Metropolitan Police information leaflets raising awareness about Cuckooing are available from the council website in English, Bengali and Somali.

KNIFE CRIME

Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife-carrying. However, there are many different criminal offences relating to knives. For example:

- it is an offence to threaten or cause harm to a person with a bladed weapon
- some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18
- offences such as robbery or assault can be aggravated if a knife is involved
- it is also an offence to carry a knife in a public place without good reason.

It is clear that knife crime is an increasing safeguarding risk to children, both at school and in their local communities. While we have not sought to answer the question of the causes of knife crime, leaders told us that, in their experience, children are in three categories of risk of knife-carrying:

- The highest level of risk is for those children who have been groomed into gangs, for the purposes of criminal exploitation.
- Underneath this lies a group of children who have witnessed other children carrying knives, have been the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on social media.
- Then there are children who carry knives to school as an isolated incident. For example, they may carry a penknife that a grandparent has gifted them.

Knife crime is just one issue among many faced by children that leaders in schools have to understand and manage on a daily basis.

It is important to remember that knife crime does not exist in a vacuum and children who are victims or perpetrators may also be experiencing multiple vulnerabilities.

The common denominator of pupils who are found carrying bladed objects into school is their vulnerability. Almost invariably, these children have experienced poverty, abuse or neglect or are living within troubled families. They may also experience social exclusion due to factors such as their race or socio-economic background. Those involved were also more likely to be low attainers academically compared with their peers.

The most dangerous time for children is shortly after school, between 4pm and 9pm, So, while children might be safe on site, their safety after school is a concern for children, their parents and their teachers. The school set high expectations regarding pupils' behaviour on the buses and out of school.

Children need help and support to prevent them becoming either victims or perpetrators of knife crime. As such, local responses to knife crime are being framed within the context of the government's Serious

Violence Strategy¹ and in London by The Mayor's Office for Policing and Crime's (MOPAC) London Knife Crime Strategy Both strategies identify that, in addition to law enforcement, multi-agency and partnership work with children is crucial to addressing knife crime that affects them.

It is important to note that the issue of relative poverty is an important factor in knife crime among children and young people. The underlying socio-economic drivers behind knife crime cannot be ignored. Wider considerations of the lived experiences of children growing up in poverty and, in particular, in areas with disorder problems, must form part of a multi-agency response to knife crime.

DOMESTIC VIOLENCE or ABUSE (DV or DA)

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 children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

"Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others."

Domestic abuse is not always physical violence. It can also include:

- coercive control and 'gaslighting'
- economic abuse
- online abuse
- threats and intimidation
- emotional abuse
- sexual abuse

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, religion, socio-economic status, sexuality or background.

If you believe that you are a victim of domestic abuse, there are signs that you can look out for including:

- being withdrawn, or being isolated from your family and friends
- having bruises, burns or bite marks on you
- having your finances controlled, or not being given enough to buy food, medication or pay bills
- not being allowed to leave your house, or stopped from going to college or work
- having your internet or social media use monitored, or someone else reading your texts, emails or letters
- being repeatedly belittled, put down or told you are worthless
- being pressured into sex or sexual contact
- being told that abuse is your fault, or that you're overreacting

These changes reflect the general increased awareness of the wider impact of domestic abuse, and come at a time following the pandemic when, according to the [Office for National Statistics](#), domestic abuse victim services saw "an increase in demand", particularly as lockdown measures eased.

Free, confidential support and advice is available to victims and their concerned family members or friends, 24 hours a day.

0808 2000 247 - <https://www.nationaldahelpline.org.uk/Chat-to-us-online>

More details on Domestic Abuse can be found via the <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>

STUDENT SEARCHES

The need for pupils to have an 'appropriate adult' during police investigations

In the annexed information at the end of KCSIE, on page 162, under the subheading "working with others", a small but crucial change has been made to one of the bullet points.

"[DSLs should]...liaise with the headteacher or principal to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. **This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.**"

PACE Code C 2019 details the role a person undertakes when acting as the "appropriate adult" (usually a parent, guardian or social worker) while a student is being questioned or detained by the police.

It includes an expectation that the appropriate adult will "support, advise and assist" the young person, and also "observe whether the police are acting properly and fairly to respect [the young person's] rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not".

Additional and guidance recommendations have also been made in the **Child Q safeguarding practice review, conducted by the City of London and Hackney Safeguarding Children Partnership.

The lack of an appropriate adult was one of the key failings noted in the review when it stated: "It is likely that the importance of the appropriate-adult role was insufficiently explained to either Child Q or the school staff present."

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Our DSL is aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity if our children and family are experiencing homelessness. 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 will be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

¹ 'Serious violence strategy', Home Office, 2018; www.gov.uk/government/publications/seriousviolencestrategy.

² 'The London knife crime strategy', MOPAC, 2017; www.london.gov.uk/mopac-publications/mayorsknifecrime-strategy-putting-stop-knife-crime-london. 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.

ABUSE LINKED TO FAITH, BELIEFS AND CULTURE

Child abuse is never acceptable in any community, in any culture, in any religion, under any circumstances. However, some children are subject to certain kinds of child abuse linked to their faith, belief or culture and this includes abuse that might arise through a belief in spirit possession or other spiritual or religious beliefs.

This kind of abuse can also include;

- Belief in concept of witchcraft, magic or voodoo
- Demons or the devil acting through children or leading them astray
- The evil eye or djinns and dakini
- Ritual or muti murders
- Breast Ironing
- Female Genital Mutilation
- Honour based violence, Child Marriage and, or Forced Marriage
- Chastisement of a child in a Place of Worship

Child Abuse linked to faith and/or belief is not confined to one faith, nationality or ethnic community. Examples have been recorded worldwide among Europeans, Africans, Asians and elsewhere as well as in Christian, Muslim, Hindu and pagan faiths among others.

Not all those who believe in witchcraft or spirit possession harm children. Data on numbers of known cases suggests that only a small minority of people with such beliefs go on to abuse children.

CHILD MARRIAGE, and or FORCED MARRIAGE

Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. If it is found that a forced marriage has taken place with any child then the DSL will refer to The Forced Marriage Unit's Multi-agency guidelines, pages 32-36 and Contact the Forced Marriage Unit if any further advice or information is required: 020 7008 0151 or email fmu@fco.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

'HONOUR-BASED' ABUSE (HBA)

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

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of HBA or already having suffered HBA. There is a range of potential

indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or Child marriage or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multiagency statutory guidance on FGM and in KCSIE focus on the role of schools and colleges and pages 1314 of the Multi-agency guidelines: Handling case of Child marriage or forced marriage. If staff have a concern regarding a child that might be at risk of HBA, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. From October 2015 every adult who is concerned about a child who may be at risk of FGM has an obligation to report this to the police. This is included in this policy as it could be a member of the child's family who has/will undergo the procedure and they are making a disclosure on their behalf.

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff should follow local safeguarding procedures.

FEMALE GENITAL MUTILATION (FGM)

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

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

Risk factors for FGM include:

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

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

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

MENTAL HEALTH

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote 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.

The school will access a range of advice to help identify children in need of extra mental health support. This includes working with external agencies as described in the DfE guidance on mental health and behaviour in schools

The following Rise Above website has links to all materials and lesson plans, which may be used:

PREJUDICED BEHAVIOUR

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – for example disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

TEENAGE RELATIONSHIP ABUSE

Teenage relationship abuse is a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. This abuse may be child sexual exploitation.

HARMFUL SEXUAL BEHAVIOUR (HSB)

The Local Authority Harmful Sexual Behaviour Lead is available to provide support and advice to educational establishments, which is supplemented by detailed guidance and support in the AIM for Education Settings manual. Much of the assessment guidance and resources derive from the AIM

CONSENSUAL AND NON-CONSEXUAL SHARING OF NUDE AND SEMI-NUDE IMAGES

AND VIDEOS – FORMERLY REFERRED TO AS SEXTING OR YOUTH PRODUCED SEXUAL IMAGERY

There is a number of definitions but, for the purposes of this policy, sharing of nudes (sexting) is simply defined as images or videos generated by children under the age of 18, or of children under the age of 18, that are of a sexual nature or are indecent. These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know. Sexting may be categorised as:

Aggravated incidents of sexting involving criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who was pictured.

Experimental incidents of sexting involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation. Wolak and Finkelhor 'Sexting: a Typology' March 2011

Young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988.

At Darul Uloom London School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

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

The allegation:

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

In cases of 'sexting', Darul Uloom London will follow the guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sexting in schools and colleges, responding to incidents, and safeguarding young people.

SHARING NUDES

What is meant by sharing nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices

via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to light?

Report it to the DSL or his Deputy immediately.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Incidents can be broadly be divided into two categories:

1. aggravated: incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
 - a. adult involved: adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders
 - b. youth only – intent to harm: these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people
 - c. youth only – reckless misuse: no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result
2. experimental: incidents involving the creation and sending of nudes and seminudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
 - a. romantic: incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair
 - b. 'sexual attention seeking': the phrase 'sexual attention seeking' is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image
 - c. other: cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives

Appropriate	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision-making	Single instances of inappropriate sexual behaviour Behaviour accepted by peers within peer group context Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviours Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically and/or sexually arousing to the perpetrator Sadism

The Law

Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

- it is an offence to possess, distribute, show and make indecent images of children
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide based on what is the recognised standard of propriety.

Indecent imagery does not always mean nudity, however images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

UPSKIRTING

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

SEXUAL VIOLENCE

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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.

SEXUAL HARASSMENT

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped.
 - sexual exploitation; coercion and threats; and
 - upskirting.

How do we respond to reports of Sexual Violence and Sexual Harassment

Don't downplay inappropriate behaviour as 'banter' or as a 'joke'

It is “especially important” to challenge inappropriate behaviour and not pass it off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

Downplaying such behaviour can create an unsafe “culture of unacceptable behaviour”, stop children reporting problems. In the worst cases it “normalises abuse, leading to children accepting it as normal” thus creating further issues and a toxic environment.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Guidance from the DFE is clear that it does not attempt to provide (nor would it be possible to provide) detailed advice on what we should do in any or every particular case; it provides effective safeguarding practice and principles for us to consider in our decision making process. Ultimately, all decisions in Darul Uloom London will be made on a case-by-case basis. The Designated Safeguarding Leads (DSLs) will take the leading role and will use their professional judgement, supported by other agencies, such as children’s social care and the police as required.

Some situations are statutorily clear:

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape
- rape, assault by penetration and sexual assault are defined in law; and
- creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.

Our basic safeguarding principle is: if a child has been harmed, is in immediate danger, or is at risk of harm a referral should be made to children’s social care. A social worker should respond to the referrer within one working day to explain what action they will be taking. We will usually inform parents that we are making a referral to children’s social care; however, this too is on a case by case basis. It may be that we have assessed the situation and believe that a referral is needed without parental knowledge in order to safeguard students involved.

Once a referral is processed children’s social care will consider if early help, section 17 and/or 47 statutory assessments are appropriate (see Keeping Children Safe in Education on our policies page for an explanation of this process). We will support in an early help assessment, child protection enquiry, strategy discussion and child protection conference.

We will work closely with the police as rape, assault by penetration and sexual assaults are crimes. Where there is a report of a rape, assault by penetration or sexual assault, the starting point is it should be passed to the police who will advise and log according to their own guidelines. The DSL will liaise with our Schools Safe Officer.

RESPONDING TO REPORTS OF SEXUAL VIOLENCE AND SEXUAL HARASSMENT

We are aware that incidents of sexual violence and sexual harassment that occur online (either in isolation or in connection to offline incidents) can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and services and for things to move from platform to platform online. It also includes the potential for the impact of the incident to extend further than our local community (e.g. for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

We will act in accordance with our Bullying policy if we are made aware that our students are using online platforms which in any way jeopardises the safety of other members of our school community.

Staff should be encouraged to report even on “a sense of unease or a nagging doubt” or ‘overfriendly’ colleagues via code of conduct and safeguarding policies.

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

Any such concerns should be “shared responsibly”, properly recorded and dealt with “appropriately”. This should also “protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.”

The immediate response to a report - Managing the disclosure

We will always do our utmost to ensure that victims are reassured that they are being taken seriously and that they will be supported and kept safe. In some cases, the victim may not make a direct report or disclosure. For example, a friend may make a report or a member of our school may overhear a conversation that suggests a child has been harmed. As with all safeguarding concerns, our staff are trained to follow the school protocol regarding the recognised signs of safety and will speak to one of the DSLs. This discussion will be handled sensitively and with the support of children’s social care if required.

Our safeguarding practice includes:

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example with the designated safeguarding lead or children’s social care) to discuss next steps.
- only sharing the report with those people who are necessary in order to progress it.
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the disclosure will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what etc;
- when making a record of the disclosure we wait until the end of the disclosure and immediately write up a thorough summary and make a log. This allows us to devote our full attention to the student and to listen to what they are saying. It may be appropriate to make notes during the disclosure (especially if a second member of staff is present). However, if making notes during any disclosures we are conscious of the need to remain engaged with the student;
- we make sure to only record the facts as the student presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such disclosures could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
- if possible, we aim to manage disclosures with two members of staff present,

(preferably one of them being the DSL). However this might not always be possible; and

- informing the designated safeguarding lead (or deputy) as soon as practically possible if the designated safeguarding lead (or deputy) are not involved in the initial disclosure.

Duty on schools even if abuse took place beyond their gates

Darul Uloom London will have regards to reports of sexual harassment or violence and will “respond appropriately” even if reports have taken place beyond their gates. Liaising with relevant agencies is imperative.

The designated safeguarding lead is best placed to advise on the school's initial response. The same considerations, such as the victim's wishes, ongoing risks and potential criminality, are listed for all reports regardless of their location.

Act immediately rather than 'waiting to be told'

Darul Uloom staff must "maintain an attitude of 'it could happen here'" towards sexual abuse and violence.

Staff must act on any concerns immediately "rather than waiting to be told", giving the example of conversations staff overhear or aspects they notice of children's behaviour.

Schools not recognising the scale of harassment and abuse or downplaying linked behaviours can create a "culture of unacceptable behaviour".

A lack of reports on child-on-child abuse "does not mean it is not happening" and staff should report any concerns to designated safeguarding leads.

SUPPORTING THE VICTIM

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- Support can include:
 - Early help and children's social care (see previous sections of this policy).
 - Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools to ensure the best possible outcomes for the victim.
 - Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.

- Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of that they think might have been shared online, to see if they can be removed from the internet.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). The School should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the school should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the schools should provide a physical space for victims to withdraw.

It may be necessary for the schools to maintain arrangements to protect and support the victim for a long time. The School should be prepared for this and should work with children's social care and other agencies as required.

It is therefore important that the DSL knows how and where to seek support.

It is important that the school does everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in the school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Information sharing advice referenced in earlier section of this policy will help support this process.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

Advice about safeguarding and supporting the alleged perpetrators is also set out in DfE advice: [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles are based on effective

safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- The school will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. More information on HSB can be found at paras 18-22 of the detailed advice, [Sexual violence and sexual harassment between children at schools and colleges](#). Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police. The NSPCC also provides free and independent advice about HSB: NSPCC Learning - [Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework](#).
- The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- [Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
- StopItNow - [Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- DfE Advice on [behaviour and discipline in schools](#) is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair. Further information about exclusions can be found in statutory guidance for schools Exclusions from maintained schools, academies and PRUs.
- School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file. See Information sharing advice in a earlier section of this policy to support this process.
- [Stop it now - professionals looking for advice](#) provides support for professionals in child sexual abuse prevention, so that they're well equipped to keep children safe.

WHAT IS CHILD SEXUAL ABUSE

Child sexual abuse means any sexual activity with a child, including physical contact, nonpenetrative acts such as touching and kissing, and non-contact activities (such as producing sexual images or forcing the young person to watch sexual activities). It can also occur online: mobile phones, computers, and other devices allow for the quick, secretive exchange of explicit images (sexting) or sexual conversations.

Children can be sexually abused by a peer or someone younger than them – in fact, research has found that two thirds of abuse reported by children and young people was perpetrated by other children and young people (Hackett, 2014). In these cases, the abuse can be harmful to both the perpetrator and the victim.

It is important to remember that abuse can happen to anyone at any stage of childhood. It is never a child's fault that they were sexually abused. They often might not understand that what's happening is abuse, or that it's wrong – they may also be afraid to tell someone about it. However, there are often warning signs that you can identify and act on to help them.

Consequences of Abuse

Sexual abuse can lead to long-lasting consequences throughout children's lives. These might include:

- Anxiety and depression.
- Eating disorders.
- Post-traumatic stress disorder.
- Self-harm.
- Suicidal thoughts and suicide.
- Sexually Transmitted Infections (STIs).
- Pregnancy.
- Problems returning to – or continuing with – education.
- Feelings of shame and guilt.
- Drug and alcohol problems.
- Relationship problems with family, friends, and partners.

This is why it is so vital to do your/our part in preventing sexual abuse where you can.

WHAT ARE THE CAUSES OF SEXUAL ABUSE IN SCHOOLS

There is no simple answer to the question of what causes sexual abuse. However, it has been suggested that the following factors may play a part:

- Toxic school culture where sexual harassment and abuse are tolerated or trivialised. Normalising the abuse makes it easier for perpetrators to carry it out. For example, some schools dismiss it as 'banter' or 'part of growing up' (Keeping Children Safe in Education, DfE).
- Sexism and misogyny – attitudes like these lead people to treat others with no regard or respect. Gender-based stereotypes are often used to justify or excuse sexual abuse.
- The perpetrator having experienced abuse themselves. In reaction to their own experiences, perpetrators may attempt to find control and power by abusing others – or they may simply act out an experience they have witnessed or been involved in before, not realising that it is wrong.

susceptible (vulnerable) Groups

Some children are particularly Susceptible (vulnerable) to sexual abuse, including:

- Those with previous experience of abuse.
- Those who are in care.
- Those who have experienced bereavement.
- Those with low self-esteem, low confidence, and/or few friends.
- Those who are young carers.
- Those who spend a lot of time home alone.
- Those with disabilities.

It is important for schools to look at the greater picture rather than isolated incidents in order to prevent sexual abuse from occurring. This is known as contextual safeguarding – after an incident of abuse, you

need to consider whether other children are at risk, who is most Susceptible (vulnerable), whether there are any potentially unsafe spaces on the premises or in their local area, and what they could do to make these places safer. Sexual abuse is still your responsibility if it happens outside school – if you are aware of incidents occurring in the local park, for example, you should pass this information on to the police so that they can act accordingly.

Supporting Victims and Perpetrators

Supporting Victims

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. We will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

We understand that victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other children.

The victim will be provided with support and reassured that they will be kept safe and taken seriously at all times. Children who have been abused will most likely need additional support in the school environment. Classroom teachers have the opportunity to provide an environment where the child can begin to succeed and recognise that he is capable and valued.

The most important ingredient in a safe classroom is the teacher's attitude toward students. The most crucial belief a teacher must have is that the child is not to blame. There is nothing that a child can do to prevent or stop the abuse.

To offer support, the teacher must, first, be approachable. If an abused child begins to tell what is happening, positive body language will encourage the child to continue. The teacher must also watch for cues about how to respond. The child may either want to be comforted physically or may not want to be touched. At this point, it is more important to actively listen than to comment or ask questions.

Listening to those who will talk is important; however, some students will be unable to share verbally what is happening. In these instances, the teacher must be observant.

Although a teacher may doubt the story, it is vitally important to believe the child. The child is taking a significant step in trusting the teacher enough to tell what is happening. To betray that trust would repeat the betrayal experienced when an adult abused the child and failed to serve as a protector. Even though the explanation may be fragmented, teachers should listen supportively and (if needed) ask open-ended questions to fill in gaps. Sometimes after telling the secret, the child may recant the story due to fear, threats, or acceleration of the abuse.

The support that is required to the abused child should consider all of the following¹:

Expectations. Teachers can honour the strength and courage of these children by having high expectations for them. Emotionality may interfere with thinking; therefore, it is important to set reasonable goals and to provide the support needed for the child to feel confident in his abilities. School can be a place where children rebuild their self-esteem, assert themselves, and see themselves as successful.

Structure. Abused children may feel powerless to control much in their environment. To cope, they may:

- refuse to even try to control what happens around them;
- strive to manipulate everything they can by bossing peers and controlling belongings; and
- express disproportionate feelings whenever they feel threatened.

When these children fly off the handle with little provocation, they may be doing so to try to establish control. To help the child feel a sense of control in a positive manner, teachers should give accurate

¹ <https://www.ascd.org/el/articles/supporting-victims-of-child-abuse>

information and build trust. Allowing expression of feelings when appropriate through art, music, drama, and/or creative writing will also help the child to feel less controlled by pent-up emotion.

Identity. Children who have been abused in ways that met an adult's needs and denied the child's needs have little sense of personal identity. Teachers can help by pointing out the child's strengths. Statements such as

- "You are a hard worker,"
- "You are a good friend when you help a classmate with a problem," and
- "People in this classroom like you because you are fun to be with"

will help the child understand how others perceive him or her. Teachers can also help abused children gain a sense of personal identity by asking questions that help them formulate a position on issues, administering interest inventories, and teaching decision-making and problem-solving skills. These skills will assist in interpersonal relationships as well as in self-understanding.

Self-esteem. Abused children have little self-esteem. Teachers can help them learn that they are valued, accepted, and capable by fostering an environment that honors each child's uniqueness. Valuing differences will enable children to begin to see themselves as having something to contribute that others appreciate. With each successful completion of a classroom task, the child's sense of competency will be fostered.

- **Sense of belonging.** Abused children think they did something wrong and that they are bad. Because they have kept a secret from everyone, they assume there is a reason for them to be isolated from others. To facilitate a sense of belonging, the teacher may provide designated places for possessions, display work in the classroom, and make a conscious attempt to include these children in classroom activities. Support through teaching social skills individually, in small group settings, and through cooperative learning will also help abused children practice interacting in a nonthreatening atmosphere.
- **Social skills.** Because abused children have not learned to listen to their inner selves, they may focus on pleasing and meeting the needs of others while neglecting their own needs. Having been introduced to the adult world through an abusive relationship, the child may have learned inappropriate behaviours and language. The child may feel unworthy to interact on an equal basis with others and may fear rejection. A classroom climate that fosters caring, appreciation for differences, consistent rules and boundaries, and recognition for small successes will nurture a child who has been discounted at home.
- **Tolerance of differences.** Because each child will respond in a unique way to abuse, classroom behaviours may be variable. Some of the feelings an abused child may experience are anxiety, guilt, embarrassment, depression, anger, and resolution. Consultation with a school psychologist, social worker, counsellor, or nurse may also help teachers understand unexplainable behaviours and emotions of their students.

Further support for the victim may consider:

- Revisiting online safety advice
- Supporting parents with online safety advice and with general safety advice at home or outside the home
- Activities that will help the pupil to keep themselves more safe in future (e.g. remove himself from group chats)

These can be done as whole class or whole school activities thus reassuring the abused pupil that the guidance is for all pupils not just for them.

Supporting Child Perpetrators of Abuse

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate

behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

We will ensure the perpetrator will also be provided with appropriate support.

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. We will be very clear as to what its approach is. (See Behaviour and sanctions policy).

We understand that school is a protective factor for children who have displayed HSB, and will ensure that continued access to school, with a comprehensive safeguarding management plan is in place, before any final decisions are made. If an alleged perpetrator does move to another educational institution (for any reason), then the new educational institution will be made aware of any ongoing support needs and where appropriate, potential risks to other children and staff.

Children who have abused other children will most likely need support in order ensure that they understand the seriousness of their actions and to stop it from happening again.

The support that the school can provide should consider the following activities that help the pupil to:

- in the future, "Make the right Choices"
- in the future, "Stop making wrong choices"
- to understanding the abuse from the victims perspective

RECORD KEEPING

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the DSL (or deputy).

NSPCC HELPLINE

All should be aware that a NSPCC helpline has been created to support victims of sexual harassment and abuse in education settings (both children and adults). It can also provide support to parents and professionals. You can use this helpline if you have concerns and don't know what to do, or you could give the number out to parents, colleagues, and students in your school. The helpline is available at **0800 136 663**.

Email - help@nspcc.org.uk

PREVENTATIVE STRATEGIES

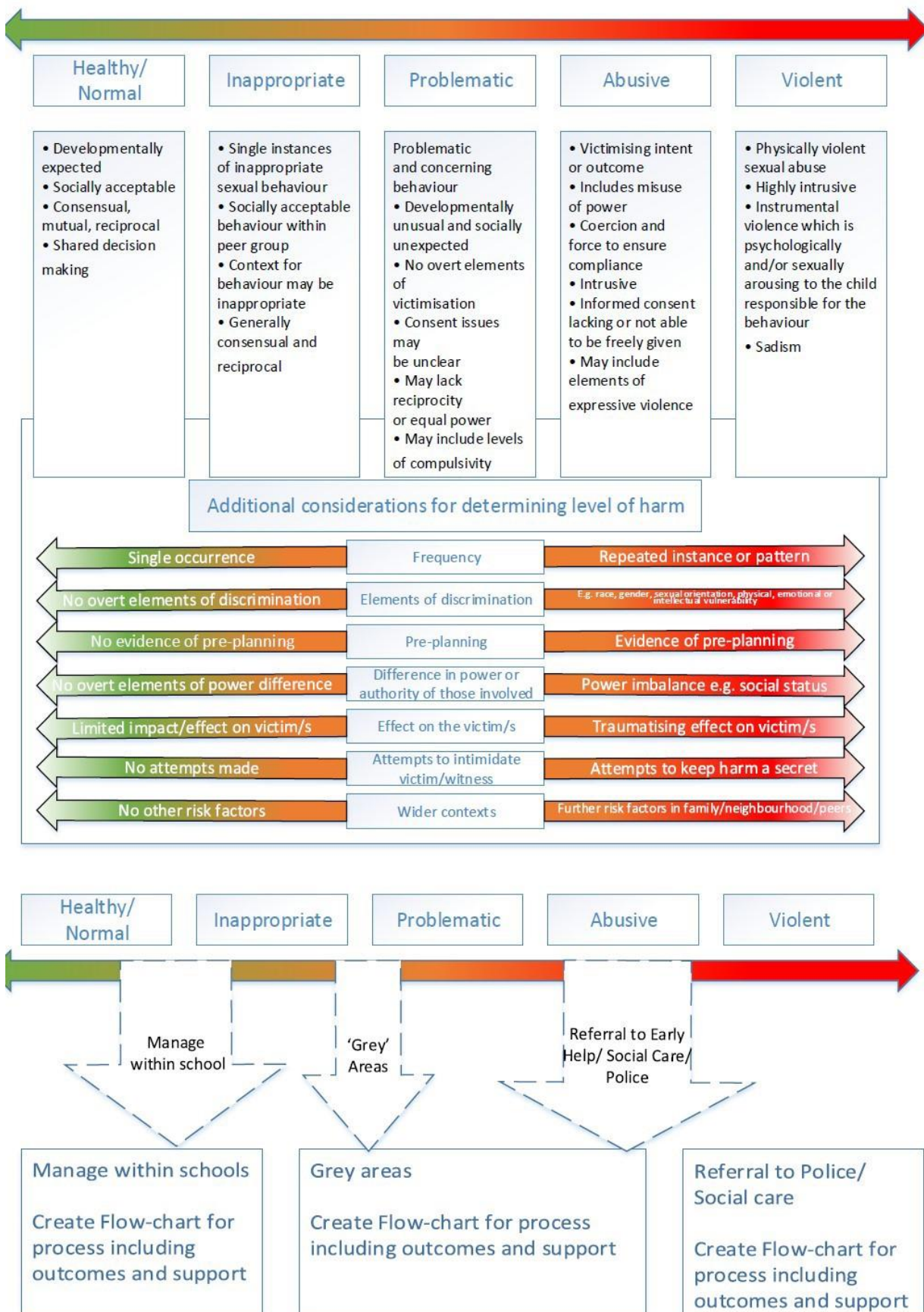
Child-on-child abuse can and will occur on any site even with the most robust policies and support processes. It is important to develop appropriate strategies to proactively prevent child-on-child abuse.

Darul Uloom London school has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. There is a strong and positive PSHE/RSHE curriculum that tackles such issues as prejudiced behaviour and gives children an open

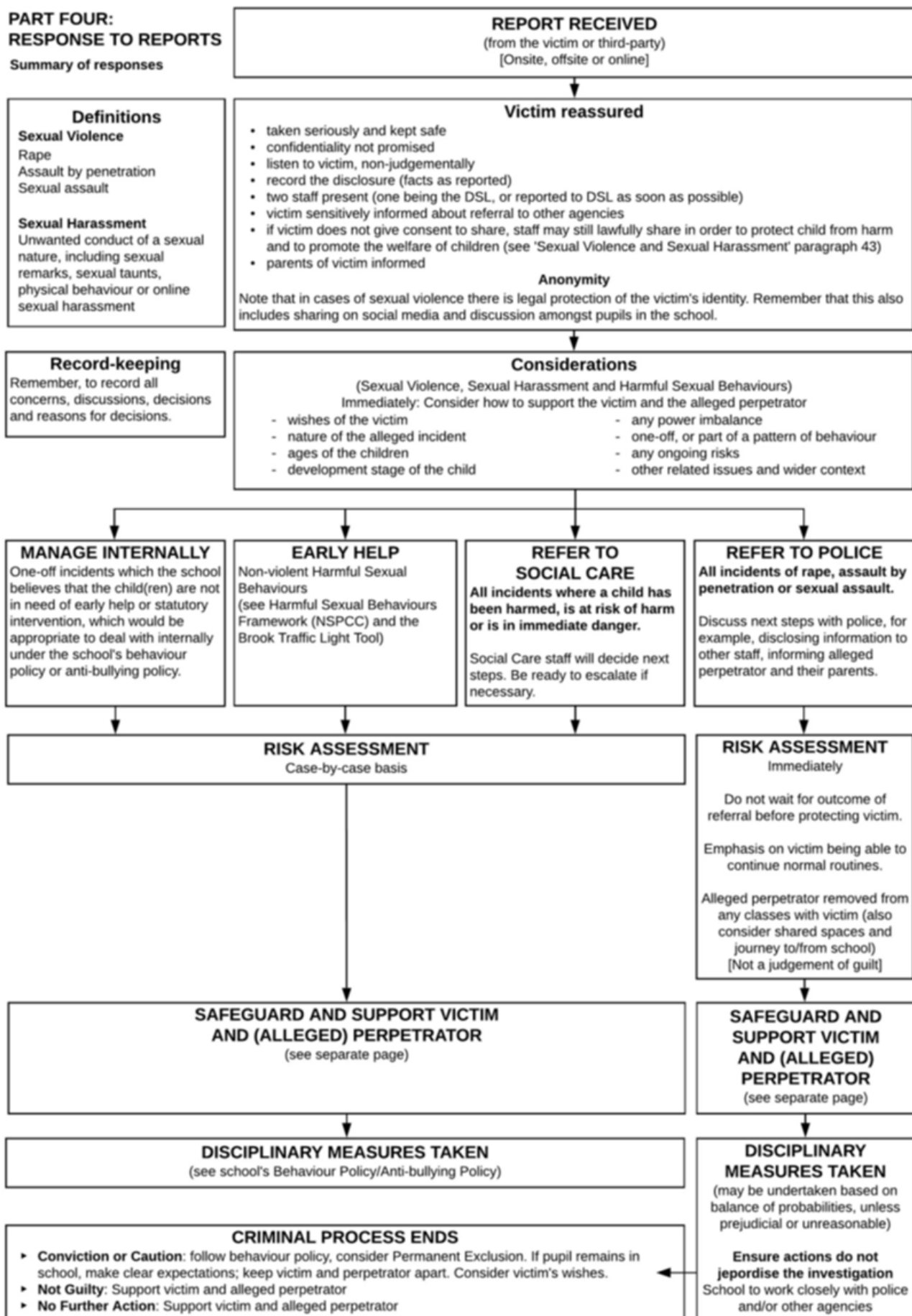
forum to talk things through rather than seek one on one opportunities to be harmful to one another. The school makes sure that 'support and report' signposting is available to young people.

Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff will consider each issue and each individual in their own right before taking action.

Young people are part of changing their circumstances and, through school council and pupil voice for example, we encourage young people to support changes and develop 'rules of acceptable behaviour'. We involve pupils in the positive ethos in school; one where all young people understand the boundaries of behaviour before it becomes abusive.



**PART FOUR:
RESPONSE TO REPORTS**
Summary of responses



RADICALISATION AND THE PREVENT DUTY

The school has a legal duty to have due regard to the need to prevent people from being drawn into terrorism. The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The school is committed to providing a safe space in which children and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. Any instance where a pupil/ family member of a pupils shows signs of radicalisation a risk assessment will be carried out. The school has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas".

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism".

Terrorism: "is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause."

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect susceptible (vulnerable) people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. which may include the designated safeguarding lead (or deputy) making a Prevent referral. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting susceptible (vulnerable) people from being drawn into terrorism (2015) notes the following: There is no single way of identifying who is likely to be susceptible (vulnerable) to being drawn into terrorism. Factors that may have a bearing on someone becoming susceptible (vulnerable) may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible (vulnerable) to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible (vulnerable) to being drawn into terrorism and consider the appropriate support required.

Referrals to Channel will be made if there is reason to believe that someone may have been radicalised or maybe at risk of radicalisation. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required. An individual's engagement with the programme is entirely voluntary at all stages.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;

- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups, or slogans, of Isis, Al Shabab, Al Qaida or other terrorist groups);
- Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others
- Dehumanising people by using derogatory terms or other means.

Specific safeguarding issues of which staff should be aware are: a child missing from education, a child missing from home or care, child sexual exploitation (CSE), bullying including cyberbullying, hate, domestic violence, drugs, fabricated or induced illness, faith abuse, gangs and youth violence, gender based violence/violence against women and girls (VAWG), mental health, private fostering, sexting, relationship abuse and trafficking.

The trustees will ensure that there is an appropriate safeguarding response to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. The government's missing children and adult's strategy and the department's children missing education guidance will be used as points of reference in that regard.

CHILDREN WHO ARE ABSENT FROM EDUCATION, and CHILDREN MISSING EDUCATION (CME)

The trustees will ensure that attendance, absences and exclusions are closely monitored and that there is an appropriate safeguarding response to a child going missing from education particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and Child Marriage, and or forced marriage.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The trustees will ensure that the school's response to persistently or unexplained absent pupils and children missing or unexplained education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community

The DSL will monitor attendance, unauthorised absences and exclusions and take appropriate action including notifying the local authority. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation, county lines and forced marriage. The school is aware that attendance can be impacted by poor mental health as per KCSIE 2025. We would work in-line with the "The Working Together To Improve School Attendance (2024 guidance which is statutory, no longer advisory), we will continue to collaborate with Local Authority, Children Services where absence raises safeguarding concerns. Appropriate support will be provided in these instances.

The school follows the Safeguarding Children Practice Guidance; [Working together to improve school attendance](#), Children Missing from School from the London Child Protection Procedures and will refer all cases of concern to their Education Welfare Officer (EWO) or Attendance Lead.

Where parents inform our school that they wish to 'home educate' their child, our school will inform the Local Authority in accordance with the Elective Home Education Procedure.

In line with strengthening ties between the local authority and Bromley school in Safeguarding our young people, Bromley Education Welfare Service have introduced a Single Point Of Contact (SPOC) for all schools.

The school SPOC is Andrea Butcher
Andrea.butcher@bromley.gov.uk
020 8313 4037

The government's missing children and adult's strategy and the department's children missing education guidance will be used as a point of reference in that regard.

The school will work with the Bromley Virtual School to promote and champion the attendance, attainment and progress of children in kinship care arrangements. Since September 2024, the Virtual School has a non-statutory responsibility to promote the education of children in kinship care arrangements regardless of whether the children have been previously looked after by the Local Authority. Kinship Care is any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term. Examples of kinship care arrangements include Private Fostering Arrangements, Special Guardianship Order, and Child Arrangements Order.

Alternative Provision Providers

When the school places a pupil with an alternative provision provider in the best interests of the child, the school will continue to be responsible for the safeguarding of that pupil and will take action to be satisfied that the placement meets the pupil's needs. In accordance with KCSIE and the statutory guidance Arranging Alternative Provision, as a minimum, the school will have a written record of where a child is based during school hours, the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The school will regularly review at least half termly the alternative provision placements to obtain assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the school will immediately review the placement and consider termination, if necessary, unless or until those concerns have been satisfactorily addressed.

In fulfilment of its safeguarding responsibilities towards the pupil placed there, the school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the Alternative Provider, for example, the checks that schools would otherwise perform on their own staff. The school will also obtain written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes) so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

ROLES AND RESPONSIBILITIES

THE ROLE OF THE BOARD OF TRUSTEES

The Trustees takes seriously their responsibility under section 157 of the Education Act 2011 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

- Trustee will have a senior board level (or equivalent) lead to take leadership responsibility for their school's or college's safeguarding arrangements (contact details for the lead trustee can be found in section 5 of this document).
- Trustees will ensure there are appropriate policies and procedures (in addition to this policy, policies for staff behaviour, whistleblowing, information sharing and risk management) in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- That all systems and processes should operate with the best interest of the child at their heart and ensure the child's wishes and feelings are taken into account when determining actions to take and what services to provide.
- To ensure that safer recruitment procedures are followed and that all appropriate checks are carried out on all staff. To ensure the school has a Designated Lead who is a member of the Senior Management Team and has undergone relevant training.
- To provide sufficient resources to enable appropriate training to all staff at regular intervals.
- To ensure children are taught about safeguarding, including online and relationships and Sex Education (RSE) through teaching and learning opportunities, as part of providing a broad and balanced curriculum and to ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- To ensure appropriate filters and appropriate monitoring systems are in place on school devices and the school networks² (taking into consideration age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks) and regularly review their effectiveness.
- To ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities set out in Part 1 of KCSIE 2025.
- To ensure that the Safeguarding Policy and procedures are consistent with Bromley Safeguarding Children Board (BSCB/Bromley safeguarding partnership arrangement) requirements and are reviewed annually.
- To ensure that the Principal and DSL work with local safeguarding partners as outlined by Bromley safeguarding partnership arrangements,
- To ensure that the school has procedures for dealing with allegations of abuse against members of staff that comply with BSCB/Bromley safeguarding partnership arrangements, Disclosure and Barring Service and the Teaching Regulation Agency.
- To ensure that school staff have due regard to data protection principles as outlined by the DPA and GDPR 2018 (DPA/UKGDPR).
- Governing bodies and proprietors will ensure that all trustees receive appropriate safeguarding and child protection (including online) training
- This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated."
- The Trustees will ensure that the school contributes to inter-agency working in line with statutory guidance (Working together to safeguard children). This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. The school will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

² See DfE Guidance: [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/meeting-digital-and-technology-standards-in-schools-and-colleges-filtering-and-monitoring-standards-for-schools-and-colleges-guidance) and [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/meeting-digital-and-technology-standards-in-schools-and-colleges-cyber-security-standards-for-schools-and-colleges-guidance)

The Trustee with particular responsibility for safeguarding is responsible for liaising with the DSL over all matters regarding safeguarding issues. The role is strategic rather than operational and he will not be involved in concerns about individual pupils. The Trustee with particular responsibility for Safeguarding will liaise with the DSL to produce a termly report for the Trustees. The Safeguarding Policy will be reviewed by the Trustees to ensure that all procedures have been discharged with efficiency and to ensure swift remediation of any deficiency in policy or procedures.

THE ROLE OF THE PRINCIPAL

- To understand procedures set out by the Bromley Safeguarding Children's Board and the role of the Designated Safeguarding Lead
- To ensure that the Safeguarding Policy and procedures are understood and implemented by all staff
- To ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding children
- To monitor the effectiveness of the policy and procedures and liaise with the designated safeguarding lead over amendments
- To ensure that the Designated safeguarding Lead receives sufficient support, training, time and resources to carry out his role effectively
- To ensure that all staff know and are alert to possible signs of abuse and know what to do if they have any concerns or suspicions
- To be aware of any off-roll notification should there be safeguarding concerns and to follow this up in conjunction with the Designated Safeguarding Lead and, if applicable, with the Bromley Safeguarding Children's board
- To create a safe environment and a caring ethos within the school
- To make parents aware of the school's Safeguarding Children Policy
- Ensuring the school effectively monitors, if any, children who have been identified as "at risk"
- Providing guidance to parents, children and staff about obtaining suitable help

THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

Trustee to ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety and understanding roles and responsibilities in relation to filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. The DSL is to be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads

There will be at least one named deputy designated safeguarding lead. Any deputies must be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
 - liaise with the principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
 - as required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff, IT Technicians, and SENCOs or the named person with oversight for SEN on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff. Training
 - help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training.

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

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school’s child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Trustees regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding partnership arrangements;
- Where children leave the school (or if appropriate before the child leaves school to support transition), the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- During term time the designated safeguarding lead (or a deputy) should always be available for staff in the school to discuss any safeguarding concerns. The school will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities

Additionally, following a report of sexual violence, the designated safeguarding lead (or deputy) should make an immediate risk and needs assessment, considering the victim, the alleged perpetrator as well as all other children (and if appropriate adult students and staff).

Tazmul Islam Rahman is the Designated Safeguarding Lead. The Deputy Designated Safeguarding Lead is Redwan Hussain. All have attended/completes a Level 3 Child Protection Course. They are fully trained for this role in child protection by completing the Designated Safeguarding Lead training

THE ROLE OF THE STAFF

All members of staff should be aware of the four key steps to follow to help identify and respond appropriately to possible abuse and/or neglect:

- Be alert – to be aware of signs of abuse and neglect and to understand the procedures set out in local multi-agency safeguarding arrangements
- Question behaviours – to be aware if something seems unusual and try to speak to the child alone, if appropriate to seek further information
- Ask for help – discuss concerns with the Designated Lead
- Refer – make a referral to the BSCB. This would usually be made by the Designated Lead but can be made by anyone. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

To be aware of the contents of the Safeguarding Children policy and procedures and the identity of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead

- To enquire from the DSL any matters that are not understood in Part 1 of KCSIE 2025
- To sign confirming that they have read and understood the safeguarding policy, staff code of conduct, behaviour policy, the school's child missing protocols, the booklet 'What To Do if You're Worried A Child is Being Abused' and part 1 of keeping children safe in education (2022)
- To have a responsibility to provide a safe environment in which children can learn
- To set a good example by conducting themselves appropriately and maintaining suitable standards of conversation and interaction with and between pupils

- To be prepared to identify children who may benefit from early help, providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the designated safeguarding lead.
 - To support other agencies and professionals in an early help assessment if required
 - To be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
 - To follow the referral processes set out in KCSIE 2025 if there is a concern about a child's welfare.
 - To help pupils understand how to keep themselves safe and manage risk through PSHCE discussions and through all aspects of school life
 - To foster a culture of trust between adults who work at the school and children who attend
 - To undertake regular updated (at least annually) training to provide them with relevant skills and knowledge to safeguard children effectively
 - To know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.
 - To identify children at risk of being drawn into terrorism and to challenge extremist ideas which can be used to legitimize terrorism and are shared by terrorist groups
 - To build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views
 - To be aware of the types of abuse and neglect so that they are able to identify cases of children who may need help or protection.
 - To be alert of persistent absenteeism or unexplained of any pupils and report concerns to the Designated Lead should it be felt there may be safeguarding concerns
 - To be open, accepting and ready to listen to a pupil and to follow the procedures outlined in this policy in the event of a disclosure.
 - To complete a concern form signed and dated
 - All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse.
 - All staff should recognise that children are capable of abusing their peers. All staff should be clear about the school's procedure with regard to child-on-child abuse.
 - Members of staff are required to 'self-declare' if there are any changes to their own criminal record, have links with any extremist groups or if there is a change in their personal circumstances.
- The Teachers' Standards state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible. The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

If, after a referral, the child's situation does not appear to be improving, the designated safeguarding lead (or the person who made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves. Local safeguarding partnership arrangements will have escalation procedures that can be followed.

All verbal communication should be written down at the earliest opportunity.

If early help is appropriate, the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

If in any doubt, staff are encouraged to always speak to the designated safeguarding lead (or deputy) who will provide relevant information, advice and guidance.

Note: All information and action taken, including the decision made will be fully documented and all referrals to Social Services will be accompanied by a standard referral form.

RESPONDING TO DISCLOSURES

DISCLOSURES

Members of staff may suspect a case of abuse from a variety of sources:

- a pupil discloses to them personally
- from behaviour of, or marks on, the pupil (e.g. bruises, welts, lacerations, abrasions)
- indications through schoolwork
- a pupil informs them that they know or suspects that another pupil is being abused
- another third party informs them that they know or suspects that a pupil is being abused

If a pupil starts to disclose, the following procedures are essential:

Reassure the pupil has a right to tell and is not to blame. It is helpful to the pupil if the adult is able to communicate something of the following: 'You're not to blame, it's not your fault'

'You're very brave to have told someone'

Confidentiality: Do not promise confidentiality, explain that you have to make sure that the pupil is safe and may need to ask other adults to help you to do this. Referrals may have to be made in order to safeguard the pupil.

Ensure that any questions that need to be asked to clarify understanding are as open as possible and do not lead the pupil to tell you what she or he wants to and no more. The pupil may have to disclose to a specialist later and too much detail now may interfere with later investigations.

Keep any suspicions confidential and not discuss them with anyone other than those mentioned above

Make a written note of the discussion as soon as possible and at most within twenty-four hours to give to the Designated Lead. Note time, date, place, people present and what was said. Records should be precise; the notes may be needed in subsequent court proceedings. All notes should be signed.

Listen carefully and take the allegation seriously. When the pupil has finished, make sure that he feels secure; explain what you are going to do next.

Report: make notes, including the date and time of the interview and sign them. It is important to record as much as you can remember using the pupil's own words. Write facts and information only, taking care to avoid opinion. A specific safeguarding incident/concern form is an appendix to this policy. This should be delivered in person to the DSL's office and the DSL should be notified. Further copies are available from the DSL. Staff are not required to investigate further but may be required to support and monitor the student in the future.

Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. The pupil should only be examined by an appropriate doctor.

Refer: Make a referral to the relevant children's services (where allegations relate to incidents that have happened in the child's home, or home authority, a referral to that local authority children's services will be made; where any abuse takes place in the school or surrounding areas, the initial referral will be made to Bromley children's services. This would usually be made by the Designated Safeguarding Lead but can be made by anyone. Normally, when there are safeguarding concerns, the Designated Lead will contact parents before making a referral to Children's Social Care Services. However, there are some exceptions; see below.

Physical injury, emotional abuse or neglect:

- The Designated Lead will contact Children's Social Care Services. If there has been a deliberate injury or where there are concerns about the child's safety, the child's parents should not be contacted before first consulting with social services
- Where emergency medical attention is necessary it will be sought immediately. The Designated Lead should inform the doctor of any suspicion of abuse
- If a referral is being made without the parent's knowledge and non-urgent medical treatment is required, social services should be informed. Otherwise, speak to the parent and suggest medical attention should be sought for the child.
- If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention should be requested.

Sexual abuse:

- The Designated Lead will contact Children's Social Care Services or Police
- The Designated Lead will not speak to the parents
- Under no circumstances should the Designated Lead, or any other member of the school, attempt to carry out any investigation into the allegations or suspicions of sexual abuse. The role of the Designated Lead is to collect the exact details of the allegations or suspicion and to provide this information to the child protection agencies
- The member of staff will not be approached at this stage unless it is necessary to ensure the immediate safety of children
- The DSL may need to clarify any information regarding the allegation; however, no person will be interviewed at this stage.

Within 24 hours the DSL will contact the children's services / Children and families Hub (MASH) in accordance with the relevant local authority procedures to determine whether the referral is to take place. No member of the school staff shall conduct an investigation concerning child abuse. This will be done by Social Services and/or the police.

DEALING WITH ALLEGATIONS OF ABUSE AGAINST STAFF, INCLUDING SLT, VOLUNTEERS AND CONTRACTORS

All members of staff at the School should have an understanding of Child Protection and Safeguarding issues and should appreciate the importance of their vigilance. The School has a Whistle blowing Policy which is readily available and is part of the induction process. Where an allegation or complaint is made against any member of staff, including that of any member of the SLT or volunteer, the matter should be reported immediately to the Principal, or in his absence to the Chair of Trustees. Where appropriate, the Principal will consult with the DSL – if appropriate - and the allegation will be discussed immediately with the LADO before further action is taken.

Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the Chair of Trustees, or in his absence the Safeguarding Trustee, without first notifying the Principal. Again, the allegation will be discussed immediately with the LADO before further action is taken.

In the event of any conflict of interest, the case will be escalated to the Chair of the Board of Trustees who will then follow the procedure accordingly.

Contact details for the Local Authority Designated Officer (LADO) for Bromley:

Contact Name: Ms Gemma Taylor

Telephone: 0208 461 7775 or 0208 313 4325.

Email: lado@bromley.gov.uk – gemma.taylor@bromley.gov.uk

If any allegation of abuse is made against a member of staff, the Bromley safeguarding partnership procedures will be followed and we shall have regard to the guidelines on practice and procedure given in Part 4 of the DfE statutory guidance Keeping Children Safe in Education (2022).

Allegations that might indicate that a person is unsuitable to continue to work with children are where a person has:

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

The procedures for dealing with allegations need to be applied with common sense and judgement. It is essential that any allegation of abuse made against a member of staff is dealt with very quickly, in a fair and consistent way that provides effective protection for the pupil and at the same time supports the person who is the subject of the allegation.

The School understands its duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action. However, where a strategy discussion is required, or police or children's social care services need to be involved, this will not happen until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. The individual will be advised that they may confide in a colleague or counselling etc. for support.

There will be a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. In the event that an employee is suspended, they will be kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, this will not happen until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information considered in reaching a decision cannot normally be disclosed, but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 163). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

In response to an allegation, all other options should be considered before suspending a member of staff: suspension should not be the default option and the DSL will seek advice from the LADO in this regard. An individual should be suspended only if there is no reasonable alternative. In cases where the school is made aware that the Secretary of State has made an interim prohibition order, it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency (TRA) investigation. If a suspension is deemed appropriate, the reasons and justification should be recorded by the employer and the individual notified of the reasons. There will also be a record made of what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details and offered the necessary support.

When a complaint is made against a member of the boarding staff who lives within a boarding house, an alternative arrangement will be made for them to live elsewhere during the investigation process, and alongside this alternative arrangement will be made for staffing the boarding house.

Any employee who becomes aware of a possible allegation or concern of a child protection nature must take immediate steps to ensure that the matter is reported to the Designated Safeguarding Lead or in his absence to the Deputy Safeguarding Lead. It is important that the member of staff reporting the concern acts quickly. An investigation may be impeded if a concern is reported late.

Many cases may well not warrant the consideration of either a police investigation or enquiries by the local authority. In these cases, local arrangements should be followed to resolve cases without delay. However, some rare allegations will be so serious they require immediate intervention by the local authority, in which case the following guidelines are followed:

- The DSL should consult the local authority Safeguarding Children Referral and obtain written details of the allegation, signed and dated, from the person who received the allegation (not the pupil).
- The DSL should record any information about dates, times, locations and names of potential witnesses.
- An initial assessment of an allegation should be made by the duty officer and the DSL to judge whether there is a need for immediate action to protect the pupil, the allegation is demonstrably false, there has been inappropriate behaviour or poor practice that can be dealt with through the school's disciplinary procedures.
- Where a referral is made because the pupil has suffered or is likely to suffer significant harm or the alleged abuse is a criminal offence, the local authority procedures will be followed. The local authority will be informed of all allegations and be invited to discuss the allegation with the DSL to confirm details and the best way of informing parents (if they are not already aware).
- The DSL will inform the alleged about the allegation after consulting the LADO
- If the allegation is not false or unfounded and there is cause to suspect a pupil is suffering, or likely to suffer significant harm, a strategy meeting will be convened
- The LADO may hold meetings with other agencies e.g. the police, if it is judged that the threshold of significant harm has not been reached.
- The DSL will make the decision whether or not to suspend, given the risk to the pupil and where the allegations warrant investigation by police.
- Staff are permitted to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour. This should be considered if the allegation is about physical contact.
- In cases where other interagency involvement is not required, the LADO will discuss with the DSL what steps to take. The DSL may decide to take no further action, to dismiss the person or not to use that person's services in the future.
- Where further investigations are required before deciding how to proceed, the DSL will decide, with the LADO, who will investigate; this may be an independent investigator provided by the Local Authority.
- Outcomes of allegations against members of staff may be defined as Substantiated, False, Malicious, Unfounded or Unsubstantiated.
- If an allegation is not substantiated and the person returns to work, the school will support that person through offering, for example, a phased return or a mentor.

Allegations that are found to be malicious should be removed from personnel records; and any that are unsubstantiated, are unfounded, or malicious should not be referred to in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference

For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, will be kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The record will be retained as per the school's data retention policy.

If an allegation is shown to be deliberately invented or malicious the principal should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they will be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the school to deal with it, although if there are concerns about child protection, the DSL will discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the school will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing will be held within 15 working days.

'Settlement agreements' will not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

There will be three possible types of investigation:

1. By Social Services and the Police under Section 47 of the Children Act 1989
2. By the Police under criminal law
3. By the School in line with staff disciplinary procedures

The Local Authority is responsible for managing child protection issues and any allegations against a member of staff must be reported immediately to the Local Authority Designated Officer. This initial consultation will determine whether the allegation reaches the threshold of significant harm to justify a referral to Social Services. In cases of serious harm, the police will be informed from the outset.

If the consultation discussion determines that the allegation does meet the criteria for referral to social services as a child protection concern, the Local Authority Designated Officer will provide support to the school in making the referral and throughout the subsequent process as required. Then the LADO will discuss with the school whether to report to the Disclosure and Barring Service (DBS) at the earliest opportunity of leaving the school, any person whose services are no longer used because he or she is considered unsuitable to work with children. The school will also consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and where a prohibition order may be deemed appropriate.

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. (KCSIE 2025)

Should it be determined in the consultation discussion that the Allegation does not meet the threshold for a child protection referral to social services, then the Local Authority Designated Officer will advise on further action that may be taken by the school in investigating the matter internally in line with the staff disciplinary procedures.

PLEASE NOTE IMPORTANT CHANGE TO LADO CONTACT

Starting on the **24th January 2024**, we are moving to a portal referral mechanism that will help streamline information we receive concerning children and young people. Therefore, all LADO referrals of allegations against adults who work or volunteer with children that meet the criteria i.e.:

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

Can be referred via the portal link below:

[LADO Referral \(bromley.gov.uk\)](https://bromley.gov.uk/lado-referral)

Initially you will be required to create an account via the portal, this instruction video will take you through how to do so <https://youtu.be/nREC8f3c5uU>

This is an instructional video which covers how to complete and submit a referral to Bromley Children's Social Care via the Children, Young People and Families Portal used by the London Borough of Bromley. https://youtu.be/T3_rkbFkyBM.

In line with the changes to the referral process, we will also be streamlining LADO Consultations, which will now need to be submitted in writing via the following link:

[LADO Consultation Form](#)

Due to these changes, the LADO phone will no longer be accepting calls, however, if it is absolutely necessary to speak to someone immediately, then please contact LADO Business Support, Marie Webber on 020 8461 7942 who will be able to triage your call.

The LADO will review online referrals and consultations and respond to matters depending on urgency. The LADO will endeavour to provide a response within 24 hours of a form being submitted and booking telephone consultations can also be requested via this process if you provide your availability.

For general education safeguarding advice and support, please contact Libby Kember on 0208 313 4665 or email Libby.Kember@bromley.gov.uk as LBB Education Safeguarding Officer.

For Procedures and Information forms use links: [LADO Procedures](#) & [LADO Staff & Volunteer Brochures](#)

THE INITIAL RESPONSE TO AN ALLEGATION

Where the school identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the school should contact children's social care and as appropriate the police immediately as per the processes explained earlier in this policy.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in earlier in this policy.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, the school will:

- apply common sense and judgement;
- deal with allegations **quickly**, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

The case manager should ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made). Before contacting the LADO, the case manager should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:

- was the individual in the school at the time of the allegations?
- did the individual, or could they have, come into contact with the child?
- are there any witnesses? and,
- was there any CCTV footage?

These are just a sample of example questions. The case manager should be familiar with what initial information the LADO will require (see Appendices Waltham Forest LADO Referral Form).

When to inform the individual of the allegation: The case manager consider carefully on a case by case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance

Working Together to Safeguard Children. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found earlier in this policy and on the GOV.UK site for Use of reasonable force in schools.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the case manager should seek advice on the next steps from the LADO.

No further action

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

Further enquiries

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff.

Where there is a lack of appropriate resource within the school, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator. Many local authorities provide for an independent investigation of allegations for schools that are maintained by the local authority, often as part of the HR/personnel services that schools can buy in from the authority. The case manager should also ensure they secure the services of a person who is independent of the school.

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. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO should provide advice and guidance to the school when considering allegations against adults working with children.

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

The School understands its duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action. However, where a strategy discussion is required, or police or children's social care services need to be involved, this will not happen until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. The individual will be advised that they may confide in a colleague or counselling etc. for support.

There will be a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. In the event that an employee is suspended, they will be kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, this will not happen until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information considered in reaching a decision cannot normally be disclosed, but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 163). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

Any employee who becomes aware of a possible allegation or concern of a child protection nature must take immediate steps to ensure that the matter is reported to the Designated Safeguarding Lead or in his absence to the Deputy Safeguarding Lead. It is important that the member of staff reporting the concern acts quickly. An investigation may be impeded if a concern is reported late.

Many cases may well not warrant the consideration of either a police investigation or enquiries by the local authority. In these cases, local arrangements should be followed to resolve cases without delay. However, some rare allegations will be so serious they require immediate intervention by the local authority, in which case the following guidelines are followed:

- The DSL should consult the local authority Safeguarding Children Referral and obtain written details of the allegation, signed and dated, from the person who received the allegation (not the pupil).
- The DSL should record any information about dates, times, locations and names of potential witnesses.
- An initial assessment of an allegation should be made by the duty officer and the DSL to judge whether there is a need for immediate action to protect the pupil, the allegation is demonstrably false, there has been inappropriate behaviour or poor practice that can be dealt with through the school's disciplinary procedures.
- Where a referral is made because the pupil has suffered or is likely to suffer significant harm or the alleged abuse is a criminal offence, the local authority procedures will be followed. The local authority will be informed of all allegations and be invited to discuss the allegation with the DSL to confirm details and the best way of informing parents (if not already aware).
- The DSL will inform the alleged about the allegation after consulting the LADO
- If the allegation is not false or unfounded and there is cause to suspect a pupil is suffering, or likely to suffer significant harm, a strategy meeting will be convened
- The LADO may hold meetings with other agencies e.g. the police, if it is judged that the threshold of significant harm has not been reached.
- Staff are permitted to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour. This should be considered if the allegation is about physical contact.
- In cases where other interagency involvement is not required, the LADO will discuss with the DSL what steps to take. The DSL may decide to take no further action, to dismiss the person or not to use that person's services in the future.
- Where further investigations are required before deciding how to proceed, the DSL will decide, with the LADO, who will investigate; this may be an independent investigator provided by the Local Authority.
- Outcomes of allegations against members of staff may be defined as Substantiated, False, Malicious, Unfounded or Unsubstantiated.

'Settlement agreements' will not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

There will be three possible types of investigation:

1. By Social Services and the Police under Section 47 of the Children Act 1989
2. By the Police under criminal law
3. By the School in line with staff disciplinary procedures

The Local Authority is responsible for managing child protection issues and any allegations against a member of staff must be reported immediately to the Local Authority Designated Officer. This initial consultation will determine whether the allegation reaches the threshold of significant harm to justify a referral to Social Services. In cases of serious harm, the police will be informed from the outset.

If the consultation discussion determines that the allegation does meet the criteria for referral to social services as a child protection concern, the Local Authority Designated Officer will provide support to the school in making the referral and throughout the subsequent process as required. Then the LADO will discuss with the school whether to report to the Disclosure and Barring Service (DBS) at the earliest opportunity of leaving the school, any person whose services are no longer used because he or she is considered unsuitable to work with children. The school will also consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and where a prohibition order may be deemed appropriate.

Schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has

committed a listed relevant offence; and that the individual has been removed from working (paid including supply staff or unpaid) in regulated activity, or would have been removed had they not left. Should it be determined in the consultation discussion that the Allegation does not meet the threshold for a child protection referral to social services, then the Local Authority Designated Officer will advise on further action that may be taken by the school in investigating the matter internally in line with the staff disciplinary procedures.

UNSUBSTANTIATED, UNFOUNDED, FALSE OR MALICIOUS REPORTS

The definitions that will be used when we determine the outcome of an allegation are set out below:

- **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 of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if improvements can be made.

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

If an allegation is not substantiated and the person returns to work, the school will support that person through offering, for example, a phased return or a mentor.

Allegations that are found to be malicious should be removed from personnel records; and any that are unsubstantiated, are unfounded, or malicious should not be referred to in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference

If an allegation is shown to be deliberately invented or malicious the Head Teacher should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they will be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the school to deal with it, although if there are concerns about child protection, the DSL will discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the school will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing will be held within 15 working days.

For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, will be kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The record will be retained as per the school's data retention procedures.

Suspension

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and children's social care where they have been involved.

Where the case manager is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the school, the school should take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The case manager will decide on whether the individual should continue to work at the school, based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.

Based on advice from the school's HR provider and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location or working from home.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care or the police may give their view to the LADO but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager should give appropriate weight to their views. The power to suspend is vested in the proprietors who are the employers. However, where a strategy discussion, or initial assessment, concludes that there should be enquiries by the children's social care, and/or an investigation by the police, the LADO should canvass police and children's social care for views about whether the accused member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

CONFIDENTIALITY AND ANONYMITY

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

Our school will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR (DPA/UKGDPR) that applies.

Advice should be sought from the designated safeguarding lead (or deputy), who will consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will balance the victim's wishes against their duty to protect the victim and other children.

Where the designated safeguarding lead (or a deputy) go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will be explained to the victim and appropriate specialist support will be offered.

Additional information on confidentiality and information sharing is available at [Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners.](#)

As a matter of effective safeguarding practice we will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. If required we will provide a physical space for victims to withdraw.

LOW LEVEL CONCERNS

This section seeks to

- ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
- empower staff to share any low-level concerns with the Headmaster
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weaknesses in the organisation's safeguarding system.

This applies to **all** staff at Darul Uloom London School.

Defining a Low-Level Concern

A low-level concern is one that **does not** meet the harm threshold as stated in the school's Safeguarding Policy. That is, when anyone working in a school (including volunteers, supply staff and contractors) has:

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

Responses and actions to behaviours that may meet the harm threshold are contained specifically within the policy, 'Allegations Regarding Staff (or volunteers)'. These should be reported to the Principal without delay. A low-level concern is **any** concern – **no matter how small**, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e. they *believe* it could be a concern) – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

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

Responsibilities of staff

It is important that **all** staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct 'Staff Handbook'. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for all and new staff.

It is crucial that **any** concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headmaster/Principal. This should be done without delay.

Where there are concerns/allegations about the Headmaster/Principal, this should be referred to the Chair of Trustees or The Trustee with overall responsibility of Safeguarding at the school, Mr. Mohammed Khan.

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the school's code of conduct and expectations, they self-refer to the Principal.

DEALING WITH LOW-LEVEL CONCERNS

All low-level concerns may be shared verbally with the Principal in the first instance, but must then be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Where the low-level concern is provided verbally, the Principal should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated.

Records will remain confidential in accordance with the school's Data Protection policies and GDPR (DPA/UKGDPR).

RESPONDING TO A LOW-LEVEL CONCERN

The Principal will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:

- (a) the threshold is met for a higher-level concern/allegation
- (b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- (c) There is other information which when taken into account leads to a higher-level concern/allegation.

Where the Principal is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Principal will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party, the Principal should collect as much evidence as possible by speaking:

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

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's HR manager.

Low level consultation form must be completed if you wish to:

- Report a Low Level Concern for logging
- Report a Professional Conduct Issue and receive advice
- Report an issue in an employee/volunteer's personal life which may impact their work
- Report a Crime in relation to an Employee/Volunteer
- Other

This form must be completed by the person with lead responsibility for managing allegations in the setting. For guidance, please see Chapter 7 of the London Child Protection Procedures.

[Consultation to Bromley's Local Authority Designated Officer \(LADO\) \(Page 1 of 2\)](#)

MONITORING OF LOW-LEVEL CONCERNS

The Principal will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- (a) the concern (or group of concerns) has been reclassified as a higher-level concern, or
- (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

ONLINE SAFETY, MONITORING AND FILTERING

We recognise that children's use of the Internet is an important part of their education however there are risks of harm associated with its use as the use of technology has become a significant component of many safeguarding issues. Technology often provides a platform that facilitates in the following way: child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

Darul Uloom London has an E-Safety / Online Safety policy that addresses how we minimise those risks in school and teach children how to stay safe when using the internet in their lives out of school; this information is shared with parents and carers so they can ensure online safety at home. We also recognise that all members of staff and volunteers must always be mindful of the need to follow our policy of acceptable use of our IT equipment. We use a software to monitor email interactions and keystrokes. The DSL and Headteacher are alerted to and check regularly possible abuse and grooming using the school network by this filter.

The Online Safety Act 2023 among other things makes cyberflashing, threatening communications and the promotion of self-harm criminal offences. Artificial Intelligence is the current technological innovation evolving with speed, which will benefit society including the education sector but also generate great risks and challenges compromising the safety of children, for example, Generative Artificial Intelligence is being misused to create sexualised images and videos of children especially girls. The School will use the Internet Watch Foundation's Professionals Guide: Understanding and Responding to AI-Generated Child Sexual Abuse Material and the IWF's Report and Remove Tool.

KCSIE categorises the breadth of online safety issues into four areas of risk, the four 'C's:

CONTENT: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, disinformation, misinformation, conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation and conspiracy theories.

CONTACT being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

CONDUCT: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

COMMERCE: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The school will deal with online safety incidents in accordance with the procedures outlined in both this policy and in associated school policies. The School is committed to reviewing and implementing its Online Safety policies to keep staff and pupils safe when using technology including the use of Artificial Intelligence.

We have a separate online safety policy for students and staff, this is a topic included as part of staff induction which is used to raise awareness of safety so that staff are fully informed to enable them to have an understanding of risk. This includes the school's approach on the use of mobile technology in the school.

Our effective approach to online safety empowers us as a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The Trustee

The Trustees have a duty of care for ensuring the safety (including online safety) of members of the school community, though the day-to-day responsibility for online safety will be delegated to the Designated Safeguarding Lead

The Head and (at least) another member of the Senior Leadership Team / Senior Management Team should be aware of the procedures to be followed in the event of a serious allegation of online abuse or breach of this policy being made against a member of staff.

The Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for all safeguarding and child protection matters at the School, including online safety, and supports all other staff in dealing with any child protection concerns that arise. The DSL is trained in online safety issues. When necessary the DSL will liaise with external agencies such as the Children's Single Point of contact and/or Police.

IT Network Manager

- The IT Network Manager is responsible for ensuring that:
- The School's technical infrastructure is secure and is not open to misuse or malicious attack
- The School meets required online safety technical requirements
- Users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- The filtering is applied and updated on a regular basis
- They keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- The use of the network is regularly monitored in order that any misuse or attempted misuse can be reported to the Head for investigation
- Monitoring software and systems are kept up to date.

Teaching and Support Staff

Teachers and support staff are responsible for ensuring that:

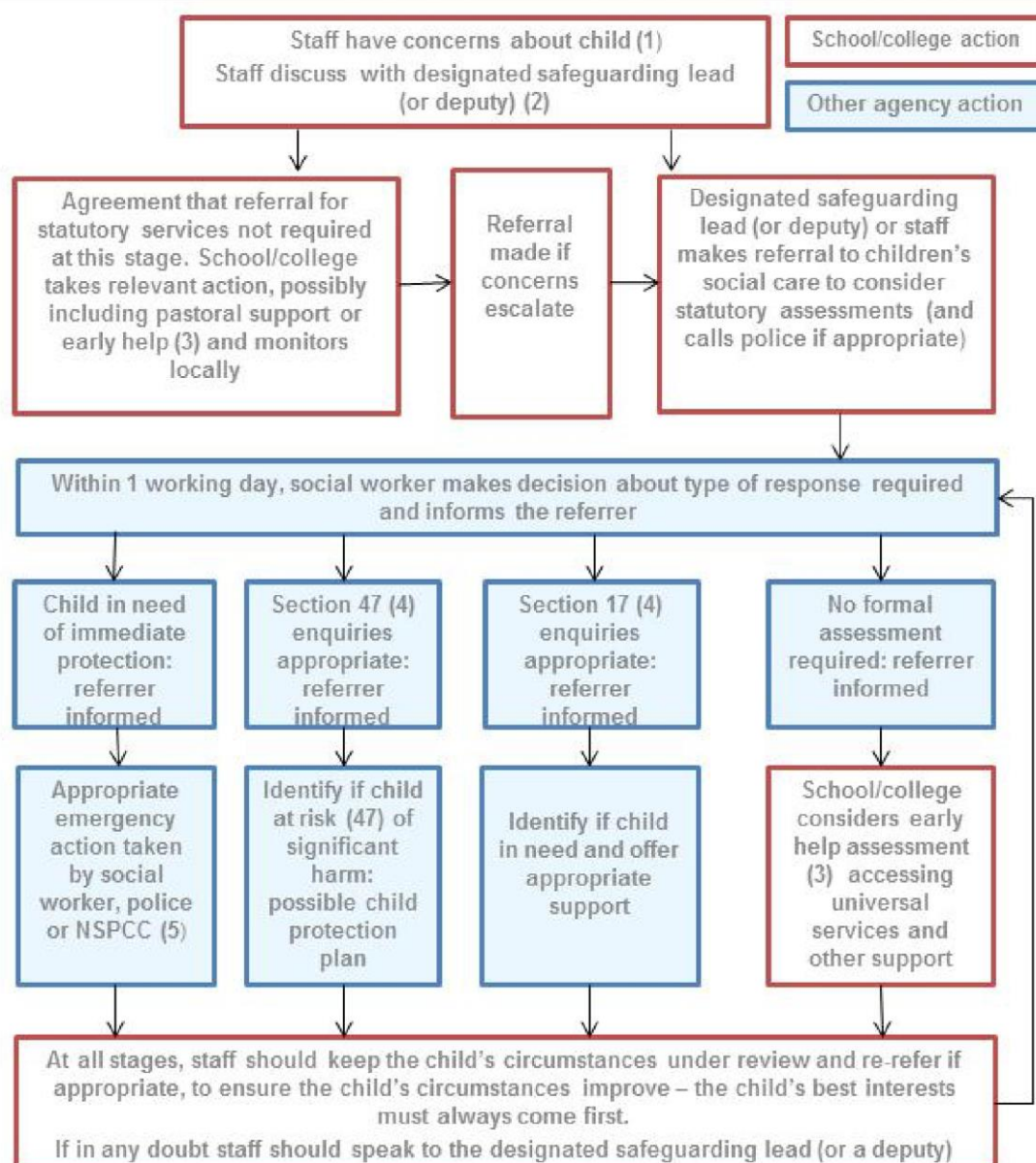
- They have an up-to-date awareness of online safety matters and of this online safety policy and practices
- They have read, understood and agreed to the IT Acceptable Use Policy
- They report any suspected misuse or problem to the DSL or the Headteacher for investigation
- All digital communications with other staff, pupils and parents are on a professional level
- They help pupils acquire a good understanding of research skills and the need to avoid plagiarism and uphold copyright law.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices.

Our pupils:

- Are involved in the development and review of this Policy through discussion in lessons and other forums, in an age appropriate way.
- Are responsible for using the School ICT systems in accordance with the Online Safety Agreement, which is signed when a pupil first joins the School and re-agreed periodically thereafter.
- Will be expected to know and understand policies on the use of IT/connected devices and cyber-bullying.

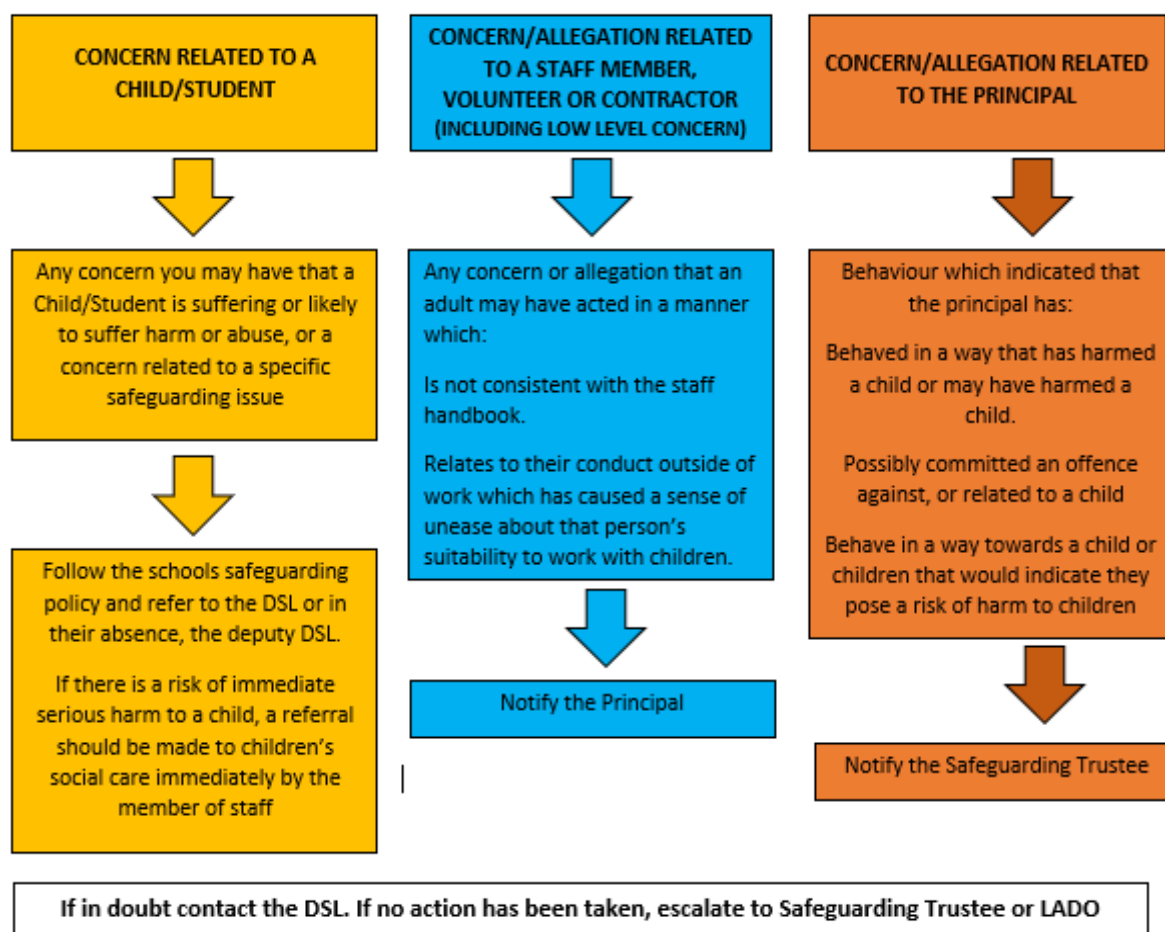
Should understand the importance of adopting good online safety practice when using connected technologies out of school and realise that the School's Online Safety Policy covers their actions out of school, where related to their membership of the School.

ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD



DESIGNATED SAFEGUARDING LEAD (DSL)	MR Redwan Hussain TELEPHONE: 020 8092 9265 / 07588658905
DEPUTY DESIGNATED SAFEGUARDING LEAD	Maulana Abubakr Baporia 020 8092 9265
DESIGNATED SAFEGUARDING TRUSTEE	MR MOHAMMED KHAN TELEPHONE: 07807031722
LOCAL AUTHORITY DESIGNATED OFFICER	MS GEMMA TAYLOR TELEPHONE: 0208 461 7775 or 0208 313 4325.

Reporting Concern Flowchart



USEFUL CONTACTS

Immediate Threat	
Telephone	999
Serious Concerns	
Telephone	101
Prevent	
Contact DfE helpline for non-emergency advice	0207 340 7264
Email	Counter-extremism@education.gsi.gov.uk
Bromley Common Assessment Framework Team	
Telephone	0208 461 7174
Address	Bromley Central Library, High Street, Bromley, BR1 1EX
Bromley Multi-Agency Safeguarding Hub (MASH)	
Telephone	0208 461 7379 / 7026 / 7373 / 7309
Email	mash@bromley.gov.uk
Address	1st Floor St Blaise Building, Civic Centre, Stockwell Close, Bromley, BR1 3UH
Female Genital Mutilation (FGM)	
FGM Helpline Contact	0800 028 3550
Email	fgmhelp@nspcc.org.uk
NSPCC Abuse Helpline	
NSPCC helpline	0800136663
Email	help@nspcc.org.uk
Chair of Trustees	Mr. Ismail Maljee - dultrustees@darululoomlondon.co.uk
Darul Uloom School Safeguarding Team	
Trustee with lead responsibility for safeguarding	Mr Mohammed Khan
Email	m.khan@darululoomlondon.com
Designated Safeguarding Lead	Mr Redwan Hussain
Telephone	020 8092 9262
Mobile	
Email	safeguarding@darululoomlondon.com
Deputy Designated Safeguarding Lead	Mr Abubakr Baporla
Telephone	020 8092 9265
Mobile	
email	abubakr.baporla@darululoomlondon.com
Local Authority Designated Officer	
Contact – Team Manager	Ms Gemma Taylor
Telephone	0208 461 7775 or 0208 313 4325
Email	lado@bromley.gov.uk – gemma.taylor@bromley.gov.uk



DARUL ULOOM LONDON

SAFEGUARDING INCIDENT/CONCERN FORM

Pupil/Child Name	Date of Birth (if not know, please put child's age or year up)
Name and position of individual completing form	
Date of incident/concern	
Details of incident. Please include as much information as possible, including who, what, where and when.	
Any other relevant information such as witnesses, or any immediate action taken	
Signature of individual completing this form:	Date and time form completed:
Would you like feedback about your concern? (Yes or No)	
Signature of DSL	Date and Time form received by DSL

PLEASE CONTINUE ON A SEPARATE SHEET IF NECESSARY. ONCE COMPLETE, PLEASE SUBMIT THIS FORM TO TAZMUL ISLAM RAHMAN (DSL) OR IN HIS ABSENCE REDWAN HUSSAIN (DEPUTY DSL)

MANAGING ALLEGATIONS MADE AGAINST ADULTS

<https://bromleysafeguarding.org/articles.php?id=604>

PLEASE NOTE IMPORTANT CHANGE TO LADO CONTACT

Starting on the **24th January 2024**, we are moving to a portal referral mechanism that will help streamline information we receive concerning children and young people. Therefore, all LADO referrals of allegations against adults who work or volunteer with children that meet the criteria i.e.:

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

Can be referred via the portal link below:

[LADO Referral \(bromley.gov.uk\)](https://bromley.gov.uk)

Initially you will be required to create an account via the portal, this instruction video will take you through how to do so <https://youtu.be/nREC8f3c5uU>

This is an instructional video which covers how to complete and submit a referral to Bromley Children's Social Care via the Children, Young People and Families Portal used by the London Borough of Bromley. https://youtu.be/T3_rkbFkyBM.

In line with the changes to the referral process, we will also be streamlining LADO Consultations, which will now need to be submitted in writing via the following link:

[LADO Consultation Form](#)

Due to these changes, the LADO phone will no longer be accepting calls, however, if it is absolutely necessary to speak to someone immediately, then please contact LADO Business Support, Marie Webber on 020 8461 7942 who will be able to triage your call.

The LADO will review online referrals and consultations and respond to matters depending on urgency. The LADO will endeavour to provide a response within 24 hours of a form being submitted and booking telephone consultations can also be requested via this process if you provide your availability.

lado@bromley.gov.uk.

For general education safeguarding advice and support, please contact Libby Kember on 0208 313 4665 or email Libby.Kember@bromley.gov.uk as LBB Education Safeguarding Officer.

For Procedures and Information forms use links: [LADO Procedures](#) & [LADO Staff & Volunteer Brochures](#)

HOW TO REFER A CHILD

<https://www.bromleysafeguarding.org/articles.php?id=600>

WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD

If you think that a child or young person under the age of 18 years old, who lives in the borough, is being abused or neglected, contact the Bromley Children and Families Hub, previously referred to as MASH Team using the contact details below. Outside of office hours and at weekends and public holidays contact the 'out of hours contact' service on 030 0303 8671. If you are seriously concerned about a child's immediate safety, dial 999.

Not all concerns raised about a child will automatically lead to a child protection investigation. Less serious concerns may lead to a more general assessment of need and the provision of services or the offer of advice and information.

Bromley Children and Families Hub (Previously referred to as MASH)

Telephone: 020 8461 7373 / 7379 / 7026

Address: Civic Centre, Stockwell Close, Bromley, BR1 3UH

mash@bromley.gov.uk

Out of Hours Duty Service: 030 0303 8671

A REFERRAL INTO SOCIAL CARE

Referral form, information and guidance - IF IN DOUBT, ALWAYS CALL THE Bromley Children and Families Hub, previously referred to as the MASH TEAM FOR ADVICE

> [Safeguarding children poster 2021](#)

> [Referrals into MASH re FGM](#)

> [Childrens Social Care Referral Form Updated with SoS July 2016.doc](#) THIS IS BEING REVISED FOR SEPT 21

> [What happens when you make a referral July 2016.pdf](#)

> [ThresholdsOfNeed2023-05 \(inzu.net\)](#)

> [Bromley Thresholds of Need Quick Guide](#)

> Government guidance on ['What to do if you are worried a child is being abused'](#) - a guide for practitioners

MASH new front door

Bromley Help Support & Safeguarding Hub for Children and Families will serve as the new 'front door' for safeguarding referrals and referrals for Early Help services for BCP and Family Support. When answering calls this is likely to shorten to "The Children and Families Hub"



Private and Confidential
Safeguarding and Child Protection

File Number

Name	
DOB	
Home address	
Parent / Guardian name and contact detail	
Designated Safeguarding Lead and DDSL	
Additional comments/Brief overview	
Name e of Agency / Family social orker	

case and file opened

case closed

Policy Reviewed by

Mr Mohammed Khan (Safeguarding Trustee) Reviewed
on Monday, 1 September 2025

Sign:

Redwan Hussain (Designated Safeguarding Lead)

Reviewed on Monday, 1 September 2025

Sign:

Abubakr Baporia (DDSL)

Reviewed on Monday, 1 September 2025

Sign: