

# Safeguarding and Child Protection Policy 2025-2026

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Approved by:	Hujjat Primary School Trustees
Chair of Governors:	Shaheen Hirji
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## Safeguarding Team Contacts at Hujjat Primary School

<b>Role:</b>	<b>Name and contact details:</b>
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Alternate DSL(s)	David Syed (Headteacher) Sayyeda Maryam Jessa (Faith Lead)
Named safeguarding governor	Zafar Ali
Chair of Governors	Shaheen Hirji
School Online Safety Lead	Samirah Saad (Deputy Headteacher)
Designated teacher for Children in Care and children previously in care (CiC)	David Syed (Headteacher) Samirah Saad (Deputy Headteacher)
Senior Mental Health Leads	David Syed (Headteacher) Samirah Saad (Deputy Headteacher) Sayyeda-Maryam Jessa (Faith Lead)

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## School Child Protection and Safeguarding Policy Framework

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centered. This means that they should consider, at all times, what is in the **best interest** of the child.

(Keeping Children Safe in Education)

### Ethos statement

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children. We aim to provide a safe and welcoming environment in which children can learn, underpinned by a culture of openness where both children and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe.

Hujjat Primary School will be a happy and inclusive school inspired by Islamic values. A place where children can indulge their curiosity, develop a love for learning and build the foundation to become ethical, responsible and inspirational members of society.

All staff at Hujjat Primary School understand that safeguarding children is everyone's responsibility.

We will:

- Provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- Always act in the best interests of the child, taking their wishes and feelings into account.
- Ensure that all staff and volunteers are recruited using robust 'Safer Recruitment' processes (See **Safer Recruitment Policy**).
- Aim to identify concerns early and prevent concerns from escalating. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some case, providing the lead professional in undertaking an early help assessment. See Appendix 1 and [Harrow's Help \(Early Support Offer\)](#).
- Establish and maintain an environment where children feel respected, safe, and are encouraged to talk and be listened to when they have a worry or concern.
- Require any member of staff who has a concern about a child's welfare to follow the referral process set out in this document.
- Recognise that children may not always disclose abuse and that this should not stop staff having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).
- Ensure that children who have been abused or neglected will be supported in line with a child protection plan and take whatever actions the local authority the local authority recommends.
- Work with parents/carers to build a supportive relationship and be clear about our Safeguarding and Child Protection Procedures and in particular, when we may need to refer

concerns to other agencies.

- Include opportunities across the curriculum, including PSHE for children to be taught about safeguarding and to develop the skills they need to recognise danger and know where to seek help.
- Maintain an attitude of “it could happen here” where safeguarding is concerned.

### **Why is this important to our school?**

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information or sharing information too slowly and;
- a lack of challenge to those who appear not to be taking action.

### **Contextual Safeguarding**

We recognise that some safeguarding incidents or behaviours are associated with wider environmental factors which relate to children and young peoples’ neighbourhoods and/or online communications. Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. For further information see the University of Bedfordshire’s [Contextual Safeguarding Network](#).

## **Introduction**

The board of trustees<sup>1</sup> recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Harrow Safeguarding Children’s Board.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy is for all staff, parents, trustees, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school’s Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, Online Safety Policy, Behaviour and Anti-

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<sup>1</sup> In maintained schools the governing body is responsible for ensuring their functions are exercised with a view to safeguarding and promoting the welfare of children in accordance with section 175 of the Education Act 2002, for pupil referral units it is the management committee, in independent schools, including academies and free schools, and 16-19 academies, this duty sits with the proprietor (in the case of academies the proprietor will be the academy trust). References to the board of trustees throughout this policy framework includes management committees.

Bullying Policy, Prevent strategy school's guidance on low-level concerns (Appendix D)<sup>2</sup>, Child-on-Child Abuse Policy and procedures, and Part Five of KCSiE, copies of which will be provided to all staff on induction. The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people, and ensure that all staff understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The board of trustees expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working directly with children **must**, as a minimum, have read and understand [Part One of KCSiE](#) and [Annex B](#). The board of trustees will ensure that they and senior leaders have read and understand [Parts One and Two of KCSiE](#). The board of trustees will ensure that those staff who do not work directly with children have read either Part One or Annex A of KCSiE<sup>3</sup> together with Annex B. There may be some staff whom the board of trustees require they read additional sections<sup>4</sup>.

The board of trustees will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated. The board of trustees will ensure that all trustees receive appropriate safeguarding and child protection training (including online) at induction which is regularly updated.

Compliance with the policy will be monitored by the Headteacher, designated safeguarding lead (DSL) and named safeguarding trustee.

## Statutory framework

Section 175 of the Education Act 2002 (as amended) in the case of maintained schools and pupil referral units<sup>5</sup>, Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools (including academies and free schools), the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) for post 16 education providers, place a statutory duty on governing bodies and proprietors to have policies and procedures in place that safeguard and promote the welfare of children and young people who are pupils of the school which must have regard to any guidance given by the Secretary of State.

In accordance with statutory guidance, Working Together to Safeguard Children 2018, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint responsibility for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Harrow, all schools have been named by the Harrow Safeguarding Children's Board (HSCB) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the HSCB which can be found on their website at: [HSCB](#)

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<sup>2</sup> Guidance on Low-Level Concerns may be a stand-alone policy or included within another policy e.g. Staff Code of Conduct

<sup>3</sup> Annex A of KCSiE is a condensed version of Part One of KCSiE. Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular direct contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

<sup>4</sup> The governing board of trustees may decide that for some roles should read additional parts of the guidance e.g. colleagues involved in safer recruitment administration including the maintenance of the single central record should also read Part Three of KCSE.

<sup>5</sup> Section 175, Education Act 2002 – for management committees of pupil referral units, this is by virtue of regulation 3 and paragraph 19A of Schedule 1 to the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007

## Key roles and responsibilities

### The Board of Trustees

The board of trustees has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The board of trustees has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare. The board of trustees will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The board of trustees will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The board of trustees will ensure that where there is a safeguarding concern school leaders will make sure the child's needs and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The board of trustees will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The board of trustees will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of children and young people as appropriate:

- Child-on-child abuse
- Online safety and acceptable use policy
- Behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Special educational needs and disability
- Supporting pupils in school with medical conditions
- Staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of it, including the use of mobile devices and communications, including the use of social media.)
- Procedure for responding to children who go missing from education, particularly on repeat occasions.
- Safer recruitment
- Prevent strategy

It is the responsibility of the board of trustees to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the pupils who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low-level concerns involving, members of staff (including the headteacher, supply teachers, contractors, and volunteer helpers).

The board of trustees will ensure that there is a named trustee for safeguarding, a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for safeguarding and child protection, and a designated teacher to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training. The board of trustees will have regard to their obligations under the Human Rights Act 1998 and the [Equality Act 2010](#) (including the Public Sector Equality Duty).<sup>6</sup>

The board of trustees will inform London Borough of Harrow Council and the HSCB annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

### **Designated Safeguarding Lead (DSL)**

The DSL will take lead responsibility for safeguarding and child protection (including online safety including and understanding the filtering and monitoring systems in place). This will be made explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex C of KCSiE).

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively. The DSL and Deputy DSL's will ensure that Level 3 Safeguarding training is updated every two years and safer recruitment training is updated every three years

The DSL and any alternate DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

During term time, the DSL and/or an alternate should always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role and is expected to update their knowledge and skills at regular intervals to allow them to keep up with developments relevant to their role. All Deputy DSL postholders are subject to the same training requirements as the DSL.

The DSL will liaise with the headteacher to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.<sup>7</sup>

### **Headteacher**

The headteacher will ensure that the policies and procedures adopted by the board of trustees are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

### **All staff**

All staff have a responsibility to provide a safe environment in which children can learn.

All staff working directly with children must read and ensure they understand at least Part One of KCSiE. Those staff that do not work directly with children must read and ensure they understand either at least Part One or Annex A of KCSiE.<sup>8</sup>

All staff must ensure they are familiar with the systems within school which support safeguarding, including the child protection and safeguarding policy, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

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<sup>6</sup> Set out in paragraphs 83-93 of KCSiE

<sup>7</sup> See LA explanatory note on the requirements around children having an appropriate adult [Schools-StopSearch-v2.3.pdf \(squarespace.com\)](#)

<sup>8</sup> Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should know what to do if a child tells them he/she is being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity, such as knife crime, or involved in county lines drug dealing.

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

All staff should be aware of, and understand their role within the [Early Help process](#) for all services, at both a Local Authority and school or college level. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs (see Section 12: Information Sharing).

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (SEN) (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or forced marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day ( School liaises with Attendance and Children's Services)

Knowing what to look out for is vital to the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Details of the school's safeguarding team are on the front this policy.

## Induction and training

The board of trustees will ensure that all staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with advice from the HSCB. In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-levels concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE (or Annex A for those staff who do not work directly with children)<sup>9</sup> will be provided to new staff at induction. The governing body/proprietor will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly. In considering safeguarding training arrangements the governing body/proprietor will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.

## Recognising concerns – signs and indicators of abuse.

All staff should be aware of indicators of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

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

All staff should consider whether children might be at risk of abuse or exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse and abusive relationships in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL.

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<sup>9</sup> Dependent on school stance on the condensed version of KCSiE. Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

## Indicators of abuse and neglect

**Abuse** is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

The following indicators listed under the categories of abuse are not an exhaustive list:

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of the school's policy and procedures for dealing with it. Staff should be aware that early sexualized behaviour including sexual comments can be a sign of sexual abuse. (See section 7: Specific safeguarding issues) *[schools should cross-reference their school policy/procedures for dealing with child-on-child abuse within the school's Child Protection and Safeguarding Policy]*

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

(Source Keeping Children Safe in Education)

## Specific safeguarding issues

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

## **Child-on-child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) and record these using the school's safeguarding system CPOMS (see Appendix A for guidance on raising concerns).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos<sup>10</sup> (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should be clear about the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

## **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved

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<sup>10</sup> UKCIS guidance: Sharing nudes and semi-nudes advice for education settings.

in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

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

### **Domestic Abuse and Abusive Relationships**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That's 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.

### **Female Genital Mutilation (FGM)**

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers<sup>11</sup>. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Mental Health**

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

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

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's policy, and speaking to the DSL or a deputy.

We recognise that without appropriate intervention and support, abuse or witnessing violence may have an adverse impact on children which may last into adulthood.

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<sup>11</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

Our school will support pupils through:

- Curricular opportunities to encourage self-esteem and self-motivation
- An ethos that actively promotes a positive, supportive and safe environment and values the whole community
- Liaison with other agencies which support the pupil such as Social Care and Child and Adolescent Mental Health Services (CAMHS)
- Our school's behaviour policy will support vulnerable pupils in the school. Our staff will agree a consistent approach that focuses on the behaviour of the child but does not damage the pupil's sense of worth.

### **Serious violence**

All staff should be aware of the indicators which may signal that children are at risk from, or involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

## **Children potentially at greater risk of harm**

The board of trustees recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them.

### **Children who need a social worker (Child in Need and Child Protection Plans)**

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

The board of trustees expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made (and information shared) in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and school to safeguard and promote the welfare of children.

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

### **Children absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system

- Cease to attend a school
- Come from new migrant families

It is important that the school's procedures for unauthorised absence and for dealing with children who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to LA children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's unauthorised absence procedures and children missing education procedures: Attendance policy.

This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

Further information and support includes:

- schools' duties regarding children missing education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: [Children Missing Education](#).
- General information and advice for schools can be found in the Government's [Missing Children and Adults Strategy](#).
- further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#)
- guidance for schools concerning children who are absent from education [Working Together To Improve School Attendance](#)

### **Elective Home Education**

Many home education children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will work together with the LA and other key professionals to coordinate a meeting with parents/carers where possible.

Ideally this would be before a final decision has been made to, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child has an Education, Health and Care plan in place the LA will need to review the plan, working closely with parents and carers.

### **Children staying with friends or relatives**

The school will follow Harrow local authority procedures when a child stays with host families for periods specified.

### **Children requiring mental health support**

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

The board of trustees will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system.

Staff can access further advice in a DfE guidance documents [preventing and tackling bullying](#) and [mental health and behaviour in schools](#) which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of pupils.

The school's senior mental health lead will be a member of, or be supported by, the senior leadership team.

### **Looked after children and previously looked after children.**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The board of trustees will ensure staff have the skills, knowledge and understanding to keep looked after children safe.

The board of trustees will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The board of trustees recognise that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

For children who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

**Children with SEN and disabilities, or health issues** can face additional safeguarding challenges, both online and offline.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Staff should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Staff also need to be mindful of children's cognitive understanding, for example, whether they are able to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in school.

As such, any reports of abuse involving children with SEND will require close liaison with the DSL and SENDCO.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

## **Opportunities to teach safeguarding**

The board of trustees will ensure that children and young people are taught about how to keep themselves and others safe, including online.

The board of trustees recognise that effective education should be tailored to the specific needs and

vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

Relevant topics will be included within Relationships Education and through Personal Social Health and Economic sessions, having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

The board of trustees expect that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

## Online safety and filtering and monitoring

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

The board of trustees has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety, and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

Online safety issues can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example, misinformation, disinformation, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation or extremism;
- Contact: being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- Conduct: online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying); and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group

(<https://apwg.org/>).

The board of trustees will ensure that an annual review is undertaken of the school's approach to online safety including the school's filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks pupils face online. The review should include a member of the senior leadership team, the DSL, the IT service provider and a trustee. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at [Cyber security training for school staff - NCSC.GOV.UK](#) (includes cyber resilience).

We ensure that we have effective mechanisms to identify, intervene in, and escalate any online safety incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

Staff are made aware of the school approach to online safety, including:

- Creating a safer online environment – including training requirements, filters and monitoring; AI guidance in education. ([Plan technology for your school](#))
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line ([Teaching online safety in schools July, 2019](#));
- Inspiring safe and responsible use and behaviour;
- Acceptable and safe use of mobile phones both within school and on school trips/outings;
- Safe use of camera equipment, including camera phones; and
- What steps to take if you have concerns and where to go for further help

All staff must agree to the Acceptable use of ICT Policy in conjunction with our Code of Conduct in relation to personal online behaviour.

The school's online safety policy outlines the appropriate filtering and monitoring which take places on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation filtering and monitoring.

School staff can access resources, information and support as set out in Annex B of KCSiE.

## Procedures

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns on the school's safeguarding management system CPOMS or on a school recording form for safeguarding concerns (for those who do not have access to CPOMS – e.g. volunteers, cleaning staff) and pass it to the DSL or DDSL without delay.

### **What to do if you are concerned.**

If a child makes an allegation or disclosure of abuse against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth;
- Only ask questions when necessary to clarify, do not investigate or ask leading questions;
- Reassure the child, but don't make promises which it might not be possible to keep;
- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;

- Make a written record, which should be signed and include the time, date and your position in school;
- Do not include your opinion without stating it is your opinion;
- Pass the information to the DSL or alternate without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a child in need. If the DSL is unsure whether the threshold has been met, they will contact the MASH Golden Number for advice (0208 901 2690). Where appropriate, the DSL will complete and submit the MASH referral form [MASH-referral-2022.docx \(live.com\)](#)<sup>12</sup>. The DSL will record all discussions with social workers on CPOMS.

Where the DSL believes that a child or young person may be at imminent and significant risk of harm they should call The Golden Number immediately and then complete the MASH Referral.

Where a safeguarding concern does not meet the threshold for completion of a MASH Referral, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help including the school's local early help offer.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with HSCB procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each pupil.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education

## **Child on child sexual violence and sexual harassment -**

At Hujjat Primary School, we recognise that sexual violence and sexual harassment can occur between children of **any age and sex**.

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

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

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<sup>12</sup> N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police, although the DSL should also be made aware.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 (See appendix 2 for definitions of offences)

Consent can be withdrawn at any time and each time activity occurs. A child under the age of 13 can never give consent to any sexual activity, the age of consent is 16, sexual intercourse without consent is rape.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include: sexual comments, sexual jokes or taunting, physical behaviour, displaying pictures or drawings of a sexual nature, upskirting and online sexual harassment. The school will never consider such behaviour to be "banter" or a part of growing up.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The umbrella term is 'harmful sexual behaviour' (HSB) and it can occur online and/or face-to-face. The school will always consider HSB in a child protection context.

In response to such a report our school will act in accordance with Part 5 of KCSIE (2022):

- reassure the victim that they will be taken seriously, and they will be supported;
- not promise confidentiality as it is very likely that the concern will need to be shared further
- respond in line with our safeguarding procedures outlined in section 5 of this document which have been shared with all staff and students;
- where a concern includes an online element, follow DfE guidance: [Searching, screening and confiscation at school](#) and UKCCIS advice [Sexting in schools and colleges](#). Adults should not view sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery. See [Guidance on Suspected Indecent Imagery for Staff](#).
- if possible, manage any such reports with two members of staff present (preferably the DSL being one of them).

Where there has been a report of sexual violence, our DSL will make and record an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the DSL will consider the need for a risk assessment on a case-by-case basis.

The risk and needs assessment will consider and keep under review:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them

Our DSL will engage with children's social care, the police and specialist services as required. Any risk assessments undertaken by the other agencies/services will be used to inform our school's own risk assessment.

Important considerations:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages and developmental stages of the children involved;
- any power imbalance between the children e.g. age differential, disability or learning difficulty
- if the alleged incident is a one-off or a sustained pattern of abuse;
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- any ongoing risks to the victim, other children, adult students or staff; and
- other related, contextual issues e.g. in the community/local environment
- if both the alleged perpetrator and victim are still attending the same school/college, how best to keep them at a reasonable distance apart (including on transport).

### **Management of sexual violence/harassment cases -**

Where appropriate, the management of such cases will be agreed in consultation with children's social care and/or the police or other specialist service. There are four possible routes – **all** underpinned by the principle that such behaviour is **never acceptable and will not be tolerated:**

**In all cases, the DSL will seek advice from a duty social worker by calling the MASH “golden number” 02089012690**

**Manage internally** - In some case of sexual harassment, e.g. one-off incidents, it might be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support.

**Early Help** – Providing early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

**Referrals to children's social care** – Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to children's social care, who will determine whether any of the children involved are in need of protection or other services. Referring to children's social care should not delay our school from taking immediate action to protect the victim and other children. However, we will ensure that any such actions do not jeopardise a statutory investigation.

**Reporting to the Police** – Any report to the police will generally be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the matter should be passed on to the police. If the alleged perpetrator is under ten (below the age of criminal responsibility), the principle of reporting to the police remains. The police will take a welfare approach, rather than a criminal justice approach.

The school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents/carers. They should also discuss the best way to protect the victim and their anonymity.

With all routes outlined above, it is vital that all concerns, decisions and reasons for decisions are recorded (written or electronic).

**Bail conditions** – The term ‘Released Under Investigation’ (RUI) will apply where circumstances do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity in or in some cases ensuring compliance with an administrative process.

In all cases, our school will work with children’s social care and the police to manage any implications and to safeguard children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

**The end of the criminal process** – if a child is convicted or cautioned for a sexual offence and remains in school, expectations regarding their future behaviour and any restrictions must be made clear.

**Unsubstantiated, unfounded, false or malicious reports** – if a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children’s social care may be appropriate. The school should also consider whether any disciplinary action is appropriate against the individual who made it as per their behaviour policy.

**Safeguarding and supporting the victim** – Support for the victim will be tailored on a case –by-case basis. victims may not disclose the whole picture immediately. They should be asked if they would find it helpful to have a designated trusted adult to talk to about their needs and have choice about who this is. In response to any stress they may experience, flexible or alternative arrangements for their education may need to be considered. We will do everything we reasonably can to protect the victim from bullying and harassment to ensure that they continue to receive a suitable education.

**Safeguarding and supporting the alleged perpetrator** – Any child will likely experience stress as a result of being subject of allegations and any associated negative reactions by their peers. We will respond proportionately, recognising that the alleged perpetrator may have unmet needs as well as potentially posing a risk of harm to other children. These behaviours may be a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice as appropriate from children’s social care, specialist sexual violence services and the police and support will be considered on a case-by-case basis. We will do everything we reasonably can to protect the perpetrator from bullying and harassment to ensure that they continue to receive a suitable education.

If the victim or alleged perpetrator moves to another educational provision, our DSL will ensure that relevant staff at the new provision are made aware of any ongoing support needs and any potential risks to other children and the staff.

## Information sharing, record keeping and confidentiality

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff will have regard to the Government guidance: [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Well-kept records are essential to good child protection practice. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or alternate DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so.

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils) or promise a child to keep a secret which might compromise the child's safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetrated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm tests is met.

Ordinarily, the school will always undertake to share its intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot reasonably be expected that a practitioner gains consent; and, if to gain consent would put a child at risk. If in doubt, staff will consult with the MASH Professional Consultation Line on this point.

The school will have regard to the HSCB Guidance on the Transfer of a Child Protection /or Safeguarding File to another Education Setting. Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

## Managing allegations made against teachers, including supply teachers, other staff, volunteers and contractors

The school will follow the SSP [Arrangements for Managing Allegations of Abuse Against People Who Work With Children or Those Who Are in A Position of Trust](#) if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he/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.

This applies to any child the member of staff, supply teacher, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

Concerns that do not meet the harm threshold will be dealt with in accordance with the school's policy for managing low-level concerns (see Appendix D for low-level concerns procedures).

If any member of staff has concerns that a colleague, supply teacher, volunteer or contractor might pose a risk to children, it is their duty to report these to the headteacher. Where the concerns or allegations are about the headteacher, these should be referred to the Chair of Governors.

The headteacher/Chair of Governors should report the concern to the Local Authority Designated Officer (LADO) within one working day. The referral should be made via MASH using the MASH referral form.

## Use of school premises for non-school activities

The board of trustees will ensure that where school facilities/premises are hired or rented out to organisations or individuals, sports associations or service providers to run community or extra-curricular activities appropriate arrangements are in place to keep children safe.

The board of trustees will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the school facilities or premises to liaise with the school on these matters where appropriate.

These arrangements will apply regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Where a lease or hire agreement is entered into the board of trustees will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement. The guidance on [keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

## Whistleblowing

The board of trustees recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example, pupils in the school or members of the public.

The board of trustees would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within school, including the whistleblowing procedures adopted by the board of trustees where necessary. However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Useful contacts:

<b>Harrow Children's Social Care &amp; Multi-agency Safeguarding Hub (MASH)</b>	<b>'Golden Number': 020 8901 2690</b> Emergency Duty Team: weekends, bank holidays and between 5pm-9am during the week: <b>020 8424 0999</b>
<b>Police</b>	<b>101 or for emergency: 999</b>
<b>FGM - Mandatory reporting</b>	<b>Police on 101</b>
<b>Local Authority Designated Officer for Allegations against staff (LADO)</b>	Initial referrals via <b>MASH/Golden Number</b> above.
<b>Children and Young People with Disabilities 0-25 years</b>	<b>020 8966 6481</b>
<b>Local multi-agency procedures, guidance and Training: Harrow Strategic Safeguarding Partnership</b>	<a href="http://www.harrowscb.co.uk/">www.harrowscb.co.uk/</a>
<b>NSPCC</b>	<b>0800 800 5000</b>
<b>Report Abuse in Education NSPCC Helpline</b>	<b>0800 136 663</b>
<b>Childline</b>	<b>0800 1111</b>
<b>Government's Whistle-blowing Service via NSPCC Report Line</b>	<b>0800 028 0285</b>
<b>Forced Marriage Unit</b>	<b>Tel: 020 7008 0151</b>  From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm)
	Out of hours: 020 7008 1500 (ask for Global Response Centre)  Email: <a href="mailto:fmufco.gov.uk">fmufco.gov.uk</a>

<b>Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)</b>	<b>Tel: 020 7340 7264</b> Email: <a href="mailto:counterextremism@education.gsi.gov.uk">counterextremism@education.gsi.gov.uk</a>
<b>Disclosure and Barring Service</b>	<b>Tel: 03000 200 190</b> Email: <a href="mailto:customerservices@dbs.gov.uk">customerservices@dbs.gov.uk</a>
<b>Teaching Regulation Authority</b>	<b>Tel: 020 7593 5392</b> Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>

## Appendix A

Guidance of how to record concerns on school's safeguarding management system (CPOMS).

### Adding an Incident

There are several different ways to add a new incident with full access.

If you are logging into CPOMS to add an incident, you will need to find the name of the student following any of the methods explained earlier. Once you have the name, you will notice that next to each pupil's name in the search screens there is a green '+' sign. You can click this to take you straight to the add incident form.



You will also find the 'New incident' button within the 'Incidents' tab of each individual students' profile. You get to here by clicking on the student's name following the search and selecting the second 'Incidents' tab at the top. The 'New Incident' button is at the top right hand side.



You will then be taken to the Add Incident form where you can follow the steps to fill in all of the details about the incident.

- Fill in the incident text box with all of the details about the incident which you are adding. This is a free text box so you can add as much or as little as needed. Be careful to be accurate and specific. N.B When inputting any linked student names into the incident text box, please ensure that you spell their name identically to how it is spelt within your MIS. This ensures that if you do need to use the 'Hide Names' feature in the future, their name will be detected and blanked out. If the student is not linked in to the incident, we recommend using their initials as they will not automatically be picked up by the 'Hide Names' feature.
- After you have filled in all of the details of the incident you need to select at least one category to assign it to – if there is an overlap you can select more than one.
- You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all pupils selected. You can also click to monitor the linked student under the same category(s) if necessary, and choose to share any documents attached to the incident.
- The 'Body map' feature allows you to apply numbered markers to a body map image to support your incident text.

Following this you can select a time and date. These will both default to the current time and date you are adding the incident, however if you wish to change it to when the incident actually occurred you can do so here.

- Next, you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members. Alternatively you can select to alert an entire alert group by choosing the relevant alert group button(s) (beneath the individual alert option).
- If you would like to attach a document to support the incident e.g. a social services letter, previous school case notes, or meeting minutes etc. you can do so at this point. Simply click to browse and find the relevant document on your machine and add as you would an email attachment, or drag a file from one of your folders to upload.
- Next, you can add any agency names to the incident to make others aware of which agencies are involved with this pupil. This list was compiled by the school during the implementation stages. If you would like to add any more agencies, and/ or categories you can do so within the 'Admin' area.

- Lastly, you can choose to add the incident to your planner. This is useful if you wish to follow something up, or want to have a month by month view of the incident's progression.

Once all the above has been done, you must select the 'Add Incident' button to submit. This will then send out email alerts to all of the selected staff members telling them that they need to log in to CPOMS to look at a newly added incident.

## Appendix B

### Record of concern about a child/young person's safety and welfare

Part 1 (for use by any staff/adult who does not have access to school's safeguarding management system CPOMS) – must be handwritten and legible.

Pupil's name:		Date of birth:	Class/Form:
Date & time of incident:		Date (of writing):	& time
Name (print): _____ Job title:			
Signature: _____			
Record the following factually: Nature of concern, e.g. disclosure, change in behaviour, demeanour, appearance, injury, witnesses etc. <i>(please include as much detail in this section as possible. Remember – the quality of your information will inform the level of intervention initiated. Attach additional sheets if necessary.)</i>			
What is the pupil's perspective?			
Professional opinion, where relevant <i>(how and why might this have happened?)</i>			
Any other relevant information. Previous concerns etc. <i>(distinguish between fact and opinion)</i>			
Note actions, including names of anyone to whom your information was passed and when			

**Please pass this form to the DSL without delay**

## Record of concern about a child/young person's safety and welfare

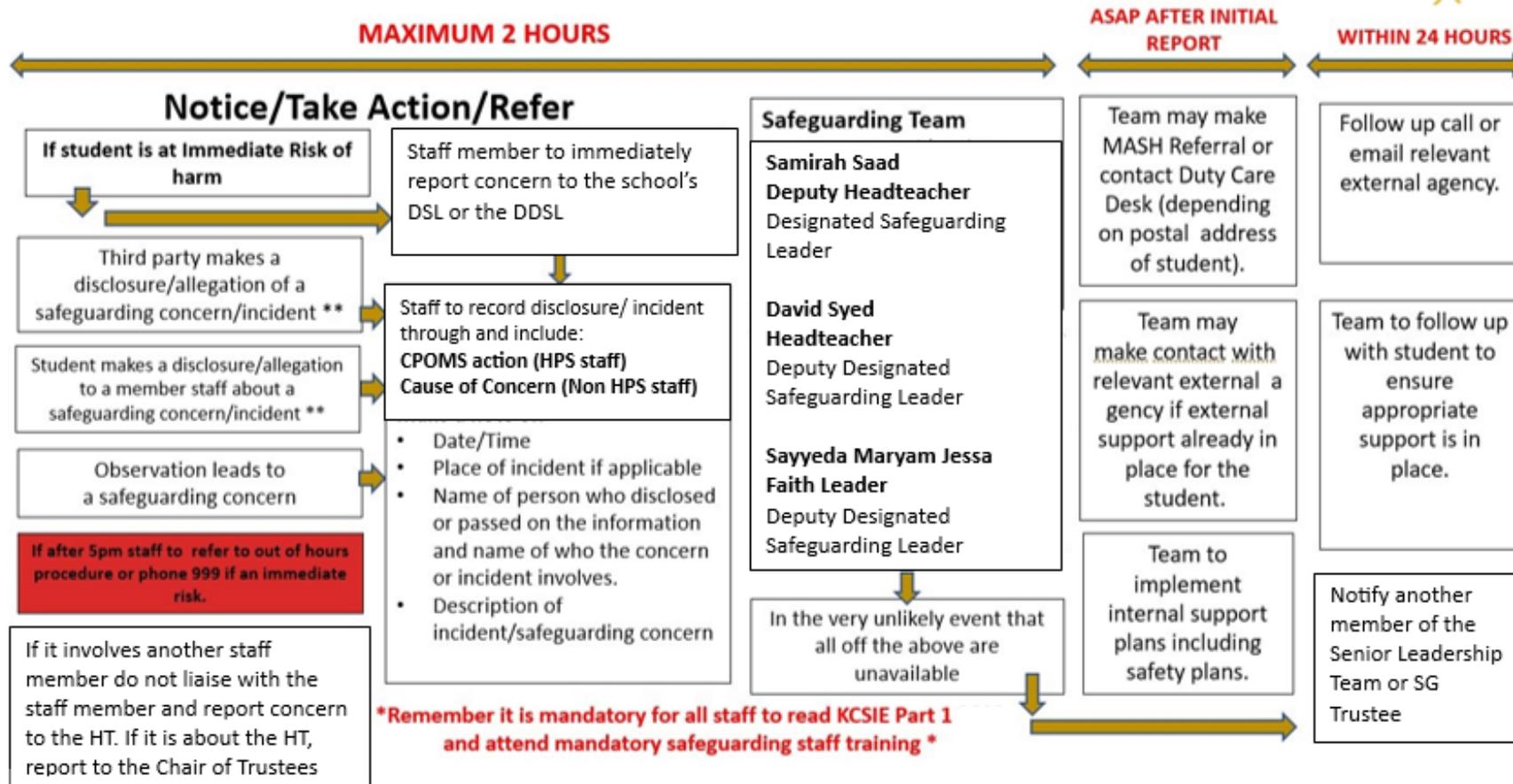
Part 2 (for use by DSL – if CPOMS is not accessible)

Information received by DSL:	Date:	Time completed:	From whom:		
Any advice sought, if applicable	Date:	Time completed:	From: name/organisation:		
	Advice received:				
Action taken with reasons recorded (e.g. MASH Referral completed, monitoring advice given to appropriate staff, CAF etc.)	Date:	Time completed:	By whom:		
Outcome	Date:	Time completed:	By whom:		
Parent/carer informed?	<b>Y</b>	Who spoken to:	Date:	Time:	By whom:
	<b>N</b>	Detail reason:			
Is any additional detail held, if so where?					
Prior safeguarding history	No. of previous records of concern:				
	Has the child been subject of CAF/Early Help assessment?				
	Currently on CP Plan (CPP) / Child in Need Plan (CiN)				
	Previously on CP Plan (CPP) / Child in Need Plan (CiN)				
	Is child known to other agencies?		Y / N		
Name of DSL:			Signature:		

# Appendix C – Actions where there are concerns about a child

Hujjat Primary School

## Safeguarding Action Flowchart



## Appendix D

### Low-level concerns

The school strives to embed a culture of openness and transparency in which the School's values and expected behaviour, as set out in the Code of Conduct for Staff, are constantly reinforced by all staff.

All staff should feel enabled to share any concerns about their own or another member of staff's behaviour, with the appropriate member of staff as set out below.

#### [The distinction between an allegation and a low-level concern](#)

The term 'allegation' (in this context) means that it is alleged that an adult who works with children 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 (this includes behaviour that may have happened outside of School that might make an individual unsuitable to work with children)

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

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

Examples of such behaviour could include, but are not limited to, being over friendly with children, having favourites, taking photographs of children on their personal devices, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language etc.

Staff are not expected to determine whether their concern is a low-level concern, serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination will be made by the Headteacher.

### How to share low-level concern

It is important that low-level concerns are shared with the Headteacher (DDSL) or if the headteacher is not available the DSL as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern and relevant incident(s).

Concerns can be shared verbally in the first instance, or in writing. The context in which the low-level concern arose and details which are chronological, precise and accurate as possible of the concern and relevant incident(s) must be provided.

Where details of the low-level concern is provided verbally, Headteacher (DDSL) or DSL will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. The Headteacher will check the accuracy of the record with the member of staff who raised the concern and this should be signed and dated by the member off raising the concern.

Low-level concerns will be treated in confidence as far as possible, but the school may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

## **Self-reporting**

Staff who find themselves in a situation which could be misinterpreted, might appear compromising to others, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for Staff are encouraged to self-report. Self-reporting can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioral standards and self-awareness of the individual's own actions or how they could be perceived; and is an important means of maintaining a culture where all staff aspire to the highest standards of conduct and behaviour.

## **Recording and reviewing low-level concerns**

All low-level concerns will be recorded in writing by the Headteacher. The record will include details of the context in which the concern arose and the action taken. The name of the member of staff sharing the concern will be noted however, where the member of staff wishes to remain anonymous this will be respected as far as possible.

Records will be reviewed at regular intervals to identify potential patterns of concerning, problematic or inappropriate behaviour.

## **Retention of records**

Records will be kept confidential, held securely and in compliance with the Data Protection Act 2018 and UK GDPR.

When the member of staff leaves and/or takes up new employment the records will be reviewed to ensure it still has value either as a safeguarding measure or because of its possible relevance to future claims and is therefore necessary to retain, or whether it can be securely destroyed.

## **References**

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor performance. Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. Where a low-level concern has met the threshold for referral to the LADO and found to be substantiated will be included in a reference.

## Appendix E – Filtering and monitoring guidance



### Hujjat Primary School

### Monitoring and Filtering Action Flowchart

<b>IT Systems' providers</b>	 <p>HPS staff and pupils have licensed devices from and configured by Joskos and Beebug. Devices have security updates; their security features are enabled and authenticated to access data.</p>	 <p>In the event of a cyber-attack, it is recorded, and serious attacks reported on <a href="#">Action Fraud</a> and ESFA for Academy Trusts.</p>
<b>IT Support</b>	 <p>Technical Support is provided by Joskos and Beebug. This is remotely primarily. On site tech-based jobs are prearranged.</p>	 <p>IT support jobs are logged, so they can be corrected</p>
<b>Devices and Software</b>	 <p>Only school devices are used on site for staff and pupils. These are set up by our IT Support team. The school uses SharePoint for teaching and learning; Google Classroom for home learning, Arbor for administration and CPOMS for safeguarding All information is secure, and separate access is granted for confidential information, including multi-factor authentication</p>	 <p>Personal devices are not allowed to be used, unless by approved external visitors such as: EP, nurse etc.</p>
<b>Computing Curriculum</b>	 <p>The Computing and Curriculum Leaders ensure all teaching resources for computing are seen beforehand. The school uses 'Kapow' to aid with the teaching of computing, and this includes teaching videos and following AI in education guidance</p>	
<b>Monitoring and Filtering</b>	 <p>Lgfl blocker used by all staff, and staff have their own logins whenever online content is used for teaching purposes. Anti malware software protects the cloud based network. Information is shared in accordance with <a href="#">GDPR Regulation</a></p>	 <p>Staff members understand the school devices are not for personal use. Beebug generate a report to identify content/ sites viewed. If inappropriate content is viewed by staff it is <b>reported</b>, <b>recorded</b> and SG team <b>remember</b> to investigate the matter with a 'staff cause of concern report'. GDPR breaches are <b>recorded</b> and <b>reported</b> by the School Business Manager to the Data Protection Officer.</p>
<b>Internet Safety</b>  <b>Pupil Awareness</b>	  <p>Children are explicitly taught about Internet Safety as a prerequisite to a new unit of learning in computing. Internet Safety is also discussed during assemblies and PSHE lessons and reiterated for cross curricular lessons.</p>	 <p>If inappropriate content is accidentally seen by a pupil, they understand they must <b>report</b> it; the staff member must <b>record</b> it and we <b>remember</b> this process.</p>
<b>Staff Training</b>	<p>Staff are kept up to date on KCSIE and updates. This includes monitoring and filtering procedures.</p>	
DSL DDSL Computing Leader School Business Manager Data Protection Officer	Samirah Saad David Syed and Sayyeda Maryam Jessa Haniya Rizvi (2025-2026) Julie Day Nicola Cooke	