



# HARMONY

## Primary School

### Safeguarding and Child Protection Policy

**December 2024**  
**Version 9**

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| <b>Original Publication Date:</b> | 6 <sup>th</sup> Aug 2020             |
| <b>Last Review Date:</b>          | 5 <sup>th</sup> Jan 2025             |
| <b>Reviewed by:</b>               | DSL<br>DDSL<br>Safeguarding Governor |

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|---------------------------|--------------------------------------|
| <b>Next Review Date:</b>  | 5 <sup>th</sup> August 2025          |
| <b>To be reviewed by:</b> | DSL<br>DDSL<br>Safeguarding Governor |

This policy was last reviewed in January 2025 and will be reviewed annually.

This policy is made available to all parents on the school website and in hard copy on request from the school office. This is made clear in the school’s Prospectus given to all prospective parents and the school’s Parents’ Handbook given to parents of children enrolled at the school. Upon induction each member of staff, volunteer and governor is also presented with a staff handbook containing our expectations of staff in line with our safeguarding policy.

## **Safeguarding and Child Protection Policy**

The Designated Safeguarding Lead (DSL) is: Mariam Wild.

The Deputy Designated Safeguarding Lead (DDSL) is: Yousif Khan.

The Safeguarding Governor is: Zubair Shah

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## Introduction and aims:

- 1.1 Harmony Primary School is committed to providing a secure environment for pupils, where children feel safe and are kept safe. This policy is addressed to all persons working for or on behalf of HPS, temporary or permanent, paid or in a volunteer capacity. Each and every adult at Harmony Primary School recognizes that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. At Harmony Primary School we recognize that safeguarding issues can occur in all sections of society and we will never adopt the attitude that 'it could not happen here'.
- 1.2 The Safeguarding Policy seeks to support the development of all pupils at Harmony Primary School in ways that will foster security, confidence and independence. It should be regarded as vital to the well-being of the individual and important in promoting the pastoral goals of the school. It provides a model for open and effective communication between children, teachers, parents and other adults working with children. The safety and welfare of the child is paramount.
- 1.3 Our children will be given a safe and protected learning environment, regardless of age, gender, race, culture, religion, sexual orientation or disability in our school and the school's policy and procedures will be applied fairly and consistently to all children and staff working in the school.
- 1.4 In our school we respect all our children and strive to care for their individual needs. The atmosphere within our school is one that encourages all children to do their best. We provide opportunities that enable our children to take and make decisions for themselves.
- 1.5 This policy and procedures within this policy are developed in line with those of the Harrow Safeguarding Children Policy model (HSCB) and reviewed annually in line with the latest publication of KCSIE. It continues to be reviewed in accordance with the principles established by the Children Act 1989 and 2004; and is reviewed annually to be in line with the following:
  - Keeping Children Safe in Education 2024
  - Working Together to Safeguard Children, 2023
  - What to do if you are worried a child is being abused, 2015
  - London Safeguarding Children's Board Procedures, 2016
  - The Prevent Duty Departmental advice for schools and childcare providers, DfE, June 2015
  - Prevent Duty Guidance HM Government 2023
  - Channel Duty Guidance HM Government 2023
  - Use of reasonable force: Advice for headteachers, staff and governing bodies, DfE, 2013
  - Child Missing Education, DfE, 2024
  - Sexual Violence and sexual harassment between children in schools and colleges, DfE, 2021
  - Equalities Act 2010
  - Education Act 2002
- 1.6 Harmony Primary School takes seriously its responsibility under section 157 of the Education Act 2002 (section 175 in relation to the state sector) to safeguard<sup>1</sup> 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 children who are victims of abuse, potential harm.

- 1.7 We recognize that all staff members<sup>2</sup> and governors have a full and active part to play in protecting our pupils from harm and that the child's welfare is our paramount concern.
- 1.8 We, and all staff members, strongly believe that our school should provide a safe, caring, positive and stimulating environment that promotes the social, physical, spiritual, emotional and moral development of the individual child.
- 1.9 The aims of this policy are:
- 1.12.1 To support each child's development in ways that will foster security, confidence and resilience in line with the school's aims.
  - 1.12.2 To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are feeling vulnerable.
  - 1.12.3 To raise the awareness of all teaching and non-teaching staff members of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of '**children in need**', or abuse, neglect, harm or risk of harm, and to be aware of signs of abuse in verbal and non-verbal children.
  - 1.12.4 To provide a systematic means of monitoring children known or thought to be in need or at risk of harm, and ensure we at Harmony Primary School contribute to assessments of need and support plans for those children, alongside other agencies e.g. Social Services, Children with Disabilities Team, the Police and, if ever applicable, School Nurse and Education Welfare Officer.
  - 1.12.5 To acknowledge the need for effective and appropriate communication between all members of staff members in relation to safeguarding pupils.
  - 1.12.6 To set out a structured procedure and framework within the school that will be followed by all members of the school community in cases of suspected need, abuse or neglect.
  - 1.12.7 To develop effective working relationships with all other agencies, involved in safeguarding children, as above.
  - 1.12.8 To ensure that all adults within our school who have access to children have enhanced DBS checks. This includes other community users of our facilities.
  - 1.12.9 To equip staff members to be able to identify possible cases of 'children in need', abuse, neglect, harm or risk of harm by informing them about their indicators.
  - 1.12.10 To set-out what our school does to safeguard all our pupils.

<sup>1</sup> Safeguarding and promoting the welfare of children is (As defined in 'Keeping Children Safe in Education September 2024):  
(A) Protecting children from maltreatment; (B) Preventing impairment of children's mental and physical health or development;  
(C) Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and (D) Taking action to enable all children to have the best outcomes. Children includes everyone under the age of 18 and "where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other agencies"

<sup>2</sup> "Staff members" covers ALL adult staff members on site, including temporary, supply and ancillary staff members, and volunteers working with children

Overall the policy should:

- Provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- Ensure consistent and good practice amongst all staff members.
- Demonstrate Harmony Primary School's commitment to child protection and welfare for all its pupils.

## **2 Key Definitions ('Child in need', 'Early Help', 'additional needs', 'abuse' & 'neglect')**

2.1 The following categories of abuse or neglect are recognized and defined by "Working Together 2023" and are utilized as part of the assessment criteria for determining whether a child/young person may be at risk of significant harm and subject to a child protection plan.

2.2 Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. Appendix 2 contains descriptors for each of the following forms of abuse.

### **2.2.1 Physical Abuse**

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

### **2.2.3 Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 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, though it may occur alone.

### **2.2.4 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.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education known as child-on-

child abuse.

### 2.2.5 Neglect

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

## 2.3 Early Help

Early help means providing support as soon as a problem is identified, at any point in a child or young person's life. Early help can also prevent further problems arising. It relies upon agencies providing services to children and young people working together to identify children and families that would benefit from support and providing a relevant assessment using the Common Assessment Framework (CAF). Generally the DSL takes the lead on Early Help cases.

### 2.3.1 Additional needs

2.3.1.1 This is a broad term used to describe all those children at risk of poor outcomes in their health and development. These are children who would benefit from extra help from additional services (public and voluntary) in order to make the best of their life chances. It must be noted that children with 'additional needs' need support, termed as 'early help', to avoid an escalation of problems that might eventually lead to their case becoming a, much more grave, child in need or child protection issue.

#### 2.3.1.2 Common Assessment Framework

If a staff member feels that a child has additional needs, which are affecting the child's ability to learn, progress and develop normally, and cannot be catered for within the school's usual provision, s/he must keep a detailed chronological log of all incidents and evidence demonstrating the problems and complete and return an 'Initial Concerns Form' to the Headteacher. The headteacher will discuss the issues at stake with the child's teachers and school leader's responsible for pastoral issues and with the child's parents and identify the additional services required by the child.

#### 2.3.1.3 Counselling Service

Harmony Primary School has its own in house counselling service. Through the Board of Governors we have access to a range of Mental Health experts who through 30 years of counselling and experience will arrange for adequate provision to be set in place should it be needed. Harmony Primary School take this matter very seriously and will utilise in house expertise to minimize any delay in this service.

### 2.3.2 Child in need

2.3.2.1 Section 17 of the Children Act 1989 defines a child as being '*in need*' if s/he is under 18 and:

- S/he is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the local authority (LA);
- His or her health or development is likely to be significantly impaired, or further

impaired, without the provision of services from the LA;

2.3.2.1 Development can mean physical, intellectual, emotional, social or behavioural development. Health can be physical or mental health. Having a disability is defined as a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities. The Equality Act defines 'substantial' as being more than minor or trivial – e.g. if it takes much longer than it usually would to complete a daily task like getting dressed. 'Long-term' is defined as lasting for a period of 12 months or more – e.g. a breathing condition that develops as a result of a lung infection. The service or care can also be provided to the child's family or any member of his or her family as long as the aim is to safeguard and promote the child's welfare.

2.3.2.2 LAs are under a general duty to safeguard and promote the welfare of all children in need in their area. LAs must do whatever possible to ensure sufficient services and measures are in place to promote a child being raised within its own family, if it is safe to do so. The LA is obliged to offer the following specific services/support for children in need in their area:

- Advice, guidance and counselling;
- Occupational, social, cultural and recreational activities;
- Home help (including laundry facility);
- Facilities or assistance with travel to and from any services provided under the Act or similar service;
- Assistance to enable the child and the family to have a holiday.

2.3.2.3 Referrals are made in practically the same way as child protection referrals for children at risk of significant harm (see procedures below). Referrals invoke an obligation on the LA to assess the extent of the child's need and what services/support he or she may require. LAs must assess the child in need and his family and the services or care they may require using their own local framework for assessment. The LA will decide whether it will take any action. It may determine that the child is a child in need and therefore produce a plan that requires services to support the child's ongoing placement within their family.

### **3 Standards in Place for Safeguarding at Harmony Primary School**

3.1 Our school procedures for safeguarding children will be in line with Keeping Children Safe In Education 2024, The London Safeguarding Children's Board Procedures 5<sup>th</sup> edition, and "Working Together to Safeguard Children 2023" and will also take into account the procedures and practice of the three safeguarding partners, the local authority, an Integrated care Board for an area within the local authority and the chief officer of police in the local authority area.). We will ensure that:

- 3.1.1 We have a designated senior member of the leadership team for child protection who has undertaken Designated Staff training at level 3 or above and who undertakes refresher training every two years. The completion of this training will be monitored by the safeguarding governor.
- 3.1.2 In the DSL's absence the DDSL who will be appropriately training at Level 3 will deputise in this role. The Designated Safeguarding Lead and deputy DSLs have the complete safeguarding picture and be the most appropriate person/people to advise on the response to safeguarding concerns.
- 3.1.3 Each member of staff receives specific safeguarding training as arranged by the DSL annually, to develop their understanding of the signs and indicators of abuse or



neglect. Immediate action will be taken to update members of staff as per the local councils bulletins and new staff members receive training in Safeguarding during their induction and before having unsupervised access to children. All staff members also annually receive update training and copies of any new Safeguarding guidance or regulations issued by the government or relevant authority and are familiarized with its content. In addition, staff are given regular reminders, further training and updates throughout the academic year.

- 3.1.4 Each staff member, volunteers and governors are made aware of how to respond to a pupil who discloses abuse or neglect and the procedure to be followed in appropriately sharing a concern or disclosure of possible abuse or neglect. Staff members are also advised repeatedly that information sharing is vital to good safeguarding and are also repeatedly instructed to act immediately on any concerns they have at any time about a child's welfare by speaking immediately to the DSL and following this Safeguarding policy, noting that anyone can make a referral directly at any time and teachers have a legal duty to report instances where they become aware that FGM has taken place directly to the police, informing the DSL when doing so to ensure the school is also aware and can safeguard the child appropriately.
- 3.1.5 Each parent/carer is made aware of the school's responsibilities in regard to child protection procedures through publication of the school's Safeguarding and Child Protection Policy, and reference to it in the school's prospectus, parental handbook, home school agreement and website.
- 3.1.6 The school's ensures the suitability of adults working with children on school sites at all times. The school also reserves the right to check any curriculum hirer's might be using and the nature of activities taking place on the premises, including visitors and speakers.
- 3.1.7 Our selection and recruitment policy includes all checks on staff suitability including **Disclosure Barring Service (DBS)** checks as recommended by the DfE and in accordance with current legislation.
- 3.1.8 Community users organizing activities for children are aware of and understand the need for compliance with the school's child protection guidelines and procedures.
- 3.1.9 Our selection and recruitment policy includes all checks on staff suitability including **Disclosure Barring Service (DBS)** checks as recommended by the DfE and in accordance with current legislation.
- 3.1.10 At Harmony Primary School we take these responsibilities very seriously and any member of staff causing concern would be challenged by the Headteacher.
- 3.1.11 Our procedures are reviewed and updated annually.
- 3.1.12 The names of the designated staff members are clearly shown in the school and on the school's website, with a statement explaining the school's role in referring and monitoring cases of suspected abuse or neglect.
- 3.1.13 All adults, including supply teachers and volunteers new to our school are made aware of the name and contact details of the DSL and the school's Safeguarding policy and procedures and have these explained as part of their induction as well as having these detail posted on notice boards in the school for all members of the school community to have ease of access.

## **4 Role and Responsibilities: Designated Safeguarding Lead (DSL)**

### **Responsibility of the DSL:**

The DSL takes responsibility for safeguarding and child protection (including online safety) in the whole school. The DSL is a member of the senior leadership team to ensure they have both the status and authority within the school to carry out the duties of the post.

Some of key responsibilities of the DSL are listed below:

- Ensuring the child protection policies are known, understood and used appropriately by staff.
- To ensure the policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and will work with the Governing Body regarding this;
- To ensure the policies are publicly available 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.
- Encouraging a culture of support, listening and always acting in the best interest of children to demonstrate a commitment to child welfare and protection.
- Managing referrals to childrens social care, the police or other agencies.
- Liaising with the 'case manager' and the local authority officer (LADO) where allegations are made against staff.
- Ensuring staff are given annual training and are kept up to date with the latest statutory guidance.
- Undergoing training and receiving regular updates to maintain knowledge and skills require to carry out the role in a professional and competent manner.
- Take the lead responsibility for safeguarding and child protection (including online safety and understand the filtering and monitoring systems and processes in place).
- Where children leave the school, ensure the file for safeguarding and any child protection information is sent to any new school as soon as possible but transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt.

Guidance on how to fulfill the responsibilities of the DSL above is listed in the section below 'Role of the DSL' in addition with other responsibilities that the DSL is required to undertake.

### **Role of the DSL:**

#### **4.1 Making a referral**

At Harmony Primary School we understand that our responsibility to safeguard children requires that we all appropriately share any concerns that we may have about children. We have a Designated member of staff for child protection who is responsible for the areas below. The designated safeguarding lead is expected to refer all cases of suspected abuse to Harrow Council children's social care and to:

- the Police (where a crime has been committed);
- the Channel programme where there is a radicalisation concern;
- the Disclosure and Barring Service where a person is dismissed or left due to risk/harm.

Following a report from a member of staff or volunteer, the designated safeguarding lead will consider the level of need by applying the thresholds for referral which Harrow Safeguarding Children Board (HSCB) has agreed for use by all agencies and professionals who are worried or concerned about a child's safety or welfare. See Appendix 11: Harrow Council Continuum of need Matrix.

4.2 The DSL will gather all relevant information before making a decision about any further action, unless it is a case of extreme urgency when the relevant investigative agencies should be

informed without delay. Information gathering may involve: -

- Listening to the child/young person
- Making notes of what has been said
- Gathering accounts from members of staff that may have been approached by the child/young person
- Offering continued support and re-assurance

Written accounts should include the time, date, place and people present, as well as what is said, if possible in the words used by the child/young person. They will also 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. Assessments of children consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare ('contextual safeguarding'). Assessments will be recorded securely and stored in line with GDPR legislation.

The designated member of staff may consult other staff and agencies as appropriate during the information gathering process and should seek advice at any time from:

### **Key local contacts for safeguarding children**

#### **Harrow Children's Social Care & Multiagency Safeguarding Hub (MASH)**

**'Golden Number': 020 8901 2690**

Emergency Duty Team: weekends, bank holidays and between 5pm-9am during the week: **020 8424 0999**

**Police 101 or for emergency: 999**

**FGM - Mandatory reporting Police on 101**

**Local Authority Designated Officer for Allegations against staff (LADO)** Rosalind South (Local Authority Designated Officer (LADO), Safeguarding and Quality Assurance Team, London Borough of Harrow.

**Email:** [Rosalind.South@harrow.gov.uk](mailto:Rosalind.South@harrow.gov.uk) Tel: 020 8901 2690 Monday – Friday

For any other days please contact the Golden Number: 020 8901 2690  
(out of hours: 020 8424 0999)

Initial referrals via **MASH/Golden Number** above. (For on-going cases: **020 8736 6435**)

**Children and Young People with  
Disabilities 0-25 years 020 8966 6481**

**Local multi-agency procedures, guidance and Training: Harrow Safeguarding Children Board**  
[www.harrowscb.co.uk](http://www.harrowscb.co.uk)

**NSPCC 0800 800 5000**

**Childline 0800 1111**

**Government's Whistle-blowing Service via NSPCC Report Line 0800 028 0285**

- 4.3 However, if, when all the relevant information has been gathered, or using the levels of need described in the HSCB document [What to do If you are worried about a Child in Harrow](#) s/he will decide whether the child is in immediate danger or is at risk of harm (in which case a referral must be made without delay to children's social care and the police immediately) the designated member of staff makes a decision to refer the case formally a written referral using the Multi Agency Referral Form making a clear statement of the known facts, any suspicions or allegations, whether or not there has been any contact with the child's family. This will be emailed to Social Services (the Child Protection Assessment Team, CPAT), within the borough the child subject to referral resides, liaising with the parents of the child unless the parents are the suspected perpetrators of the abuse or there is real risk of further harm to the child if parents are informed. Referrals for children suspected to be 'in need' will also be referred using the process below. S/he will clarify with the police or children's social care whether the parents should be told about the referral and when and by whom.

Contact details for Harrow are :

**Telephone:** 020 8901 2690

**Out of hours:** 020 8424 0999

**Fax:** 020 8861 1816

**Secure Email:** [duty&assess@harrow.gov.uk.cjism.net](mailto:duty&assess@harrow.gov.uk.cjism.net)

- In the case of injuries, allegations or evidence of a crime having been committed, the Designated staff member will liaise with the headteacher to call the police.
  - The DSL can expect to be informed of the timing of any strategy meetings between the statutory and other key agencies. It is normal that following this a decision is reached regarding the process of any investigation; this may also include the timing, nature and appropriately identified person to inform the parents/carers of the referral (if this has not already been done).
  - Dependent on age and level of understanding a child will be kept informed at all times about the school's actions and procedures for dealing with child protection concerns within the school and beyond. The Police and/or Social Services may carry out an investigation. The child will be offered support throughout the periods of investigation by the DSL or other identified appropriate person and may be given other information about confidential sources of support and counselling services.
  - Staff will be informed about child protection cases by the DSL on a 'need to know' basis. The school will continue to monitor pupils who are subject to a child protection plan, LAC and 'Children in Need' and will continue to inform parents/carers of his/her educational progress. In addition the school's Pupil Attendance Officer will monitor their attendance and need to know about children on child protection plans and those 'in need'.
- 4.4 Referring a child with 'additional needs' for early help and extra services after obtaining parental consent and in partnership with them, using a CAF detailing identified needs. The referral (See Appendix for form) will be emailed to the CAF team at Harrow on [caf@harrow.gov.uk](mailto:caf@harrow.gov.uk) and copies will be provided to parents and the services the child is referred to. The CAF Coordinator, may also refer the case to Children's services Tel **020 8901 2690**. The designated safeguarding lead will support the relevant member of staff in liaising with other agencies and setting up an inter-agency assessment, as appropriate. If early help, or other support is appropriate, the case will 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.
- 4.5 Ensuring that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral.

- 4.6 Ensuring that all such records are kept confidentially and securely and are separate from pupil records, with a front sheet listing dates and brief entry to provide a chronology.
- 4.7 Indicating on the inside of the child's main file that there is a confidential file held by the DSL.
- 4.8 Acting as a focal point for staff members concerns and liaising with other agencies and professionals (as listed above).
- 4.9 Ensuring that either they or another appropriately informed member of staff (class teacher, parent support adviser as appropriate) attends case conferences, family support meetings, core groups, or other multi-agency planning meetings, contributes to the CAF and Framework for Assessments process, and provides a report which has been shared with the parents as appropriate, ensuring that reports for conferences must be objective and evidence based and distinguish between fact, observation, allegation and opinion.
- 4.10 Ensuring that any absence of two days, without satisfactory explanation, of a pupil currently subject to a child protection plan is referred to their Education Welfare Officer and/or a Social Worker and that they are informed about every child that may be subject to a child protection plan or a child in need plan.
- 4.11 Ensuring that all school staff members are aware of the school's Safeguarding policy and procedures and know how to recognise and refer any concerns.
- 4.12 Providing, with the Headteacher, an annual report for the Board of Governors at Harmony Primary School, detailing any changes to the policy and procedures; training undertaken by designated leads for safeguarding and by all staff members and governors; relevant curricular issues, number and type of incidents/cases, and number of children referred to social services and subject to child protection plans (anonymised).
- 4.13 Keeping themselves up to date with knowledge to enable them to fulfil their role, including attending relevant training, at least every two years. With a log of training certificates to be kept on file and on MIS.
- 4.14 Training all staff members at least once every year (with updates) and upon induction (full safeguarding training) when first joining the school. Updating staff and school annually or more frequently as the need might arise, e.g. upon publication of updated statutory guidance. At induction the DSL ensures that new staff members receive and understand the behaviour policy and safeguarding response to children missing education as well as the role and identity of the DSL and the deputies.
- 4.15 Ensuring that any deficiencies or weaknesses in child protection arrangements that are remedied as soon as they become apparent or are raised.
- 4.16 Store child protection records separately from pupils' school records, marking them 'confidential' and keeping them securely locked. They will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved a note of any action taken, decisions reached and the outcome. Child protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. For manual records, the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However in cases of child abuse which come to court, the court may require the school to provide its child protection records. When a child/young person subject to a child protection plan changes school the information will be transferred to the child's new school immediately (to Headteacher and new school DSL) and the DSL will inform the key worker.

- 4.17 The DSL will attend all strategy meetings required and, coordinating with other staff members, contribute to inter-agency plans and provide additional support to children subject to child protection plans.
- 4.18 The school will work in partnership with children’s social care and give them access where needed and, where appropriate, for that authority to conduct or to consider whether to conduct, a section 17 or a section 47 assessment.
- 4.19 The DSL will seek to hear and understand the feelings, views and feedback of the child being referred and take these into account at each step of the process.
- 4.20 The role and responsibilities of our Safeguarding lead will be made explicit in the post holder’s job description and take account of Keeping Children Safe in Education (September 2024) Annex B: Role of the designated safeguarding lead.
- 4.21 The designated safeguarding lead will understand the requirements of the Prevent duty and provide advice to staff on protecting children from the risk of radicalization.

#### **4.22 Work with Others**

The designated safeguarding lead is expected to:

- liaise with the headteacher to inform him / her of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” and the local authority designated officer (LADO) in cases regarding allegations against staff;
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Support staff who make referrals to the Channel programme or to children’s social care;
- liaise with the local authority and work with other agencies in line with [Working Together to Safeguard Children \(2023\)](#). 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;
- share information with appropriate staff in relation to a looked after child (LAC)) 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;
- share information with social services and gather information to help making referrals or making decisions about referrals or the appropriate response to concerns about a child;
- ensuring the child protection file is transferred to the new school of any pupil that moves to a new school, sharing information in advance of the transfer to ensure the child’s welfare;
- ensure s/he has details of the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after her/him. The designated safeguarding lead should have details of the child’s social worker and the name of the virtual school headteacher in the authority that looks after the child. We have a designated teacher for looked after children. We monitor the progress and wellbeing of looked after children carefully.

#### **4.23 Training**

The designated safeguarding lead (and deputies) will undertake formal Level 3 DSL training, to provide her/him with the knowledge and the skills required to carry out the role, at least every two years. Training should include Prevent awareness training. In addition her/his knowledge will 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, but at least annually, to allow her/him to understand and keep up to date with any developments relevant to her/his role so s/he:

- understands the assessment process for providing early help and intervention, for example through locally agreed shared assessment processes, such as early help assessments;
- has 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;
- ensures every member of staff has access to and understands the school's child protection policy and procedures, especially new and part-time staff;
- is alert to specific needs of children in need, those with special educational needs and young carers;
- keeps detailed, accurate, secure written records of concerns and referrals;
- understands and supports the school with regards to the requirements of the Prevent duty and provides advice and support to staff on protecting children from the risk of radicalisation;
- obtains resources and attends any relevant or refresher training courses;
- encourages a culture of listening to children and taking account of their wishes and feelings, among all staff, and any measure the school or college may put in place to protect them.
- Will work with the Governing body to ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction.

## **5 Responsibilities: Headteacher**

- 5.1 The headteacher will ensure that the policies and procedures adopted by the school are fully implemented and that sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.
- 5.2 The school recognises that staff anxiety around child protection can undermine good practice and so have established clear lines of accountability, training and advice to support the process and individual staff within that process. In our school community any individual can contact the designated safeguarding lead (DSL) if they have concerns about a child or young person.
- 5.3 The headteacher will ensure that all staff read at least Part One of Keeping Children Safe in Education (September 2024) as well as this policy.
- 5.4 The headteacher will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of the above guidance for example through annual updates and training at induction of new staff.
- 5.5 This will include periodic audits of child protection files and records by the DSL and by the Designated governor for Safeguarding.
- 5.6 The views of children, parents, carers and staff members will be sought on child protection and safeguarding arrangements through surveys, questionnaires and other means.

## **6 Responsibilities: Staff members**

- 6.1 All staff members are aware of their duty to be good role models for all pupils at our school. Staff members are given training in Safeguarding and Child Protection on joining the school or once annually along with all staff by the school's DSL. It is the duty of each staff member to be vigilant in protecting the Safety and welfare of all pupils.
- 6.2 Staff must at all times adhere to the schools code of conduct and ensure that good practice is maintained. Good practice includes:
- Listening to children and treating them with respect
  - Setting a good example and conducting ourselves appropriately

- Encouraging positive, respectful and safe behaviour amongst pupils
- Involving pupils, as far as possible, in decisions that affect them
- Whenever possible, asking the pupil's permission before initiating physical contact such as assisting with dressing, physical support during PE or administering first aid. Keep all physical contact to the minimum required. (Refer to section on positive handling for more guidance)
- Being aware that actions can be misinterpreted and try, as far as possible, to teach in a group setting. Where this is not possible, inform another member of staff of the intended activity, which should be carried out with easy access to nearby staff • be aware of spatial arrangements and avoid working in enclosed spaces with a pupil.
- Take care when dealing with injuries or physical issues, such as toilet mishaps. Unless it is an emergency, do not remove a pupil's clothing without another adult present.
- Make sure that the glazed inserts on doors are left uncovered and that views into the room are left unobstructed
- Follow the school's E-Safety policy and acceptable use of ICT, particularly in regard to online contact and electronic communication with pupils and the use of imaging devices, such as cameras and mobile phones
- Recognising that challenging behaviour may be an indicator of abuse
- Reading and understanding the school's child protection policy and other related safeguarding guidance
- Being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- Be alert to changes in pupil's behaviour and to signs of abuse, neglect and exploitation and refer all concerns about a pupil's safety and welfare to the DSL, or if necessary, directly to the police or children's social care

- 6.3 It is the duty of each staff member to have attended training and have knowledge and understanding of the signs and indicators of abuse and follow the policy and procedures set out in this policy and in the training they receive, to deal correctly with instances in which those signs and indicators become apparent in a victim or in a perpetrator. It is also the duty of each staff member to have read and understood part 1 of the most recent DfE publication 'Keeping Children Safe in Education', which is distributed to staff by the DSL on its update<sup>4</sup>.
- 6.4 Staff members are allowed to use 'positive touch' at the school. A varying degree of physical prompts, guides and reassurances are appropriate for the age, learning needs and circumstances of a child. More intrusive physical contact may be necessary when people are supporting young children with disabilities. Positive touch is appropriate when it meets the needs of the child but in order to protect both staff and children it must be born in mind at all times that innocent actions can be misconstrued. Children may also find being touched uncomfortable or distressing for a variety of reasons. Staff must behave sensitively to a child's reaction to physical contact and act appropriately and always avoid touching pupils, however casually, in ways or on parts of the body that might be considered inappropriate. Staff members are instructed, upon joining the school, about appropriate physical contact with children, to avoid being in a room alone with a child and to ensure they never use pupil toilets nor knowingly enter them allowing the door to shut whilst pupils are using them, referring to the document "Guidance on Safe Working Practices for the Protection of Children and Staff members in Education Settings" (Appendix 5). This to ensure staff members do not place themselves in positions vulnerable to misinterpretation or allegations.
- 6.5 If any member of staff suspects that a child in his/her class may be a victim of abuse, or a child makes a disclosure to them directly, they must immediately inform the DSL about their concerns. All staff and volunteers should be aware that the main categories of abuse are:



<sup>4</sup>Latest version: September 2024

- physical abuse
  - emotional abuse
  - sexual abuse
  - neglect
- 6.6 All staff and volunteers should be aware of the signs of abuse, neglect and exploitation. Knowing what to look for is vital to early identification. See appendices 5, 'Abuse descriptors/indicators' and 6, 'Sites of physical abuse'.
- 6.7 Staff should be particularly aware that some children have an increased risk of abuse or require early support to prevent issues from escalating. Many factors can contribute to an increased risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. In particular staff should be particularly aware to the needs of a child who is disabled or has special education needs. Refer to Section 10' Send Children'
- 6.8 Generally, in an abusive relationship the child may:
- appear frightened of the parent/s or other household members e.g. siblings or others outside of the home;
  - act in a way that is inappropriate to her/his age and development (full account needs to be taken of different patterns of development and different ethnic groups);
  - display insufficient sense of "boundaries", lack stranger awareness;
  - appear wary of adults and display "frozen watchfulness".
- 6.9 In an abusive relationship, a parent or carer may:
- persistently avoid child health services and treatment of the child's illnesses;
  - have unrealistic expectations of the child;
  - frequently complain about or to the child and fail to provide attention or praise;
  - be absent;
  - be misusing substances;
  - persistently refuse to allow access on home visits by professionals;
  - be involved in domestic violence and abuse;
  - be socially isolated.
- 6.10 Serious case reviews have found that parental substance misuse, domestic abuse and mental health problems (sometimes referred to as the 'toxic trio'), if they co-exist in a family could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.
- 6.11 If a child discloses that he or she has been abused in some way, the member of staff or volunteer should:**
- listen to what is being said without displaying shock or disbelief
  - accept what is being said
  - allow the child to talk freely – do not put words in the child's mouth
  - only ask questions when necessary to clarify
  - reassure the child, but not make promises which it might not be possible to keep
  - not promise confidentiality - it might be necessary to refer to children's social care
  - emphasize that it was the right thing to tell
  - reassure her/him that what has happened is not her/his fault
  - do not criticise the alleged perpetrator
  - explain what has to be done next and who has to be told
  - make a written record immediately after the conversation
  - pass the information to the designated safeguarding lead without delay

- consider seeking support for yourself and discuss this with the designated safeguarding lead – dealing with a disclosure can be distressing
- 6.12 Additional consideration needs to be given to children with ‘communication difficulties’ and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- 6.13 When a child has made a disclosure, or when an individual has concerns about a child’s welfare the member of staff/volunteer should:
- make brief notes immediately after the conversation;
  - make a complete and formal record as soon as possible afterwards. Use the school’s Child Protection Concerns Form;
  - not destroy the original notes in case they are needed by a court;
  - record the dates and times of your observations;
  - record the date, time, place and any noticeable non-verbal behaviour and the actual words used by the child or any discussions you were involved in;
  - record explanations given by the child / adult;
  - draw a diagram to indicate the position of any injuries;
  - record statements and observations rather than interpretations or assumptions;
  - sign and date the record;
  - avoid asking the child leading questions or taking statements and note down accurately the exact words spoken by the child.
- 6.14 Report and submit records to the DSL immediately, who is the only member of staff allowed to store any records on child protection concerns. It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.
- 6.15 If signs of abuse are manifest on the child’s body, this must also be noted on the form pictorially.
- 6.16 All staff members maintain the privacy and confidentiality of the individuals involved though they must make clear that they cannot promise complete confidentiality to the pupil in order that they and potentially other children may be safeguarded. Staff members must refrain from discussing the case with anyone unrelated to it, other than the Child Protection Officer. Staff members have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigative agencies.

Staff should be aware that:

- The statutory guidance ‘Keeping Children Safe in Education’ emphasizes that any member of staff can contact children’s social care directly if they believe that this is necessary to safeguarding the child.
- If disclosures involve another member of staff, then procedures outlined section 13 ‘Allegations against Staff Members’ and section 14 ‘Whistleblowing Policy’ should be followed.
- In accordance with the UK General Data Protection Regulation (UK GDPR) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The information should be:
  - Necessary and appropriate
  - Relevant
  - Adequate
  - Accurate
  - Timely
  - Secure

See section on 'Confidentiality' for more detail.

- 6.17 All staff members are expected to behave sensitively and professionally with pupils who are thought to be at risk of abuse and always act in the interests of the child.
- 6.18 It is the duty of every staff member to refer any safeguarding or welfare query they have about any pupil to the DSL, however minor it might seem.
- 6.19 In line with our school's code of conduct, it is the duty of each staff member to ensure they conduct themselves in a manner befitting of a teacher and as a role model for pupils both in and out of school. Thus activities and behaviour indulged in outside of school must never reflect the school, their role and the profession in a poor light or bring the school into disrepute or give pupils a bad example. This includes the use of the internet and all other forms of media.
- 6.20 It is not the duty of any member of staff to investigate a child protection allegation. The options after staff have spoken to the DSL about a concern include:
- managing any support for the child internally via the school's pastoral support processes (speak to the DSL, deputy head or headteacher; see section 8);
  - an early help assessment (see section 2.3);
  - a referral for statutory services (see section 4.1).
- 6.21 In exceptional circumstances where concerns are not taken seriously by school leaders, or action to safeguard the child is not taken, and the child is considered to be at continuing risk of harm, staff members can speak directly to CPAT (details in 4.3 above and section 27 below). All staff must be aware of the process for making referrals and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they may be expected to play in such assessments. It is everyone's responsibility to ensure that concerns are followed up. If a staff member has reported a concern, s/he should expect to be informed about what has happened following the report. If s/he does not receive this information, s/he should be proactive in seeking it out.
- 6.22 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately using MASH (See Section 4.2). Anybody can make a referral. If anyone other than the designated safeguarding lead (DSL) makes the referral, s/he should inform the DSL as soon as possible. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.
- 6.23 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. If a staff member does not feel that such concerns have been taken seriously by the senior leadership team, s/he should use the school's whistle blowing procedures detailed below in section.
- 6.24 If a teacher discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18, this must be immediately reported to the police. This is a statutory duty. The *teacher* must report directly to the police but must also notify the DSL immediately who also make an immediate safeguarding referral.
- 6.25 Staff members also need to understand their role in the early help process: identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals. Particular attention will be paid to the attendance and development of each child about whom there are concerns, or who has been identified as being the subject

of a child protection plan and a written record will be kept. The DSL should be informed of the unexplained absence of any child or young person on a child protection plan on the first day of absence, as soon as it is discovered at registration.

## **7 Responsibilities: Governors/Headteacher**

- 7.1 The school's Headteacher will ensure that the school contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children 2023. This includes providing a co-ordinated 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.
- 7.2 The school's Headteacher will ensure that the school's safeguarding arrangements take into account the procedures and practice of the three safeguarding partners in accordance with the new legislation.
- 7.3 The school's Headteacher has ensured there is an effective Safeguarding policy in place and a staff code of conduct in the school's Staff Handbook. These documents are provided to all staff on induction, including temporary staff and volunteers. The child protection policy is prepared in accordance with government guidance, including those referred to at the start of this policy and in accordance with the three safeguarding partners. This policy is updated annually and is available publicly via the school website.
- 7.4 The school's Headteacher has put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, and to help prevent the risks of their going missing in future. These are set out in this policy in paragraph 24 below and in the school's Pupil Attendance policy.
- 7.5 The headteacher ensures that the policies and procedures adopted by the School, particularly concerning referrals of cases of suspected abuse, neglect and exploitation are followed by all staff.
- 7.6 DSL has the appropriate authority and 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.
- 7.7 The DSL will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children 2023. There is always cover for this role as the DDSL has been appointed as the deputy lead's for safeguarding, to act in the DSL's absence. The Headteacher will ensure they are suitably trained at least once every two years.
- 7.8 The school's headteacher has ensured children are taught about Safeguarding through the provision of PSCE, SEAL (social and Emotional Aspects of Learning) and through RSE where relevant in the school curriculum.
- 7.9 The school's Headteacher has ensured that recruitment is safe and that all children are safe at the school.

- 7.10 In line with Keeping Children Safe in Education (September 2024) the Headteacher prevents people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and by ensuring volunteers are appropriately supervised. The school has written recruitment and selection policies and procedures in place in the school's Recruitment policy.
- 7.11 The Headteacher for safeguarding is responsible for conducting regular checks on the school's Safeguarding policy and procedures, including the Single Central record and staff files. He and his deputy are trained in Safer Recruitment and ensure that on any interview panel, at least one member has been trained in Safer recruitment. He/She will ensure the headteacher will be trained in Safer Recruitment.
- 7.12 In line with Keeping Children Safe in Education (September 2024) the Headteacher ensures there are procedures in place to handle allegations against members of staff and volunteers (see section 10 below). There are also procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a staff member in regulated activity is dismissed or removed due to safeguarding concerns, or would have been had they not resigned (see paragraph 10.17 below) . The Board understands that this is a legal duty and failure to refer when the criteria are met is a criminal offence.
- 7.13 The school's headteacher has ensured that there are procedures in place to handle allegations against other children.
- 7.14 The school's Headteacher has ensured that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring children are given the opportunity to express their views and give feedback as an essential step of Safeguarding procedures. This policy makes explicit that staff members cannot agree confidentiality and must always act in the interests of the child (see paragraph 5.7 above).

## **8 Supporting children**

- 8.1 We recognise that a child who is abused or neglected, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self worth.
- 8.2 We recognise that the school may provide the only stability in the lives of children who have been abused or neglected or who are at risk of harm.
- 8.3 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 8.4 Harmony Primary School will support all pupils by:
- 8.4.1 Encouraging the development of self-esteem and resilience in every aspect of school life including through the curriculum.
  - 8.4.2 Promoting a caring, safe and positive environment within the school through the PSHE, SEAL, Islamic Studies and other curricula, helping pupils to develop awareness of how to keep themselves safe, adopt a healthy lifestyle, including healthy eating and physical exercise and by encouraging them to form positive friendships and relationships.
  - 8.4.3 Liaising and working together with all other support services and those agencies

involved in the safeguarding of children.

- 8.4.4 Notifying Social Services as soon as there is a significant concern.
- 8.4.5 Ensuring that a named teacher is designated for Looked After Children (LAC) and that an up to date list of children is regularly reviewed and updated. The designated person for this is the Deputy Designated Safeguarding Lead. Previously looked after children remain vulnerable and it's important agencies work together to safeguard them so children who are no longer looked after will continue to be monitored to keep them safe. Training will also be provided to staff to build confidence and skill in caring for looked after and vulnerable pupils.
- 8.4.6 Providing continuing support to a pupil (about whom there have been concerns) who leaves the school by ensuring that such concerns and school medical records are forwarded under confidential cover to the Headteacher and DSL at the pupil's new school as a matter of urgency, a photocopy of these records being kept in a confidential file, storage and retention of which is subject to the school's Data Protection policy. This applies equally to those children who may be subject to a child protection plan. Information sharing will be considered prior to transfer of files in the best interests of the child's welfare.
- 8.4.7 Ensure that the child's feelings, views and feedback are sought and taken into account as an essential step of Safeguarding protocol.
- 8.4.8 Where the school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, and will satisfy itself that the provider meets the needs of the pupil through written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

## **10 SEND children**

- 10.1 Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. For example, barriers can exist when recognising abuse and neglect in this group of children. These can include:
  - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
  - the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

<sup>6</sup> Sexting in schools and colleges: Responding to incidents and safeguarding young people, Uk Council for Child Internet Safety

- communication barriers and difficulties in overcoming these barriers.

- 10.2 Staff training in safeguarding will include the raising of awareness of these issues so that staff are alert to potential indicators and the impact of abuse on vulnerable children. Staff will also consider strategies to overcome communication barriers.

## **10 Confidentiality**

- 10.1 All staff recognise that all matters relating to child protection are confidential.
- 10.2 The DSL, will disclose personal information about a pupil to other members of staff on a need to know basis only.
- 10.3 However, all staff members must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 10.4 All staff members must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.
- 10.5 The Headteacher or DSL will always undertake to share the school's intention to refer a child to social services with his/her parents/carers unless doing so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with social services on this point.
- 10.6 Child Protection records will be kept by the Designated staff lead for Safeguarding and Child Protection. They will be kept separately from pupil school records, marked 'confidential' and securely locked. They will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved a note of any action taken, decisions reached and the outcome. In addition the date, event and action taken in cases of suspected child abuse or when the child/young person has a child protection plan or is a child in need.

## **11 Allegations against staff members**

- 11.1 Allegations made against / concerns raised in relation to teachers, including supply teachers, other staff and contractors. The school has separated this into two sections: the first for allegations that may meet the threshold, and the second for allegations / concerns that do not (i.e. low-level concerns).
- 11.2 Managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This policy should be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers 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.
- 11.3 A low-level concern is any concern that an adult has acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- 11.4 Examples of low-level concerns can include:
- being over friendly with children

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

- 11.5 To help prevent low-level concerns, staff codes of conduct, behaviour policies and safeguarding policy and procedures is to be implemented effectively and appropriate action is taken to deal with any concern.
- 11.6 Sharing concerns - Low-level concerns about a member of staff should be referred to the headteacher or principal. If there are concerns about the headteacher or principal these concerns should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; unless the headteacher is also the sole proprietor of an independent school or there is a conflict of interest in reporting the matter to the headteacher, in which case this should be reported directly to the local authority designated officer.
- 11.7 Harmony Primary School creates an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards.
- 11.8 Recording concerns - All low-level concerns should be recorded in writing. Records should include the details of the concern, how the concern arose, the actions taken and the name of the person sharing their concerns. If the individual wishes to remain anonymous, this should be respected as far as possible.
- 11.9 Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken.
- 11.10 All school staff members and volunteers should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children, or parents, to be conducted in view of other adults. (See also 9.3 above)
- 11.11 All staff members and volunteers are aware of the school's staff code of conduct and disciplinary policy and implement it carefully. This can be found in the staff handbook. Staff members are trained on induction and annually on its implementation.
- 11.12 We understand that a pupil may make an allegation against a member of staff or volunteer. If such an allegation is made, no suggestions should be made to a pupil for alternative explanations for their worries, he/she must be listened to and heard. A written dated record should be immediately made of the allegations or as soon as practicable and within 24 hours. Should the pupil request confidentiality, s/he must be informed that this cannot be guaranteed as all staff members have a responsibility to report any such allegations and ensure that the pupil is safe.
- 11.13 The member of staff receiving the allegation will immediately inform the Headteacher, or the deputy head if the Headteacher is not present, or the most senior teacher if the deputy head is also not on-site. It is not the duty of any member of staff to investigate an allegation.
- 11.14 When an allegation is made against a member of staff or volunteer, there **should** be urgent initial consideration by the Headteacher, of whether or not there is sufficient substance in an allegation to warrant an investigation. Similar responsibility is placed on the Chair of Governors if the allegation concerns the Headteacher. The Headteacher **should** consult the **Local Authority Designated Officer** who will assist in the initial consideration and provide advice as to the process of any potential investigation.



- 11.15 The Headteacher may discuss the allegation with the Local Authority Designated Officer, **Email:** [Rosalind.South@harrow.gov.uk](mailto:Rosalind.South@harrow.gov.uk) Tel: 020 8736 6435 Monday – Friday

For any other days please contact the Golden Number: 020 8901 2690 (out of hours: 020 8424 0999)

- 11.16 Consideration will also be given to the possibility of an internal discipline enquiry once any police investigation has been concluded. In the case of an allegation being unfounded the Headteacher will decide the most appropriate action to be taken. The headteacher will also inform the designated governor for Safeguarding and the Chair of the school's board of governors.
- 11.17 Consideration must be given to the pupil making the allegation and any others who may have suffered any harm, all such children should also be discussed and referred by the Headteacher to the Designated staff lead for Safeguarding to make an immediate child protection referral to the [Rosalind.South@harrow.gov.uk](mailto:Rosalind.South@harrow.gov.uk) and [duty&assess@harrow.gov.uk.cjsm.net](mailto:duty&assess@harrow.gov.uk.cjsm.net).
- 11.18 If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors, who will consult as in 10.3.1 above. The Designated Officer for Harrow will assist in these cases.
- 11.19 The school will follow the Local Authority procedures for managing allegations against staff as outlined in Part 4 "Keeping Children Safe in Education 2024". This is to be read in conjunction with chapter 7 of The London Child Protection Procedures.
- 11.20 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult (as in 10.3.1-2 above) in making this decision.
- 11.21 Our lettings agreement for other users requires that the organiser will manage the suspension of adults where necessary from school premises.
- 11.22 The school's Safeguarding Adviser should ensure that the fullest details of allegations, including potential third hand disclosures (e.g. allegations made to 'allegers' by other pupils) are given to the Designated Officer for Harrow and put into the Multi-Agency Referral forms sent for the original 'allegers'. In addition it must be ensured that these issues are also directly addressed at joint strategy meetings, in case they are not explored during any subsequent investigation.
- 11.23 After highlighting each pupil named as a witness or potential witness (having made a third party disclosure) with the Designated Officer for Harrow and the first strategy meeting (in particular the police) and requesting the go-ahead from the Designated Officer for Harrow and strategy meeting panelists, the school's Safeguarding Adviser should inform all those pupils' parents about the nature of the allegations and the extent of their child's involvement.
- 11.24 The school's headteacher should have regular meetings with all parents/families involved to keep them updated with the progress of the investigation, or to report, if it is the case, that there are no new developments and allay anxiety.
- 11.25 In the event that any allegations do not meet the threshold for criminal prosecution, the Headteacher is responsible for initiating an investigation into whether a disciplinary offence was committed. When interviewing children for such investigations, a witness from the school will be present and a parent will be also be invited.
- 11.26 When interviewing pupils or parents as part of such investigations, the interviewer will send parents a copy of the record of interview for their checking and agreement as accurate representations of the interviews.

- 11.27 The headteacher will inform parents before announcing decisions post-disciplinary-investigation in case new facts or witnesses emerge that may impact its conclusions and the nature of disciplinary action to be applied.
- 11.28 The school will consult with the Designated Officer for Harrow to decide whether to report within one calendar month of dismissal any member of staff against whom allegations have been substantiated to the Disclosure and Barring Service and in the case of a member of teaching staff whether to refer the matter to the Secretary of State or other relevant authority dealing with serious misconduct and unsuitability to work with children and Teaching Regulation Agency to consider prohibiting the individual from teaching<sup>7</sup>. In particular a referral to the DBS is a legal requirement if a staff member is dismissed or removed due to a safeguarding concern.
- 11.29 The Harmony Primary School is committed to creating a positive and safe working environment for its workers in line with its core values. We seek to create and maintain a working environment where individuals are treated with respect and dignity. The Board is opposed to all forms of unlawful discrimination, bullying and harassment of any kind. The Board, Headteacher and senior leaders are firmly committed to the success of this policy and all steps taken towards its achievement.

## **12 Whistle blowing**

- 12.1 We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so. Our Islamic ethos encourages that we act as ‘a mirror to one another’ – this is as a mirror of good advice. This is also in the spirit of an important saying of the famous companion of the Prophet Muḥammad, Sallallahu ^alayhi wa sallam, ^Umar ibn Al-Khattab, who said, ‘Hold yourself to account before the Day of Account.’
- 12.2 All staff members should be aware of their duty to raise concerns about the attitude or actions of colleagues. They should raise their concerns directly with the headteacher even if in any doubt. If the concerns are school-system-wide or concern the headteacher, they should raise them with the chair of governors. If the concerns are wider still then they should contact the Local Authority Designated Officer for Child Protection.
- 12.3 Staff and volunteers should feel confident to also raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regime with the headteacher at any time. Where a staff member feels unable to raise the matter with the headteacher or feels their genuine concerns are not being addressed or the concerns relate to the headteacher, s/he should raise them with the chair of governors.
- 12.4 Staff members can call the NSPCC whistle blowing advice line on [0800 028 0285](tel:08000280285) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their school/organisation.

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<sup>7</sup> DBS referrals: form and guidance, DfE, 2015

### **13 Positive Handling**

- 13.1 Our policy on positive handling by staff members is set out separately in the school's Use of Force and Physical restraint policy. It complies with governmental guidance on positive handling strategies and use of force as outlined by the 'Education and Inspections Act 2006' and the DfE 'Use of Reasonable Force, advice for headteachers, staff and governing bodies 2013'. This guidance states that staff members must only ever use physical intervention as a last resort, e.g. if a child is endangering him/herself or others and that at all times it must be the minimal force necessary, reasonable and proportionate, to prevent injury to another person whilst seeking to avoid causing injury to the pupil. The decision to use force to control or restrain a child is down to the professional; judgment of the staff member concerned and should always depend on the individual circumstances.
- 13.2 Such events should be recorded, dated and signed by a witness (if present).
- 13.3 Staff members who are likely to need to use specialist positive handling techniques should be appropriately trained. Positive handling techniques can be devised to meet the individual needs of children with challenging behaviour.
- 13.4 We understand that positive handling of a nature that causes injury or distress to a child may be considered under child protection or disciplinary procedures. However, it must also be accepted that in using reasonable and proportionate action this may sometimes result in the pupil concerned or member of staff receiving a mark or injury. The presence of such a mark or injury should not always be taken as evidence of malpractice on behalf of the member of staff.

### **14 Supporting staff members**

- 14.1 We recognise that staff members working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 14.2 We will support such staff members by providing an opportunity to talk through their anxieties with the DSL and to seek further support. This could be provided for all staff members by, for example, the Headteacher, and/or a teacher representative as appropriate.
- 14.3 We understand that staff members should have access to advice on the boundaries of appropriate behaviour. The document "Guidance on Safe Working Practices for the Protection of Children and Staff members in Education Settings" provides advice on this and the circumstances, which should be avoided in order to limit complaints against staff members of abuse of trust, and/or allegations of physical or sexual abuse. These matters form part of staff members induction and are referred to in the staff handbook.
- 14.4 We recognise that designated staff members should have access to support (as in 9.2 above) and appropriate workshops, courses or meetings as organised by Children's Services or the Local Safeguarding Children's Board.

### **15 Prevention**

- 15.1 We recognise that the school plays a significant part in the prevention of harm to our pupils by providing pupils with effective lines of communication with trusted adults, supportive friends and an ethos of protection within their duty of care.
- 15.2 The school community will therefore:
- 16.2.1 Establish and maintain an ethos, which is understood by all staff members, which

enables children to feel secure and encourages them to communicate their feelings and concerns whatever their mode of communication. Children's communication difficulties mean that staff must be vigilant at all times for signs of physical and emotional abuse, neglect and exploitation.

16.2.2 Ensure that all children feel there is an adult in the school whom they can approach if they are worried or in difficulty.

16.2.3. Provide across the curriculum, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

The below section of the safeguarding policy is to draw attention to specific instances of abuse as well as specific scenarios where the welfare of children can be at risk (such as online and during the recruitment process). The following section therefore outlines actions required for all staff to undertake if such abuse is identified as well as where extra caution is required.

## **9. Child-on-child abuse**

9.1 Severe harm may be caused to children by the abusive and bullying behaviour of other children, which may be of a physical, sexual or emotional nature. Incidents of bullying, abuse and harmful behaviour or exploitation will not be tolerated and sanctions will be enforced if any member of the school community breaches any of our policies. Our response will be proportionate to the context of each incident but we will involve the police when actions are considered illegal and harmful. Abuse is abuse and will never be tolerated or passed off as "banter" or "part of growing up."

9.2 Child-on-child abuse can manifest itself in many ways and will often include bullying, cyberbullying, physical abuse, sexual violence, sexual harassment, upskirting and sexting.

9.3 It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

9.4 Those at high risk for being targeted for bullying and abuse by their peers are children and young people with Special Educational Needs and Disabilities (SEND), young carers, Black and Minority Ethnic (BME), those who are, or thought to be LGBT.

9.5 The signs and symptoms of bullying and the procedures for reporting and managing bullying are found in our Anti-Bullying (including cyber bullying) Policy. Young people often do not anticipate the implications of sharing intimate or sexually explicit images or other content online, but the consequences can be devastating. In extreme cases it can result in suicide, isolation, vulnerability. Young people are not always aware that their actions are illegal but can end up with a criminal record.

9.6 The same signs and symptoms of physical and sexual abuse that pertain to the abuse of children by adults are applicable to the abuse of children by other children (see Appendix 2).

9.7 When any member of staff or volunteer has a suspicion or becomes aware that a child or

young person has been sexually abused or sexually harassed by another pupil, or is likely to be involved in sexually harmful behaviour, or is bullying another child or student, these suspicions must be reported to the DSL in accordance with section 5. The DSL will invoke Keeping Children Safe in Education 2024 and the DfE's recent guidance "Sexual violence and sexual harassment between children in schools and colleges" and follow the steps prescribed in it carefully.

## 9.8 Youth produced sexual imagery (sexting)

9.8.1 Creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person under the age of 18 is breaking the law if they:

- take an explicit photo or video of themselves or a friend;
- share an explicit image or video of a child, even if it's shared between children of the same age;
- possess, download or store an explicit image or video of a child, even if the child gave permission for it to be created.

9.8.2 As of January 2016, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action is not in the public interest. Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk. We will work collaboratively with the police so that they respond appropriately in cases of youth produced sexual imagery and to record incidents in a way which should not have a long term negative impact on young people.

9.8.3 All incidents involving youth produced sexual imagery will be responded to in line with the school's safeguarding and child protection policy:

- the incident will be referred to the designated safeguarding lead as soon as possible;
- the designated safeguarding lead will hold an initial review meeting with appropriate school staff;
- there will be subsequent interviews with the young people involved (if appropriate).
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm;
- at any point in the process if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

9.8.4 Recognising and reporting any disclosures of incidents involving youth produced sexual imagery will be covered within staff induction and training.

9.8.5 Any direct disclosure by a young person will be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

9.8.6 If a student is disclosing that they have received, sent or shared an illegal image, staff will adhere to the procedures for managing and reporting a disclosure already described in Section 5. As part of her/his response, the designated safeguarding lead's response will include:

- carrying out a risk assessment of the pupil or student;
- possible search for, confiscation and safe storage of a mobile device by the

headteacher (observed by a member of the safeguarding team) if there is clear evidence to suggest that there is an immediate problem;

- as relevant, blocking the network and isolating the image or, if appropriate, immediate action will be taken to delete or remove images from devices or online services;
- as relevant, making a referral in line with the Harrow HSCB thresholds and contacting the local police or referring the incident to CEOP;
- putting necessary safeguards and support in place for the child or young person, such as informing parents, providing counselling and advice for child/young person and parents;
- managing the reaction of other students through tutor groups, assemblies, PSCHE, Circle Time and visiting speakers;
- if necessary informing another school, college or setting.

9.8.7 The revised Education Act 2011 gives schools and teachers the power to seize and search an electronic device if they think there is good reason for doing so. A device can be examined, confiscated and securely stored if there is reason to believe it contains indecent images or extreme pornography.

9.8.8 The technical solutions we employ to protect students and staff from abusive use of IT and social media include firewalls, filtering and network monitoring and are listed in our Acceptable Use policy. We take into account [Searching and screening and confiscation advice](#)<sup>5</sup>.

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<sup>5</sup> Searching, screening and confiscation Advice for headteachers, school staff and governing bodies, DfE, February 2014

9.8.9 An immediate referral to police and/or children's social care should be made if at this initial stage:

- the incident involves an adult;
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs);
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- the imagery involves sexual acts and any pupil in the imagery is under 13;
- the designated safeguarding lead has reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

9.7. 10 If none of the above apply then it may be decided to respond to the incident without involving the police or children's social care (and escalate the incident at any time if further information/concerns come to light).

9.7.11 The decision to respond to a sexting incident without involving the police or children's social care will be made in cases when the designated safeguarding lead is confident that s/he has enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary

framework and, if appropriate, local network of support.

- 9.7.12 The decision will be made by the headteacher with input from the designated safeguarding lead and from other members of staff if appropriate. The decision will be recorded in line with school policy.
- 9.7.13 The decision will be in line with our child protection procedures and will be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.
- 9.7.14 These procedures are based on [Sexting in schools and colleges: responding to incidents and safeguarding young people](#)<sup>6</sup> which provides further detail on reporting incidents to the police, securing and handing over devices to the police, searching devices, viewing and deleting imagery.

### 15.3 Recruitment and Vetting

- 16.3.1 The arrangements for recruiting all staff, permanent and volunteers, to our school will follow DfE guidance for safer recruitment<sup>8</sup> in education settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks. Harmony Primary School will ensure that written notification confirms the certificate has been obtained by ourselves.
- 16.3.2 We will be alert to the possibility that unsuitable persons may seek to gain positions within our school. By adhering to safer recruitment best practice techniques and sound employment practice in general and by ensuring that there is an ongoing culture of vigilance within our school and staff team we will strive to ensure that no unsuitable candidate ever begins working at the school due to evidence of offences involving children or due to any risk of harm to children and we will also minimise the opportunities for extremist views to prevail that might put children at risk of radicalisation.
- 16.3.3 At least one staff member that sits on interview panels, including the headteacher, will undertake level 3 training in Safer Recruitment once every two years.
- 16.3.4 All members of staff, from ancillary to teaching staff, are appointed subject to successful clearance of a Barred List check, a DBS check, an identity check, a qualifications check and subject to character and professional references being received. Checks will also be made to ascertain whether the staff members are disqualified from working in a school and whether any Prohibition Orders exist against them or other sanction or restriction placed by an EEA regulation authority. Whilst staff members can begin working before a DBS check has cleared, this is only if the Barred List checks, Disqualification checks<sup>9</sup> (for staff working with or managing provision/childcare for children under the age of 8) (including

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<sup>8</sup> Keeping Children Safe in Education DfE 2024

<sup>9</sup> Disqualification under the Childcare Act 2006 Statutory guidance for local authorities, maintained schools, independent schools, academies and free schools, DfE, 2015

Disqualification by Association) and Prohibition Orders checks (teachers and school leadership members only) (including prohibition from management of a school) have been successful and only if they are supervised by another member of staff already successfully vetted. A section 128 direction will show on an enhanced DBS check with barred list information (provided that 'children's workforce independent schools' is specified in the parameters for the barred list check). Maintained school governors should have a section 128 check. The Teacher Services system is used to verify any award of qualified teacher status (QTS) and the completion of teacher induction or probation periods. When any information about past disciplinary action or allegations is disclosed through references, it should be considered as part of the suitability assessment.

- 16.3.4 The school follows the safer recruitment procedures in the statutory guidance: Keeping Children Safe in Education, DfE, 2024.
- 16.3.5 Any member of staff considered unsuitable to work with children will be referred to the Disclosure and Barring Service (DBS) after his/her resignation or removal from the school. Additionally, a *teacher* deemed unsuitable to work with children will *also* be referred to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.
- 16.3.6 If a member of staff has lived abroad over the age of 10 or has been abroad for longer than three months, we request a police check/certificate from the police department in the locality in which they resided. If the staff member is unable to obtain this, the school will write to the relevant authority of the country in which the staff member resided, to obtain this or a verification that criminal records or concerns do not exist in their country for the staff member, in line with DfE guidance at <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>.
- 16.3.7 All adults on site from other organisations such as supply agencies, universities or other schools will be subjected to similar checks as in 14.3.4 above, by requesting written confirmation, and in line with Part 4 of the independent schools standards, that all the appropriate checks have been carried out and the adult has been judged by the organisation to be suitable to work with children.
- 16.3.8 We regard all information relating to individual child protection issues as confidential, and we treat this accordingly. We only pass information on to appropriate persons
- 16.3.9 For all other staff members who have an opportunity for regular contact with children who will not be engaging in regulated<sup>10</sup> activity (e.g. supervised volunteers who regularly teach or look after children e.g. parents supporting reading) an enhanced DBS check which does not include a barred list check will be conducted. This also applies for contractors who would have the opportunity for contact with pupils and work unsupervised under a temporary or occasional contract. Contractors that work without a check are always supervised by the school caretaker or another delegated member of staff. Contractors engaging in regulated activity will require an enhanced DBS check.

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<sup>10</sup> In summary, a person will be considered to be engaging in regulated activity if as a result of their work they: • will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or • will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or • engage in intimate or personal care or overnight activity, even if this happens only once. Keeping Children Safe in Education, DfE, July 2024



16.3.10 Risk assessments will be recorded when deciding whether to get an enhanced DBS check for any volunteer not engaging in regulated activity.

## **16 Health & Safety**

16.1 Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children physically within the school environment, including the use of the internet and outside of the school. Our School Excursions policy details measures taken to protect pupils when away from the school on school trips and visits. We have both generic and individual risk assessments for staff and children, for in-school and for off-site activities.

## **17 After School Services**

17.1 “Working together to Safeguard Children” recognises that pre-school children and the extended use of school premises play an important part in the lives of large numbers of children. Professionals working within these settings should know how to recognise and respond to the possible abuse or neglect of a child.

17.2 All organisations or services including private, voluntary and those that must be registered by Ofsted under the Children Act 1989 should have a written statement as outlined by “Working Together 2023” and “The London Child Protection Procedures 5<sup>th</sup> edition”. This statement should clearly set out staff members responsibilities for reporting suspected child abuse or neglect and should include telephone numbers for the local police and Children’s Social Services.

## **18 Incidents of racism**

18.1 Racism is not accepted at Harmony Primary School. Incidents will be dealt with under the school’s behaviour development policy and/or the anti-bullying policy. In addition, repeated racist incidents or a single serious incident may lead to consideration under child protection procedures, as relevant, e.g. as radicalisation.

## **19 Anti-Bullying & Cyber Bullying**

19.1 The school acknowledges that bullying causes great harm and suffering to its victims and is justifiably a safeguarding issue

21.2 The school believes that bullying has no place in the school. It is passionate about creating a warm and positive climate at the school such that caring and good manners towards each other are parts of its hallmarks and works towards it by promoting emotional and behavioural growth and self governance in pupils. It teaches pupils to understand that differences are a part of life, whether physical and inanimate such as the views and beliefs of people. It teaches pupils to tolerate and respect others.

22.3 The school’s policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying, including cyber bullying and homophobic bullying, may lead to consideration under child protection procedures and the disciplinary code set out in the school’s behaviour management policy. All victims of bullying will be dealt with sensitively and compassionately and will be offered support to overcome the trauma of their ordeal.

## **20 E-Safety**

- 20.1 The school has appointed an eSafety Officer to champion, lead and monitor the effective education of students and staff to prevent incidents occurring, and to liaise with the LA and the Safer Internet Centre as necessary to ensure effective response to significant incidents should they occur. This is the Headteacher at Harmony Primary School. ESafety incidents will be recorded in the standard school incident management system and be managed using the school's current pastoral and behaviour management strategies and also section 8 above.
- 20.2 An eSafety incident is an occasion where the misuse of technology has had a negative impact on the safety, security or well-being of pupils or staff members.
- 20.3 The school has installed a firewall, appropriate filters and monitoring to prevent misuse, accidental exposure to unsuitable material and eSafety incidents through use of its IT facility and the internet by pupils. Sites deemed unsuitable by the filter are blocked from access, SENSO Cloud is used to monitor internet activity and alert senior leaders on violations. The eSafety officer generates a weekly report of blocked sites from the filter along with the login details of the person attempting to access them. These are checked each week, examining the nature of the websites blocked. Anyone attempting to access websites that would jeopardise the safety, security or well-being of pupils or staff members would be considered for intervention measures such as DSL and headteacher intervention, parental intervention, a safeguarding referral or a channel referral.
- 20.4 Each classroom also contains a password protected PC for staff use. Our Bank of Laptops can only be used by pupils strictly under staff supervision.
- 20.5 Internet sites needed for use in lessons must be researched and vetted for their suitability by teachers before lessons at the planning stage, to ensure they are appropriate.
- 20.6 Pupils must never be allowed to use staff accounts to work on PCs or to access the internet.
- 20.7 Internet use must be closely supervised and monitored at all times by the class teacher and teaching assistant.
- 20.8 Any child found to be trying to access inappropriate material on the computers must be taken to the headteacher and the usual investigative and disciplinary protocols adhered to. Such occurrences and any other eSafety incident must also be immediately reported to the school's DSL and eSafety officer.
- 20.9 All rules apply even if groups of children have used the room temporarily or for other lessons.
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- 20.10 The school recognises that a lock-down approach is not the best way to safeguard pupils as found in recent research conducted by Ofsted<sup>12</sup>. Thus we believe teaching pupils how to deal with the threats posed by the internet is a much better approach which the school will aim to follow. (Appendix 6)
- 20.11 Safe internet use is now taught to pupils at Key Stages One and Two as part of the new National Curriculum (2013) for Computing. The school also regularly delivers parental workshop on the subject for all parents and invites speakers in to deliver workshops to pupils, for example representatives of the Police service.
- 20.12 Research also demonstrates that pupils are at a higher risk of cyber bullying than they are from sexual grooming or viewing content of a sexual or pornographic nature. Our curriculum

for safety is part of our **PSHE curriculum** and reflects this balance of risk.

- 20.13 All parents are encouraged to sign an eSafety agreement in entry to Harmony Primary School.
- 20.14 It is the duty of every staff member to ensure they maintain professional relationships with any pupil that might make contact with him/her outside of school hours, including online and on social networking websites or apps, behaving and communicating with the dignity and decorum expected of a member of staff at Harmony Primary School and a member of the teaching profession. All staff members must ensure there is nothing on the internet that might compromise that, such as, for example inappropriate pictures or messages. Contraventions of this would be dealt with by invoking the school Disciplinary policy, staff code of conduct, Teacher's Standards and, if relevant, the Safeguarding Policy.
- 20.15 Harmony Primary School will work to inform and updated parents and guardians with regards to harmful online challenges and hoaxes. Parents will receive timely and clear information to support a healthy approach to E-safety in the home.

## 21 Radicalisation

- 21.1 From 1 July 2015 specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard<sup>13</sup> to the need to prevent people from being drawn into terrorism<sup>14</sup>". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ("the Prevent guidance"). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools.
- 21.2 Harmony Primary School's Islamic ethos emphasises the importance of citizenship and doing good unto all others, education and the rule of law. The school is cognisant of its duty to ensure that pupils learn to serve and care for all others and work towards making a positive contribution to society as a fulfilment of Islamic teaching and duties. The school makes clear to staff and pupils that acts of extremism and terrorism, and the beliefs that encourage them, are unacceptable to Islam and that there is no place for extremist views in the school, whether from internal sources – pupils, staff or governors, or external sources - school community, external agencies or individuals.

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<sup>12</sup> The safe use of new technologies, Ofsted 2008

<sup>13</sup> According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

<sup>14</sup> "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

- 21.3 The school refers to the government definitions for extremism and radicalisation given in its Prevent Strategy<sup>15</sup> quoted as:

*Extremism is 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; and/or calls for the death of members of our armed forces, whether in this country or overseas*

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

- 21.4 Education is a powerful weapon against extremism and radicalisation. It equips young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.
- 21.5 Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and where appropriate, dealt with in line with our Behaviour Policy for pupils and the Code of Conduct and Disciplinary Policy for staff.
- 21.6 Staff members and governors must raise any concerns they have regarding extremism and radicalisation with the DSL in the first instance. The DfE has also advised that the local police can be contacted or 101 dialed or their own helpline used (020 7340 7264) or an email can be sent to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk).

### ***Role of Staff Members***

- 21.7 Staff at Harmony Primary School are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times pupils may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.
- 21.8 Staff at Harmony Primary School will be alert to the fact that extremism and radicalisation are safeguarding issues. They also recognise that if they fail to challenge extremist views they are failing to protect and educate pupils. They also understand the importance of being role models for pupils.
- 21.9 Staff members understand the importance of building the resilience of pupils against radicalisation through the excellent teaching of key curricular topics, aiming to develop the critical reasoning skills and confidence of pupils. They also ensure that the use of IT facilities at the school is properly supervised so that pupils are not exposed to any risk of falling prey to radicalising influences online at the school and are taught how to avoid those who might groom them online outside of the school too.
- 21.10 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff members have to be alert to changes in children's behaviour which could indicate that they may be in need of 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.

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<sup>15</sup> Prevent Strategy, HM Government, 2011

- 21.11 As part of wider safeguarding responsibilities school staff are trained to be alert to signs and indicators laid out in training and detailed in the three dimensions of the government's Channel Vulnerability Assessment framework (engagement, intent and capability) including, but not limited to:
- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out.
  - Graffiti symbols, writing or art work promoting extremist messages or images
  - Pupils accessing extremist material online, including through social networking sites, whether at home or elsewhere
  - Parental reports of changes in behaviour, friendship or actions and requests for assistance
  - Partner schools, local authority services, and police reports of issues affecting pupils in other schools or settings in the locality
  - Pupils voicing opinions drawn from extremist ideologies and narratives
  - Comments made that indicate association with individuals or groups known for extreme or radical beliefs, teachings or actions
  - Views expressed that dehumanise other groups of people
  - Threats to harm others
  - Access to weapons
  - Travel to conflict zones
- 21.12 If a staff member working in Harmony Primary School (including supply staff, visiting staff, volunteers' contractors, and students on placement) should become concerned that a pupil is demonstrating signs and indicators of being at risk of radicalisation, s/he must invoke the full terms of the Safeguarding policy and report the matter immediately to the Designated Safeguarding Lead. Staff are also asked to refer their queries to the DSL following the maxim: 'when in doubt, ask'.
- 21.13 The standard form for reporting Safeguarding concerns must be used to report concerns that a child is at risk of radicalisation.
- 21.14 School staff must never claim to communicate on behalf of Harmony Primary School on externally-facing or third party social media tools including blogs, wikis, discussion forums/ chat tools, etc unless authorised by the headteacher.
- 21.15 Staff members are required to exercise caution to avoid blurring professional boundaries with parents and pupils with whom they may have personal ties. Confidentiality and professional curiosity must be maintained at all times to ensure high standards of professional integrity and the safeguarding and well-being of all pupils, including those to whom staff members may have personal ties. This applies to face to face interactions as well as to those that occur over the phone or on social media. Personal ties can put the safeguarding of pupils at risk as they lend themselves to uncritical and emotional assumptions about a child's well-being.

***Role of the Designated Safeguarding Lead (DSL) in preventing radicalisation***

- 22.14 The Designated Safeguarding Lead works in line with the responsibilities as set out at Annex B of the DfE Guidance 'Keeping Children Safe in Education'. The Designated Safeguarding Lead is the focus person and local 'expert' for school staff, and others, who may have concerns about an individual child's safety or well-being and is the first point of contact for external agencies. At Harmony Primary School the role of the Designated Safeguarding Leader is extended to include the responsibilities of the PREVENT strand of

the Government's counter-terrorism strategy.

- 22.15 The Designated Safeguarding Leader will gather information from staff members, examine its credibility and using the knowledge gained from her training and guidance such as the Channel Duty Guidance and Vulnerability Assessment Framework<sup>16</sup> to decide whether a referral is needed.
- 22.16 The Designated Safeguarding Leader will make referrals to Social Services where information gathered indicates that a child is at risk of radicalisation, as set out in section 4 above.
- 22.17 The Designated Safeguarding leader will also make a referral to Channel if the pupil demonstrates vulnerability to being drawn into terrorism through signs and indicators across all three spheres of the Channel Vulnerability Assessment Framework. She will email the referral to the Harrow Coordinator for Prevent details available at <https://www.harrowscb.co.uk/radicalisation-and-extremism-2/>

### ***Assessing risk***

- 22.18 The school takes it duty to assess the risk of children being drawn into terrorism, or extremist ideas that are part of terrorist ideology, very seriously. It works in partnership with the borough Prevent Coordinator to assess local risks and with social services to assess risk to individual pupils. Information provided by these sources, as well as any provided by the local police department, Met Police Harrow, is used to plan the level of provision needed at the school to respond to the need demonstrated.
- 22.19 In addition, using a risk assessment template provided by the Prevent Coordinator, the DSL also audits the school's provision and creates a provision map that reveals action points for further development of the school's capability to protect pupils against the risk of radicalisation. See Appendix 15.

### ***Staff training***

- 22.20 Whole school in-service training on Safeguarding is organised for staff and governors at least once every three years and complies with the prevailing arrangements agreed by the Local Authority and the Harrow Local Safeguarding Children Board (HSCB) and will, in part, include training on extremism and radicalisation and its safeguarding implications.
- 22.21 The Designated Safeguarding Leader will attend Harrow and HSCB training courses as necessary, at least every two years, again this will include training on extremism and radicalisation and its safeguarding implications.
- 22.22 In addition, the Designated Safeguarding Leader attends WRAP training provided by the local Prevent Coordinator and also completes the online course on Channel Awareness. She uses this training to keep staff updated and to sharpen the staff body's recognition of signs and indicators of extremism and the confidence, knowledge and skill to challenge it.

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<sup>16</sup> Channel Duty Guidance, HM Government 2023

- 22.23 The Designated Safeguarding Leader also arranges WRAP (Workshop to Raise Awareness about Prevent) training for the staff body and governors at least once every two years and ensures new staff members are also aware of their duties and receive appropriate training.

### ***IT policies***

- 22.24 The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools. For this reason the school outlines rules and procedures for the use of the internet and school IT facilities for pupils and staff members. These can be found in the school's Computing policy, the Acceptable Use of IT Policy for staff members and the Staff Code of Conduct.

The school ensures that pupils only access the internet under adult supervision. In addition it ensures that suitable filtering is in place to ensure pupils do not come across unsuitable material online. The school is also conscious of its duty to equip pupils with the skills to keep themselves safe online, both in school and outside. Internet safety is an important component of the school's computing curriculum. General advice and resources for schools on internet safety are available on the UK Safer Internet Centre website.

- 22.25 Teachers are also trained to be aware of the risks posed by the online activity of extremist and terrorist groups and are provided with the government's guidance on the use of social media and the internet to radicalise young people and provided with a copy of the relevant governmental guidance on this issue (Appendix 13)<sup>17</sup>.

### ***Working in Partnership***

- 22.26 The school works with the local Prevent Coordinator, the Local Safeguarding Children Boards (LSCBs), Social Services and the police as needed and when called on for support, guidance, training, risk assessment and referrals. It will work in partnership with these and any other governmental agency or civil organisation to ensure it has effective provision in place.
- 22.27 The school recognizes that parents and families are the first and most impactful teachers and schools in the lives of children. Effective engagement with parents and the family is key to fostering excellent pupil outcomes in any area. Educating parents and the family about Prevent and how to raise concerns to receive support is thus also a focus of school work.

### ***Building resilience***

- 22.28 Harmony Primary School builds the resilience of its pupils against radicalisation by providing a broad and balanced curriculum designed to promote good citizenship which is delivered by skilled professionals, so that the lives of pupils are enriched and they become tolerant and understanding of difference and diversity and also to ensure that they thrive and feel heard and valued.
- 22.29 The school curriculum reflects the requirements for the spiritual, moral, social and cultural development of pupils in *The Education (Independent School Standards) (England) (Amendment) Regulations 2014* to promote British values and the need to build the resilience of pupils against radicalisation, through the curriculum and through good teaching. The school aims to embrace and nurture positive and confident identities and prepare pupils for life in modern Britain and beyond.

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<sup>17</sup> HOW SOCIAL MEDIA IS USED TO ENCOURAGE TRAVEL TO SYRIA AND IRAQ BRIEFING NOTE FOR SCHOOLS, HM Government & DfE, 2015

The school's curriculum features relevant topics appropriate to the age and needs of pupils throughout Personal, Social, Health and Citizenship Education, Social and Emotional Aspects of Learning (SEAL), Islamic Studies and assemblies SEAL helps pupils understand and manage difficult situations, recognise and manage risk, make safer choices and develop effective ways of resisting pressure. The school's student council are

also an example of how pupils are encouraged to debate and make reasoned arguments, make choices and make a positive difference to the school. Pupils also work with pupils of diverse backgrounds from otherschools as part of the School Linking Project with the 3 Faiths Forum or other partnerships. In RE the students will learn to enhance their understanding of the diverse identities of the peoples of the UK.

- 22.30 In addition pupils see the school as a safe and trusted place where they can questions events and issues that worry them and explore controversial issues safely as teachers understand their religious and cultural backgrounds and listen to and respond to pupils to help develop their understanding and learning.
- 22.31 The school will ensure that teaching approaches help pupils to build resilience to extremism through the development of critical thinking skills and a sound grounding in Islamic teaching to expose the fallacy of religious justifications for terrorism and extremism. It will also seek to help pupils develop the ability to resist the pressure of those seeking to impose their views and radicalise others, and understand how to get help. The school will also pay regard to relevant approaches outlined in the Governmental guidance 'Teaching approaches that help build resilience to extremism among young people' DfE 2011.
- 22.32 Furthermore, through developing the use of peer mediation and conflict resolution, the school aims to foster mutual respect and understanding between pupils and to promote the use of dialogue, not violence, as a form of conflict resolution.

### ***Use of External Agencies and Speakers***

- 22.33 At Harmony Primary School we encourage the use of external agencies or speakers to enrich the experiences of our pupils, however we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences. To do this we will ask all staff members who wish to bring speakers to the school or to have speakers address pupils outside of the school, to complete the school's standard form for such requests at least two weeks prior to such engagements. Staff members will pass this back to the Headteacher, who will vet speakers for suitability and advise the Board of governors of all such speakers. If they are in any doubt about the suitability of any speaker, they will consult the designated governors for Safeguarding, if needed, for their support in scrutinising and vetting. All vetted speakers will be added to the school's log of speakers maintained by the Headteacher.
- 22.34 Staff members are also responsible for ensuring any material to be shown or given to pupils is checked in advance.
- 22.35 Such vetting is to ensure that we do not unwittingly use agencies or individuals that contradict each other with their messages or that are inconsistent with, or are in opposition to the school's values and ethos. We must be aware that in some instances the work of external agencies may not directly be connected with the rest of the school curriculum so we need to ensure that this work is of benefit to pupils.
- 22.36 Our school will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:
- Any messages communicated to pupils are consistent with the ethos of the school and do not marginalise any communities, groups or individuals
  - Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other



ideologies

- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication.
- Activities are matched to the needs of pupils
- Activities are evaluated to ensure that they are effective

22.37 We recognise, however, that the ethos of our school encourages pupils to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this.

22.38 Therefore by delivering a broad and balanced curriculum, augmented by the use of external sources where appropriate, we will strive to ensure our pupils recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability and also help pupils develop the critical thinking skills needed to engage in informed debate.

### ***Whistle Blowing***

22.39 Staff members will be encouraged to make use of our Whistle Blowing guidelines if they have any concerns of extremism or radicalisation regarding a staff member. Such arrangements are also set out above in section 11 and apply fully to allegations and concerns of extremism, as they do to any aspect of school work e.g. financial.

22.40 If a staff member has reason to suspect that any other staff member is making extreme statements, radicalising pupils, marginalising groups, glorifying criminality or extremism. S/he should employ the whistle blowing procedure at once.

22.41 If the concerns about such behaviour relate to the headteacher of the school, s/he should alert the LADO.

22.42 Such behaviour is contrary to the Staff Code of Conduct and will be dealt with under the school's Disciplinary Policy. Where such misconduct by a teacher is proven, the matter will be considered for referral to the National College for Teaching and Leadership in case a Prohibition Order is warranted. Such misconduct proven against any staff member will also be referred to the Disclosure and Barring Service. In addition, such misconduct proven against a member of EYFS staff will also be reported to Ofsted within 14 days.

## **22 Honour Based Violence**

22.1 So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead.

### 23.1.2 Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of [the Multi-agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the [Multi-agency guidelines: Handling case of forced marriage](#).

### 23.1.2 Actions

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

## 22.2 FGM

21.2.1 The school is committed to safeguarding all its pupils. It believes that female genital mutilation is an abusive practice popular in certain parts of the world and is aware that it is a criminal offence under UK law. It trains staff in line with the 'Keeping Children Safe in Education' 2024, DfE guidance and the Department of Health's 'Female genital mutilation: multi-agency practice guidelines' 2011, to look out for signs to prevent pupils being subjected to such abuse as well as signs that pupils may have already been subjected to it.

21.2.2 If a staff member notices any of the signs that a child might be about to undergo the procedure, s/he must invoke the terms of this Safeguarding policy and report the matter at once to the DSL, who will make a child protection referral.

21.2.3 If a staff member discovers (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a pupil, this must be reported to the police<sup>18</sup>. Staff members (other than teachers) are required to report all discoveries regarding FGM to the school's DSL, who will call the police. *If a teacher discovers (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a pupil, this must be reported to the police immediately by the teacher who discovered it.* The teacher must also inform the DSL (or deputy DSL) and headteacher immediately, who will make a child protection referral. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Those failing to report such cases will face disciplinary sanctions.

## 22.3 Forced marriage

21.3.1 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. Schools and colleges can play an important role in safeguarding children from forced marriage.

23.3.2. The Forced Marriage Unit has published [Multi-agency guidelines](#)<sup>19</sup>, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

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<sup>18</sup> Section 5B(11) of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) -

<sup>19</sup>

23.3.2 If a staff member suspects that a child is being forced into marriage s/her must immediately inform the DSL in line with the usual procedures set out above. The DSL will gather information, consult with Harrow Safeguarding Services and make a referral if needed.

23.3.3 If forced marriage has been carried out, along with a child protection referral, the headteacher will call the police to report the crime.

## **22.4 Serious Violence**

Serious violent crime has increased in recent years especially crime involving weapons and criminal activity.

23.4.1 Staff have a duty and a responsibility to protect the children from this sort of crime.

23.4.2 All staff should be aware of the indicators, which may indicate that children are at risk from or are involved with serious violent crime.

## **23 Cameras and mobile phones**

23.1 No staff member is permitted to take pictures of pupils on their personal mobile phones or other such personal technological devices. Staff members must keep phones out of sight and use them only at break times in staffrooms or offices when not engaged in active or passive supervision of pupils or in teaching.

23.2 A school camera for is kept locked in the school office. Teachers and teaching assistants are required to collect and return them each day to use to take pictures of trips, enrichments activities, displays or school work. Transfer of all photos/videos or audio from school cameras and iPads must be to school drives only.

23.3 No staff member is permitted to keep data on or pictures of any pupil on any personal device at anytime. No picture or video can be taken for school purposes without prior parental consent obtained in writing. This is kept in a class log that follows each class through the school and must be consulted before pictures or videos are taken.

23.4 No staff member is permitted to transfer pictures and videos of pupils onto personal devices or onto any form of social media, or to email them to anyone. All pictures and videos must be saved in the appropriate folder. Pictures and videos can only be used in accordance with parental consent and instructions and school instructions.

**24** Upskirting' 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. It is now a criminal offence.

## **25 Security**

25.1 We have an intercom system and camera at the main door of our school. We ascertain the identity of all visitors before allowing them into the building.

25.2 We have electronic locks on the doors in the reception area of the school. These are activated by reception staff when they allow people through the main door.

25.3 Once the reason for the visit is established, the visitor is asked to sign it, wear a visitor badge and take a seat in the waiting area.

- 25.4 All routes into the school are reviewed regularly and fences upgraded and repaired as necessary to ensure intruders cannot enter the school to jeopardise the Safety of our pupils.
- 25.5 No un-vetted member of the public or school community is allowed access to our pupils. In order to have unsupervised access, a visitor that has authorisation from an external agency (for example Social Services) must have evidence of a valid DBS check that demonstrates a lack of risk to children. They must also give proof of identity.

## **26 Lost child procedures**

- 26.1 This is a separate policy document – please refer to The Lost Pupil Procedure.

## **27 Child Missing Education**

- 27.1 A child going missing from education is a potential indicator of abuse or neglect. Staff members must carefully follow the school's procedures, as outlined here and in the pupil attendance policy, for dealing with children that are absent for long periods, or are absent without explanation, particularly on repeat occasions, to help identify the risk of abuse, neglect and sexual exploitation, and to help prevent the risks of their going missing in future.
- 27.2 The law requires the school to have an admission register and an attendance register. All pupils will be placed on both registers. The school will place pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupils will attend the school. If a pupil fails to attend on the agreed or notified date, the school will notify the local authority at the earliest opportunity to prevent the child from going missing from education.
- 27.3 The admission register will be kept accurately and up to date. The school will regularly encourage parents to inform it of any changes whenever they occur to help the school and local authority when making enquiries to locate children missing education.
- 27.4 The school will monitor attendance and address it when it is poor or irregular.
- 27.5 Where a parent notifies the school that a pupil will live at another address, the school will record in the admission register:
- the full name of the parent with whom the pupil will live;
  - the new address; and
  - the date from when it is expected the pupil will live at this address.
- 27.6 Where a parent of a pupil notifies the school that the pupil is registered at another school or will be attending a different school in future, schools will record in the admission register:
- the name of the new school; and
  - the date on which the pupils first attended or is due to start attending that school.
- 27.7 The Pupil Attendance Officer, will inform the local authority, within 5 days of the decision, of any pupil who is going to be deleted from the admission register under any of the fifteen grounds listed in the regulations<sup>20</sup>, including if the child:

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<sup>20</sup> The Education (Pupil Registration) (England) Regulations 2006

- has been taken out of school by his/her parents and is being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school;
- has been certified by their GP, consultant physician or hospital, as unlikely to be in a fit state of health to return to school before the end of year six; or,
- has been permanently excluded.

This duty does not apply when a pupil's name is removed from the admission register at standard transition points – when the pupil has completed the final year of education normally provided by that school – unless the local authority requests that such returns are to be made.

- 27.8 The Pupil Attendance Officer, will also inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days, as close as conveniently possible to the 10<sup>th</sup> day of absence. The contact is:  
Children Missing from Education officer, email address: [Missing.missing@harrow.gov.uk](mailto:Missing.missing@harrow.gov.uk)
- 27.9 When removing a pupil's name, the notification to the local authority must include: (a) the full name of the pupil, (b) the full name and address of any parent with whom the pupil normally resides, (c) at least one telephone number of the parent, (d) the pupil's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the pupil's name is to be removed from the admission register.
- 27.10 The school will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register if the deletion is under regulation 8(1), sub-paragraphs (f)(iii) and (h)(iii). The school will also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is missing education, such as any safeguarding concerns.
- 27.11 The school will also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point. The notification will include all the details contained in the admission register for the new pupil. This duty does not apply when a pupil's name is entered in the admission register at a standard transition point – at the start of the first year of education normally provided by that school – unless the local authority requests that such returns are to be made. When adding a pupil's name, the notification to the local authority must include all the details contained in the admission register for the new pupil.

## **28 Child sexual exploitation**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who use 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.

28.2 If a staff member suspects that a child is being sexually exploited, she/he must inform the DSL immediately who will make a referral if needed.

## **29 County Lines**

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

29.2 Signs and signals of County Lines or other forms of criminal exploitation include:

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Having a second, old phone (i.e. not a smart phone)
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly disheveled
- Having hotel cards or keys to unknown places.

29.3 Members of staff should report this as a child protection issue to the Designated Safeguarding Leads. Parents/carers should raise concerns with the relevant year team/s who can take advice on what next steps to take. Alternatively, parents/carers can report concerns directly to the police or to MASH.

## **30 Domestic Abuse**

30.1 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.

## **31 Notifications**

31.1 As part of the school's Safeguarding responsibilities, a number of different authorities have to be notified about key information at various stages and scenarios. This has been set out below to clarify matters in an effort to avoid error.

| <b>What</b>  | <b>Who</b>  | <b>When</b>                 | <b>Contact Details</b>  |
|--|---|-----------------------------|---|
| 1. Safeguarding disclosure concerning a pupil (and child referral queries)                 | Child Protection Assessment Team in LA in which child resides | Immediately                 | <p><b>Harrow</b></p> <p><b>Telephone:</b> 020 8901 2690<br/> <b>Out of hours:</b> 020 8424 0999<br/> <b>Fax:</b> 020 8861 1816<br/> <b>Secure Email:</b><br/> <a href="mailto:duty&amp;assess@harrow.gov.uk.cism.net">duty&amp;assess@harrow.gov.uk.cism.net</a></p>  |
| 2. To report allegations made against a staff member (or discuss queries).                 | Local Authority Designated Officer, Rosalind South            | Immediately                 | <p>LADO: Rosalind South Email: <a href="mailto:Rosalind.South@harrow.gov.uk">Rosalind.South@harrow.gov.uk</a> Tel: 020 8901 2690 (Mon, Tues &amp; Friday) For any other days please contact the Golden Number: 020 8901 2690(out of hours: 020 8424 0999) General referral form for practitioners</p>   |
| 3. After allegations against a staff member who is found unsuitable to work with children. | Secretary of State & NCTL (teachers), DBS (all staff)         | Within 1 month of dismissal | <p><b>DBS</b><br/> DBS barring referrals PO Box 181<br/> Darlington DL1 9FA<br/> Email <a href="mailto:dbsdspatch@dbs.qsi.gov.uk">dbsdspatch@dbs.qsi.gov.uk</a><br/> Telephone: 01325 953 795<br/> <b>Secretary of State &amp; NCTL</b><br/> NCTL Investigations Team Teacher Regulation<br/> NCTL<br/> 53-55 Butts Road, Earlsdon Park, Coventry CV1 3BH</p> |

| What   | Who  | When  | Contact Details   |
|--|--|---|---|
|  |  |   | Email Teacher Misconduct Referral Form to:<br>Regulation.DIVISION@education.gsi.gov.uk  |
| 4  | Ofsted   | Within 14 days of allegations   | <b>Ofsted</b><br>Piccadilly<br>Gate Store<br>Street<br>Mancheste<br>r M1 2WD<br>Email<br><a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a><br>Contact form<br><a href="https://contact.ofsted...">https://contact.ofsted...</a><br>General enquiries0300 123 1231<br>About schools0300 123 4234<br>About concerns0300 123 4666<br>Fax0300 123 3159<br>Monday to Friday 8am to 6pm  |
| 5. Referring a child with 'additional needs' for Early Help after obtaining parental consent and in partnership with them, using a CAF detailing identified needs. | The referral will be emailed to the CAF team at Harrow Council | As soon as consent received from parents  | <b>Golden Number: 020 8901 2690</b> between 9am and 5pm, Monday to Friday<br><b>Emergency Duty Team (operates out of hours): 020 8424 0999</b> between 5pm and 9am, Monday to Friday, 24 hours during weekends and all bank holidays<br><b>Children's Access Team</b><br><b>Civic 1, 2nd Floor, NW</b><br><b>Station Road, Harrow, HA1 2XY</b><br><b>Fax: 020 8861 1816</b>   |
| 6. Child who meets radicalisation indicators across all three dimensions of Channel Vulnerability Assessment Framework   | Harrow Channel Panel   | Immediate   | Ahmed Abdi Prevent and Gangs Co-ordinator<br><a href="mailto:ahmed.abdi@harrow.gov.uk">ahmed.abdi@harrow.gov.uk</a><br>Samia Malik Senior Professional Community Cohesion<br><a href="mailto:samia.malik@harrow.gov.uk">samia.malik@harrow.gov.uk</a><br>Or Email <a href="mailto:prevent@harrow.gov.uk">prevent@harrow.gov.uk</a><br><br>More contact info can be found at:<br><a href="http://www.harrowscb.co.uk/wp-content/uploads/2015/06/Channel-Information-Leaflet-LB-Harrow-Final.pdf">http://www.harrowscb.co.uk/wp-content/uploads/2015/06/Channel-Information-Leaflet-LB-Harrow-Final.pdf</a> |
| 7. Child missing from Education – prolonged absence  | Harrow Children Missing Education                              | Before deletion from admissions register and for a child absent for 9 days without authorisation, on the 10 <sup>th</sup> | Lead Officer for Children Missing Education<br>London Borough of Harrow<br>Education Services<br><a href="mailto:cme@harrow.gov.uk">cme@harrow.gov.uk</a>   |



|  |  |   |   |
|--|--|---|---|
|  |  | day of absence.   |   |
| 8. Child missing from Education – new admissions other than reception/school entry | Harrow Education Admissions Department | On admission of any new pupil within 5 days of adding to admissions register /admission/ joining the school | Civic Centre<br>Harrow<br>HA1 2UW<br><b>Email:</b> <a href="mailto:education@harrow.gov.uk">education@harrow.gov.uk</a><br><a href="mailto:support@eadmissions.org.uk">support@eadmissions.org.uk</a> |
| 9. General SG queries e.g. policy, local threshold framework, training             | Harrow Safeguarding Children’s Board   | As required, annually for updates, policies, update training, refresher/ repeat training.                   | Telephone number: 020 8424 1147/020 8736 6939   |
| 10. Independent School Inspectorate  | ISI                                    | As required, Immediately  | TEL: 0207 6000100 EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a>   |

## 32 Policy Review

- 32.1 The Headteacher monitors and reviews this policy and its implementation.
- 32.2 The number of child protection referrals will be monitored, together with the number of children subject to Child Protection Plans and Child in Need Plans. The DSL keeps a list of children identified as ‘in need’ or ‘vulnerable’ and monitors their attendance, attainment, behaviour and well-being.
- 32.3 The policy will be reviewed annually

## APPENDICES

(Located in: main school policies folder; key folder for policy; staff handbook)

**Appendix 1:** Keeping Children Safe in Education, DfE, 2024

**Appendix 2:** What to do if you are worried a child is being abused, DfE, 2015

**Appendix 3:** The Prevent Duty Departmental advice for schools and childcare providers, DfE, 2015

**Appendix 4:** Channel Duty Guidance HM Government 2023

**Appendix 5:** "Guidance on Safe Working Practices for the Protection of Children and Staff members in Education Settings"

**Appendix 6:** <https://www.harrowscb.co.uk/e-safety-guidance/>

**Appendix 7:** 'How Social Media is used to encourage travel to Syria and Iraq' briefing note from Home Office and the DfE

**Appendix 8:** Preventing Radicalisation Risk Assessment Harmony Primary School

**Appendix 9:** Children Missing Education, 2024, DfE

**Appendix 10:** Multi Agency Referral Form

**Appendix 11:** Harrow Council Continuum of Need Matrix:

<https://www.londonsafeguardingchildrenprocedures.co.uk/files/threshold.pdf>