The Complete Works Policies

Child Protection and Safeguarding Policy and Procedures

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Reviewed by: Amy Jones - Director of Operations - August 2026

Ratified by: Dean Phillips-Smith - Headteacher East School & Andy Davies - Headteacher South School

Date of next review: August 2027

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1. TCW's 6 Core Safeguarding Principles

1. The welfare of the child is **paramount** and underpins all discussions, decision making, and actions taken at TCW.
2. All concerns disclosed and reported will be **taken seriously**.
3. All children have the right to have a life free from harm, regardless of age, gender, ability, culture, race, language, religion or sexual identity, all have **equal rights to protection**. This includes children's lives in digital and online environments.
4. The **child's wishes and feelings** will be taken into account where appropriate to determine what action to take and what support to provide.
5. All staff including supply staff, contractors and volunteers have an **equal responsibility to act immediately** on any suspicion or disclosure that may suggest a child is at risk of harm or has been harmed.
6. The Designated Safeguarding Lead will ensure that all students and staff involved in safeguarding and child protection issues will receive **appropriate support**.

These 6 core principles are embedded within our safeguarding arrangements, policies, procedures and systems, and underpin TCW's approach to safeguarding.

2. Purpose of TCW's Safeguarding Policy

- To ensure all students on roll at TCW are effectively safeguarded.
- To provide all staff with key information to enable them to identify safeguarding concerns and know what action to take in response.
- To ensure consistent good practice throughout TCW.
  To demonstrate our commitment to safeguarding the whole school community: students, parents/carers and other partners.

3. Policy Links

This policy can be accessed by all on the school website.

Staff can also find this policy on Ariel under the 'My Policies' section. All staff are required to sign off that they have read this policy on Ariel. Safeguarding Procedure summaries are also included in the Staff Handbook.

This policy supports/complements the following policies and guidance:

- Anti- Bullying/ Cyber-Bullying
- Attendance
- Behaviour and Conduct
- British Values
- Compliments, Comments and Complaints
- Data Protection (inc privacy notices)
- Drugs Policy
- E-Safety, Devices, Social Media
- Equality and Diversity
- First aid and Medication
- Health & Safety
- Visitors' Procedures (in H&S Policy)
- Lone Worker
- PSHE
- Health & Safety Policy, inc Risk Assessments
- Safer Recruitment
- Special Educational Needs & Disability
- Spiritual, Moral and Social Education
- Safeguarding Information for Parents and Carers
- Safeguarding Information for Students
- Whistleblowing

4. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education and the Academy Trust Governance Guide. We comply with this guidance and the procedures set out by the safeguarding children partnerships in the areas where our students live.

The policy is also based on the following legislation and guidance:

- Keeping Children Safe in Education 2026 (KCSIE) – statutory guidance for schools and colleges on safeguarding and promoting the welfare of children.
- Working Together to Safeguard Children 2026 – statutory guidance on multi-agency working to help, support and protect children.
- Working Together to Improve School Attendance – statutory guidance on attendance and the safeguarding implications of absence.
- Education Act 2002, including the duty on schools to safeguard and promote the welfare of children.
- Education (Independent School Standards) Regulations 2014, particularly Part 3 relating to welfare, health and safety and safeguarding.
- Children Act 1989, including sections 17 and 47.
- Children Act 2004, including duties relating to safeguarding and promoting the welfare of children.
- Children and Social Work Act 2017.
- Equality Act 2010 and the Public Sector Equality Duty, where applicable.
- Human Rights Act 1998.
- Safeguarding Vulnerable Groups Act 2006.
- Counter-Terrorism and Security Act 2015, including the Prevent duty.
- Modern Slavery Act 2015.
- Domestic Abuse Act 2021.
- Sexual Offences Act 2003, including provisions relating to abuse of a position of trust.
- Female Genital Mutilation Act 2003.
- Children and Families Act 2014, including provisions relating to children and young people with special educational needs and disabilities.
- Information sharing legislation and statutory guidance, including the information-sharing requirements applicable from September 2026.
- Relevant local safeguarding partnership procedures, threshold documents and protocols.
- Relevant local authority procedures relating to Children Missing Education, children absent from education, attendance, exclusions and alternative provision.
- Human Rights Act 1998
    - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
    - Article 8: the right to respect for private and family life (a qualified right), this includes a duty to protect individuals' physical and psychological integrity.
    - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination.
    - Protocol 1, Article 2: protects the right to education.
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- The Equality Act 2010 [please also refer to our Equality & Diversity Policy]
- The Equality Act 2010 And Schools: Department Advice For School Leaders, School Staff, Governing Bodies And Local Authorities (May 2014)
- What To Do If You're Worried A Child Is Being Abused (DfE March 2015)
- UKCIS Sharing Nudes And Semi-Nudes: Advice For Education Settings Working With Children And Young People (December 2020)

- Child Sexual Exploitation: Definition And A Guide For Practitioners, Local Leaders And Decision Makers Working To Protect Children From Child Sexual Exploitation (Feb 2017)
- Sexual Violence And Sexual Harassment Between Children In Schools And Colleges: Advice For Schools And Colleges On How To Prevent And Respond To Reports Of Sexual Violence And Harassment Between Children (Updated July 2021)
- When To Call Police: Guidance For Schools And Colleges
- Mobile phones in schools 2026
- The Apprenticeships, Skills, Children And Learning Act 2009
- Modern Slavery: Statutory Guidance for England and Wales (May 2026)
- Information Sharing Duty Statutory guidance for safeguarding organisations (Sept 2026)
- Children's Wellbeing and Schools Act 2026

TCW has regard to relevant statutory guidance and will update its safeguarding arrangements when legislation, statutory guidance or local safeguarding procedures are amended. This policy will then be updated on our MIS Ariel, and shared with staff in the most recent Bulletin sent via email. Depending on the nature of the update, the Head of Safeguarding and Wellbeing will determine whether staff training is required.

As an independent school, TCW recognises that its safeguarding arrangements must be appropriate to the school's circumstances, provision and cohort. This includes the particular safeguarding needs of children receiving alternative provision, 1:1 education, off-site education, remote education or blended provision.

4.1 Safeguarding Children Partnership guidance

The Children Act 2004 as amended by the Children and Social Work Act 2017 has brought about the establishment of Local Authority Safeguarding Children Partnerships. These partnerships coordinate the work of all agencies and ensure that this work is effective in achieving the best outcomes for the children living in their boroughs.

The three statutory safeguarding partners (Local Authority, Clinical Commissioning Group and Chief Officer of Police) have published arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

In accordance with Working Together to Safeguard Children 2026, schools are a protective factor for children, especially the most vulnerable, and have a pivotal role to play in local multi-agency safeguarding arrangements. TCW's contribution, insight and co-operation are vital to the successful delivery of these arrangements. Schools are named as a 'relevant agency' and as such, are under a statutory duty to cooperate with local safeguarding children partnership multi-agency arrangements. This includes responding to safeguarding audits of quality and compliance, as requested by the local authority and/or local safeguarding partners.

As TCW has its Central office based in Tower Hamlets, we have referenced this borough's guidance for the structure of this policy. However, as TCW works with Students from all over London, in practice TCW will use the appropriate guidance from each local authority that it has Students resident in (or are responsible for), including around the following areas:

- Child Protection procedures guidance for education settings
- Levels of Need and safeguarding threshold documentation
- Multi-agency escalation and resolution policies
- Any other supplementary guidance available

For Staff allegations, TCW will refer to the Local Authority Designated Officer in the local authority of the school the staff member is based. TCW will refer to that local authority's:

- LADO procedures and flowcharts for allegations made against Staff

TCW's Safeguarding Team will engage with the boroughs' Designated Safeguarding Lead Forums, cooperate with all processes as needed (including Safeguarding Audits, Rapid Reviews and Child Safeguarding Practice Reviews) and attend local training. More information regarding the partnerships can be found below:

City and Hackney Safeguarding Children Partnership
Haringey Safeguarding Children Partnership
Islington Safeguarding Children Partnership
Lewisham Safeguarding Children Partnership
Southwark Safeguarding Children Partnership
Tower Hamlets Safeguarding Children Partnership

5. Definitions

Safeguarding and **promoting the welfare of children** is:

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

Child protection refers to the processes followed to protect children who have been identified as suffering or being at risk of suffering significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

Parent/Carer refers to birth parents and other adults who are in a parenting role, for example step-parents, carers, foster carers, and adoptive parents.

Child/Children includes everyone under the age of 18. The use of the term Young Person refers to a child.

Student includes any child (under 18 years old) or adult (18 years old or over) contracted or on roll at one of TCW's schools.

Staff refers to all those who work for, or on behalf of, TCW, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

6. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility.

This policy applies to all staff and Trustees at TCW and is consistent with the procedures of the various Safeguarding Children's Partnerships that we work with. We very rarely have volunteers, but the policy also outlines the procedures followed if or when we do. Our policy and procedures apply to education within our onsite provisions and off-site education within homes, libraries and other suitable locations.

6.1. All staff (including all TCW employees, inductees and trainees)

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

- All staff are expected to keep safeguarding values at the core of their daily conduct. The best interests of the child should determine their responses and decision making, behaviour and the actions taken.
- All staff have a professional responsibility to act on safeguarding concerns. Staff must not assume that someone else will take action or that the Designated Safeguarding Lead already knows about a concern.
- All staff are aware it is a criminal offence for adults working in a school (ie. in a position of trust) to engage in any sexual activity with students, including students up to the age of 18.
- All staff should recognise that as frontline workers they are in a very important position to identify concerns early, provide help and support to children, promote children's welfare, and prevent concerns from escalating.
- All staff must report safeguarding concerns immediately and without unnecessary delay. Staff must not wait until the end of the school day, wait for further evidence, or attempt to investigate a concern themselves before reporting it**. We would expect to be informed of concerns within 2 hours of the event. All concerns must be written up and added to MyConcern before the end of that same working day.**
- Staff can call the DSL for advice, or add their concerns straight to MyConcern directly. If the concern requires immediate action, staff should call the DSL to highlight the situation, as we are usually working on multiple concerns simultaneously. We are also available to offer on-the-spot support and advice.
- If staff do not feel confident with any aspect of safeguarding, they should approach the DSL for advice, further guidance, or possible training options. We welcome proactive requests for help.
- If in doubt about any safeguarding matter, staff should **always** speak to the DSL. Please refrain from seeking advice from colleagues in regards to safeguarding thresholds as they may also feel uncertain or not have the full picture around a student's safeguarding situation.
- If the DSL is unavailable, calls will automatically be referred to the other DSL, DDSL, or a Deputy Head or Head Teacher.

All TCW staff (including those with no direct Student contact) will read and confirm that they understand:

- Part 1 in full of the Department for Education's statutory safeguarding guidance, **Keeping Children Safe in Education**, and review this guidance at least annually.
- TCW's systems which support safeguarding, including MyConcern and staff policies (e.g. Staff Code Of Conduct, Teacher Handbook, Behaviour Policy, E-Safety Policy etc), safeguarding team roles, and the safeguarding response to young people who go missing from education.
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as Child-On-Child Abuse, Modern Slavery, Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM) and Radicalisation.
- Mental health problems sometimes being an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality.
- The Family Help, Universal or Community-based Services process and their role in it, including identifying emerging problems, liaising with the DSL, and where required sharing information with other professionals to support early identification and assessment.
- The process for making referrals to children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play - however at TCW only the Safeguarding Team are expected to submit referrals externally and liaise with any relevant professionals.

Regular training and updates from the internal safeguarding team or external experts will help ensure staff are kept informed and up-to-date on safeguarding.

As a school, we have a pivotal role to play in multi-agency safeguarding arrangements and will work with the safeguarding partnerships to safeguard and promote the welfare of children which may include identifying and responding to their needs. The three safeguarding partners within each borough are a safeguarding partnership (Local Authority based Social Care), a Clinical Commissioning Group (Health) and chief officer of Police within the borough.

6.2. Designated Safeguarding Leads (DSLs)

Our DSLs are

East School: Lotta Jones 020 7377 0280 ext 606, lotta.jones@tcw.org.uk

South School: Deke Ringrose 020 7377 0280 ext 620, deke.ringrose@tcw.org.uk

The Designated Safeguarding Leads take lead responsibility for safeguarding arrangements within respective TCW schools on a day-to-day basis. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

If the concern involves a risk to life, a serious injury, or a crime is occurring please call the emergency services on 999. After this, the DSL should be called and updated immediately, or as soon as safely possible. If the emergency is related to a home-situation, Staff should consult with the DSL before allowing a student to go home.

If you become aware of a safeguarding concern outside of school hours please contact the emergency services if the concern is urgent or high risk, or add to MyConcern so that this can be reviewed by DSLs at the earliest opportunity.

The full responsibilities of the DSL are set out in their job description, although the DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of Students and young people, or Staff performance in safeguarding matters against safeguarding policy and procedures.
- Manage, assess, allocate and action incoming safeguarding information (e.g. phone calls, meetings, reports and recording on MyConcern) and ensure TCW is safeguarding effectively and has accurate records of this and the subsequent actions taken.
- Understand and manage online filtering and monitoring processes and assess any concerns or notifications from Lightspeed about Student or Staff online usage. Also support IT or other departments with reviews and checks to ensure filtering and monitoring is functioning correctly across the organisation.
- Work closely with SEN Leads, Special Educational Needs and Disabilities Information and Support Services (SENDIASS), SENCOs and other specialist roles to ensure Special Educational Needs of Students are understood and appropriately accounted for in safeguarding situations.
- Refer suspected cases, as appropriate, to the relevant body (Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), be familiar with local universal, community-based services and early help offers, and support any other staff who have been tasked with such referrals.

- Help promote educational outcomes by sharing information where appropriate about the welfare, safeguarding and child protection issues that students (including those with a social worker) are experiencing.
- Support teaching teams to identify the challenges that these students may face and the additional academic support and adjustments that they could make to best support them.
- Keep SLT and the Headteacher informed of any issues, and liaise internally or externally with safeguarding partners, case managers and designated officers for child protection concerns as appropriate.

Only in exceptional circumstances would staff who are not part of the Safeguarding Team (i.e. DSLs, DDSLs, Head of Safeguarding & Wellbeing) be expected to make a referral to Social Care. However, if they needed to do so, due to emergency or other circumstances, they should use the number/s below for the borough where the young person lives. They will be able to discuss their concern with a social worker. Alternatively they can seek (non-urgent) external advice from the NSPCC professionals helpline.

City of London and Hackney 020 8356 5500 / out-of-hours 020 8356 2710

Haringey 020 8489 4470 / out-of-hours 020 8489 0000

Islington 020 7527 74 00 / out-of-hours 020 7226 0992

Lewisham 020 8314 6660 / out-of-hours 020 8314 6000

Southwark 020 7525 1921 / out-of-hours 020 7525 5000

Tower Hamlets 020 7364 5601 (or 5606) / out-of-hours 020 7364 4079

Any such referrals or contact should be reported to the DSL as soon as possible.

6.3. Deputy Designated Safeguarding Lead (DDSL) and DSL cover

When a DSL is absent, the Deputy Designated Safeguarding Lead (DDSL) will assume full responsibility for the DSL role. Where schools do not have a specific DDSL role, the DDSL is the Deputy Head Teacher.

East School DDSL: Kiera Leaper / 02073770280 Ext 821/ kiera.leaper@tcw.org.uk

South School Deputy Head: Rahsaan McClymont / 02073770280 Ext 719 / rahsaan.mcclymont@tcw.org.uk

Head Teachers are also DSL trained and will provide DDSL support if other suitably trained staff are unavailable:

East School: Dean Phillips Smith / 02073770280 Ext 604 / dean.phillips-smith@tcw.org.uk

South School: Andy Davies / 02073770280 Ext. 634 / andy.davies@tcw.org.uk

The Head of Safeguarding & Wellbeing is a trained and experienced DSL and can provide support, advice or cover the DSL role if needed.

Ross Adams / 020 7377 0280 ext 667 / ross.adams@tcw.org.uk

6.4. Trustees

The Trustees have the strategic leadership responsibility for safeguarding arrangements at TCW. As a collective body they must have regard to all relevant statutory guidance issued, including Keeping Children Safe in Education, and ensure that our safeguarding policies and procedures, including the

current Child Protection Policy, are compliant with legislation and statutory guidance, reflect local safeguarding arrangements and are effective.

Trustees will ensure that:

- This policy is reviewed regularly and updated when relevant legislation or statutory guidance changes
- TCW has appropriate safeguarding systems, procedures and resources
- The Safeguarding team have sufficient time, funding, training and resources to undertake their responsibilities effectively
- Safeguarding training and safeguarding updates are provided to staff as required and at least annually
- Safeguarding concerns, allegations against staff, low-level concerns, attendance concerns and other relevant safeguarding information are appropriately monitored at a strategic level
- Safeguarding practice is reviewed following significant incidents, safeguarding reviews, complaints or identified areas of concern
- Appropriate action is taken where safeguarding audits, reviews or incidents identify areas requiring improvement.

Trustees will seek assurance not only that safeguarding policies are in place, but that they are understood and implemented effectively in practice.

Reji Vettasseri is the Chair of Trustees.

Camilla Saunders is the Trustee with designated responsibility for safeguarding oversight at TCW. She provides governance-level scrutiny and challenge in relation to safeguarding and supports the Board of Trustees in fulfilling its safeguarding responsibilities. She will act as the 'case manager' in the event that an allegation of abuse is made against the Executive Headteacher or CEO (see Appendix 3).

The Trustees can be contacted by emailing chair.trustees@tcw.org.uk.

6.5. Headteacher

The Headteacher of each TCW school is responsible for:

- Ensuring that the TCW Safeguarding and Child Protection Policy, as well as other safeguarding policies, are communicated to all staff, understood by all members of staff, and followed by all members of staff.
- Communicating this policy to parents/carers when their child joins the school via the TCW website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent or unavailable for extended periods of the day.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer (see Appendix 3).

East Head Teacher: Dean Phillips Smith / 02073770280 Ext 604 / dean.phillips-smith@tcw.org.uk
South Head Teacher: Andy Davies / 02073770280 Ext. 634 / andy.davies@tcw.org.uk

6.6. Dual Registered Main Institutions

The safeguarding responsibility for dual roll students falls to the main school. When working with dual roll students, TCW is usually the subsidiary school, therefore TCW are responsible for providing safeguarding information to the DSL at the main institution to enable them to follow their own institution's safeguarding policies and procedures. However, TCW will not let this arrangement delay or confuse the overriding need to safeguard its students appropriately.

6.7. Professional Visitors

Please refer to TCW's Visitor Policy.

When a Social Worker, Police Officer or any other professional visits TCW to meet with a student as part of statutory investigations or any other work, the ultimate safeguarding responsibility still remains with TCW.

TCW is aware of the need for the student to have an appropriate adult when interviewed by the Police in accordance with the PACE Code C statutory guidance.

7. Equality statement - Children who may potentially be at more risk of harm

All staff should recognise that all children are vulnerable, but that some children may be more vulnerable than others, and therefore at more risk of harm. As an independent alternative provision, TCW has a great many students to whom this applies.

Please refer to TCW's Equality & Diversity Policy.

Staff need to be aware that other children who may be potentially more at risk of harm include a child who:

- is on roll with an Alternative Provision school (such as TCW) or has experienced multiple suspensions, has been permanently excluded (or at risk of) from schools and/or colleges, or has previously attended a Pupil Referral Unit.
- is persistently absent from education, including persistent absences for part of the school day
- has (or has had) a Social Worker, or is a Looked After Child, or Care Leaver - meaning they are more likely to have suffered abuse at some point in their childhood and may be more vulnerable to further abuse, including exploitation.
- has returned home to their family from care, or are placed back in the family home as part of their LAC order
- is a privately fostered child
- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is LGBTQ+ or gender-questioning, as these students can be targeted for abuse by others
- is from an ethnically diverse group due to the risk of adultification whereby their vulnerability as a child is reduced or set aside because of racial bias and stereotypes impacting professional judgement.
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- is showing signs of being drawn in to antisocial 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 so-called honour based abuse such as Female Genital Mutilation or Forced Marriage
- is at risk of modern slavery, trafficking or criminal or sexual exploitation
- is at risk of being radicalised into terrorism or exploited
- has a parent/carer in custody, or is affected by parental offending

- has experienced discrimination due to their race, ethnicity, religion, gender identification or sexuality. TCW understands that a person's sexuality, gender identity or being trans is not a safeguarding issue and we have a commitment to not 'outing' LGBTQ+ members of the school community without their permission, unless there are specific safeguarding reasons for doing so
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, living in temporary accommodation, adult mental health issues or domestic abuse
- is misusing drugs or alcohol themselves
-

Staff must be more vigilant in their day-to-day work with children when the above vulnerabilities are known, and report all concerns immediately to the Designated Safeguarding Lead.

7.1. Children in need of Early Help (including Universal or Community-based Services or Family Help)

All staff are prepared to identify children who may benefit from Early Help, which is providing support as soon as a problem emerges at any point in a child's life. TCW recognises the important role schools have in identifying children and families who are at risk of poor outcomes without early intervention. All staff need to recognise that all children may benefit from Early Help at any point in their childhood, but some children may benefit from Early Help more than others. These are often children with known vulnerabilities, which are listed above.

All Early Help referrals (e.g. to Family Help, universal services, or community-based services) are managed by the DSL, please contact them if you feel any referral or support would be appropriate - we can refer internally for a range of support and assistance (e.g. counselling sessions, PSHE interventions, additional targeted lessons) or externally for local services and resources, dependent on the child or families' needs. If a students' outcomes are not improved by accessing Early Help, a referral to Family Help, Social Care or another suitable service will be made by the DSL, as appropriate.

Different boroughs will have different thresholds, contact points and processes for Family Help. The DSL will navigate these to ensure the appropriate referral is made.

All referrals should be completed with consent and collaboration with the family concerned to ensure accuracy, engagement and support is achieved. The DSL should always be aware of all referrals, and record these.

7.2. Children in need of a Social Worker

Children who have been allocated a social worker may have experienced abuse including neglect and belong to a family that has many complex circumstances. Staff should recognise that these children will have experienced adversity and trauma that can leave them vulnerable to further harm, as well as educationally disadvantaged, and have a negative impact on their attendance, learning, behaviour and mental health.

When making decisions about safeguarding, carrying out risk analysis, making a safeguarding response to concerns such as unauthorised and persistent absence, and providing pastoral and academic support, we will take seriously the fact that the child in need of a social worker will require enhanced pastoral and academic support alongside that provided by statutory services. TCW is also committed to providing further pastoral and academic support to children who have had historic contact with a Social Worker, in recognition that the abuse and trauma is likely to have an impact on the child beyond the duration of the involvement of statutory services.

TCW will cooperate with the Virtual Schools in all of our boroughs, which now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children known to a social worker.

Contact with other professionals, such as Social Workers, will be done by DSLs, TCW office staff or Onsite Managers. Only in exceptional circumstances (such as an urgent Social Care or Police referral) would a Teacher be required to have contact with external professionals. This is to ensure clarity of roles and responsibilities, and help the Teaching staff to maintain positive and focussed relationships with the student and their family whilst fulfilling their safeguarding duties.

7.3. Children requiring mental health support

All staff have an important role in supporting the mental wellbeing of children and identifying behaviour that may suggest a child is experiencing mental health problems. All staff need to recognise that mental health may be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff should be aware of the trauma and mental health impact on a child who has had adverse childhood experiences including abuse, bereavement and separation of parents/carers. Staff should also be aware that the Covid-19 pandemic has had a negative impact on the mental health of many children, some of whom have never previously experienced difficulties with their mental health. However, all staff should be clear that whilst they are well placed to observe Student changes or day-to-day behaviours that may indicate mental health or safeguarding issues (e.g. suicidal ideation), only appropriately trained professionals should attempt to make a diagnosis of a mental health difficulty.

Changes in behaviour or warning signs that Staff should be alert to include ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually like, and physical signs of self-harm or neglecting themselves. However, not every child who exhibits these behaviours is suicidal, or has a mental health concern, although spotting these signs should prompt safe and effective interventions or more detailed checks or monitoring.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow this policy and procedures, speaking to the DSL or DDSL. If staff feel that a child is in severe and immediate, life-threatening danger, they should call 999 and then the DSL for support.

All staff and students are informed about their access to TCW's Counsellor (a registered member of the British Association for Counselling and Psychotherapy). Students and staff can self-refer for support or counselling by contacting the Counsellor directly:

Stuart Davenport / 020 7377 0280 ext 625 / stuart.davenport@tcw.org.uk

Whilst anyone can refer a student for support or counselling by contacting the Counsellor directly (who will then contact the student), it is important to note that this offer of support is always optional for the student. TCW will also refer to local external services or specialist agencies for mental health support wherever this is required, or best suited to the particular needs of a student.

Other staff involved around supporting mental health are:

East School DSL: Lotta Jones / 020 7377 0280 ext 606 / lotta.jones@tcw.org.uk

South South DSL: Deke Ringrose / 020 7377 0280 ext 620 / deke.ringrose@tcw.org.uk

Head of Safeguarding & Wellbeing (also line manages the School Counsellor):
Ross Adams /020 7377 0280 ext 667 / ross.adams@tcw.org.uk

Head of HR (Mental Health First Aider)
Amrit Claire / 020 7377 0280 ext 615 / amrit.claire@tcw.org.uk

Director of Operations is the Advanced Mental Health Lead and also line manages the Head of Safeguarding & Wellbeing and Head of HR:
Amy Jones / 020 7377 0280 ext 665 / amy.jones@tcw.org.uk

7.4. Looked After Children (LAC) and previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse, including neglect. Staff need to have the skills, knowledge and understanding to safeguard Looked After Children in recognition of their heightened susceptibility to harm.

The DSL and Designated Teacher will work with relevant agencies and take immediate action to safeguard and provide support to this particularly vulnerable group of children.

TCW's Designated Teachers are:
East School: Isabella Griffin / 020 7377 0280 ext 632 / isabella.griffin@tcw.org.uk
South School: Elise Hayden / 020 7377 0280 ext 729 / elise.hayden@tcw.org.uk

Designated Teachers work with the Safeguarding Team and Teaching & Learning team to consider and promote the individual educational outcomes of Looked After Children and Care Leavers, and ensure TCW is doing all it can to meet these. This includes working with Virtual Schools and/or the local authorities' Personal Advisor, and wider staff being aware of the special attention required for this particular group.

7.5. Students with Special Educational Needs and Disabilities (SEND)

Children with special educational needs and disabilities or physical health issues can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- Professionals and other adults making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEND and disabilities or certain medical conditions being vulnerable to experiencing peer exclusion and isolation and being disproportionately impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs
- Information around a child or young person's physical or medical condition may not provided to a school meaning they are repeatedly sent without essential medication, thereby putting them at risk
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- These children may be isolated from others, and are more likely to be dependent on adults for care, including intimate care
- These children may have issues over cognitive understanding – for example - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours at school, without understanding the consequences of doing so.

For some disabled children, their dependency on parents and carers for practical assistance in daily living, including intimate personal care, may increase their risk of exposure to abusive behaviour. Some children may also have an impaired capacity to resist or avoid abuse. Looked After Disabled Children may be particularly susceptible to possible abuse because of their additional dependency on residential and hospital staff for day to day physical care needs.

Further information on safeguarding SEND children is available in the non-statutory guidance Safeguarding Disabled Children (2009), NSPCC Safeguarding Children with Special Educational Needs and Disabilities (May 2022), and NSPCC Safeguarding d/Deaf Children and Children who have disabilities at greater risk of abuse (June 2024), but staff should **always** speak with the DSL and SEN Lead in the first instance.

All staff are regularly trained to understand and be aware of the additional barriers that exist when safeguarding SEND children. All staff need to be aware that SEND children may be more vulnerable

when online and using digital platforms, and it is important that Online Safety lessons and related advice are tailored to their individual needs.

TCW considers every single student's needs individually. Particular emphasis is placed on meeting the needs of SEND students and any those with physical health conditions. Appropriate resources will be made to meet the individual needs of these students.

Information on student needs are collated through the referral process, and other documentation such as Individual Education Plans and Education Health Care Plans. Support for individual needs will be outlined in student Risk Assessments (refer to Risk Assessment policy) which will be regularly reviewed and updated by Teachers and other staff. Students can also share preferences with their Teachers.

Any student can contact the DSL, Counselling and Curriculum teams, and Headteacher at a jointly managed student question inbox at **voice@tcw.org.uk**. This provides a direct channel for students to communicate questions, comments, concerns, compliments, or anything they wish to ask.

7.6. Children Absent From Education & Children Missing Education

Children Absent from Education, whether prolonged or on repeat occasions, can be a vital warning sign of a wide range of safeguarding issues and is a potential indicator of abuse and neglect, including child sexual abuse, child sexual exploitation, and child criminal exploitation (county lines).

TCW closely monitors attendance, absence, suspensions and exclusions. In accordance with the DfE's statutory guidance Working together to improve school attendance, TCW follows up on absences and addresses persistent absence and lack of sufficient contact from parents or carers as part of its safeguarding duty. Such an approach prevents the risk of these children becoming children missing education in the future. Staff address daily absence and persistent absence as soon as these problems emerge.

Staff should be alert to children already known to be vulnerable going missing from education, especially children known to a social worker and Looked After Children, since absence from education may increase known safeguarding risks within the family or in the community. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

When a student does not return to school and the whereabouts of them and their family are not known after we have made initial inquiries, we will refer to the students' Local Authority using local guidelines.

Please refer to TCW's Attendance Policy.

7.7. Supporting Gender-Questioning Students, Social Transition, and Parental Engagement

In line with new requirements, TCW and its staff will **not initiate or actively encourage social transitioning** for gender-questioning Students, regardless of age. Staff should not proactively introduce or share information or resources in a way that promotes or leads social transition. Any Student support in this area should be entirely Student-led, and only undertaken with awareness and close collaboration with the DSL.

Staff must **never promise absolute confidentiality** to Students around disclosures or social transition requests, as parental involvement is standard safeguarding protocol.

Staff must **distinguish between general discussions around gender or exploration of feelings, and explicit requests for 'institutional' (formal gender-related information) changes or gender-specific facility or activity arrangements** that would constitute a *social transition request*. TCW uses single-occupancy unisex facilities, reducing common practical gender-related issues.

Under 18 Students' Social Transition Request

A **social transition request** occurs when a student or parent asks the school to make formal changes to a pupil's presentation or treatment to facilitate presenting as the opposite biological sex (e.g. changes to Student names, pronouns, or any gendered facility or activity arrangements).

All requests for formal gender-related changes (e.g. pronouns, any gendered facility or activity arrangements) must be treated within a safeguarding context and immediately be shared in line with TCW's safeguarding procedures. The DSL will **assess if the situation constitutes a social transition request**.

Any Student social transition requests, or where gender-questioning forms part of a safeguarding concern, **DSLs will ensure parents are engaged as a priority**. Parental involvement may only be delayed or withheld in rare, exceptional circumstances where the DSL assesses that notifying parents would expose the child to a direct risk of significant harm (e.g, severe physical abuse or domestic violence). This decision must be fully documented on MyConcern and reviewed regularly.

Student's biological sex must remain **accurately recorded** across school systems. All discussions, assessments, parent consultations, and final decisions must be formally recorded and securely stored.

Only the DSL can formally initiate social transition changes at TCW (e.g. changes to Student names, pronouns, or any gendered facility or activity arrangements).

Before reaching a decision on any social transition request, the DSL will conduct a **thorough safeguarding assessment** considering the best interests of the child, their age, developmental stage, mental health, special educational needs (SEND), wider contextual factors, and the input from Parents. Primary-aged pupils require heightened caution.

Post 18 Students' Social Transition Request

Anyone over 18 years old is an Adult. Gender-reassignment is a protected characteristic (Equality Act 2010). This covers anyone proposing to undergo, currently undergoing, or who has undergone any part of a transition process, be it social, legal or medical.

P18 Students have the capacity to make their own decisions about their name, pronouns, and how they present — including where a student has SEND or additional support needs (Mental Capacity Act 2005). A general vulnerability or support need is not, by itself, a reason to doubt capacity for this specific decision.

P18 Students expressing wishes to change their name, pronouns, or related details on TCW systems and in day-to-day school life should have this passed to the DSL who will confirm these changes. **There is no requirement to involve parents/carers**. The DSL will act accordingly if there is a specific, documented concern about the student's capacity to make this decision has separately been identified. Depending on the Students' current situation, the DSL will show professional curiosity to understand how the Students' social transition may be received by those around them. This may prompt offers of relevant support.

Children Missing Education are children of compulsory school age who are **not registered students at a school** and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

8. Post 18 Students and Safeguarding

Students at TCW aged between 18 and 25 years old are described as 'Post 18' students.

The Complete Works (TCW) recognizes the unique safeguarding needs of post-18 students within a mixed-age school environment, particularly where younger students are also present. This section outlines our approach to ensuring the safety and wellbeing of all students while fostering a culture of respect, inclusivity, and compliance with statutory safeguarding duties.

TCW staff should follow the same safeguarding procedures for all Students, regardless of their age.

Legal and Policy Framework

- Post-18 students are considered adults and may fall under the Care Act 2014 if they are deemed vulnerable. Safeguarding responsibilities for post-18 students align with adult safeguarding principles and statutory duties for children under 18.
- All safeguarding measures will ensure compliance with relevant statutory guidance, including Keeping Children Safe in Education (KCSIE) and the Children Act 1989, where applicable.

Risk Management in a Mixed-Age Environment

- **Risk Assessments:** Comprehensive risk assessments will be conducted to identify and mitigate potential safeguarding risks associated with post-18 students interacting with younger peers.
- **Behavioural Expectations:** Clear boundaries are set to ensure appropriate relationships between post-18 and younger students. This includes guidance on maintaining professionalism and avoiding situations that could be misinterpreted or cause harm.

Responsibilities and Support for Post-18 Students

- **Training and Awareness:** Post-18 students will receive guidance and training on safeguarding responsibilities within the school, including their role in ensuring the safety of younger peers.
- **Tailored Support:** Post-18 students will have access to welfare and support services to address their specific needs, such as mental health resources, career advice, or independent living skills.

Safeguarding Younger Students

- Post-18 students are reminded of their responsibility to act as role models and adhere to the student Code of Conduct.
- Any concerns regarding post-18 students posing a risk to younger peers will be addressed promptly following the TCW Safeguarding Procedures, or with reference to TCW's Behaviour & Conduct policy.

Reporting and Managing Concerns

- Concerns regarding the behaviour of post-18 students must be reported immediately to the Designated Safeguarding Lead (DSL) following the same procedures outlined in this policy.
- Information-sharing will be handled with sensitivity, balancing the confidentiality rights of adult students with the safeguarding needs of younger students.

Separate and Supervised Spaces

- Where practical, TCW will provide separate areas or activities for post-18 students to minimise potential safeguarding risks. Shared spaces will be carefully supervised by Staff.

Safeguarding Measures for post 18's

- All staff are responsible for ensuring a safe, respectful environment that upholds the wellbeing of students aged 18-25. When working onsite, TCW implements various measures to ensure that the safety of younger students who may share the building is not compromised.

- The majority of our Post 18 students tend to be working cognitively at a level which is similar to our younger students. Staff should follow the same protocols, maintaining TCW's Code of Conduct and expectations around professional boundaries, including if the students are adults.
- TCW does not expect Post 18 students to hold any further responsibility to that of younger students.
- All students are individually risked assessed for their setting and peers and are not permitted onsite if there are any concerns. Post 18 students are not taught in the same lessons as their younger peers, but they do share a building. Post 18 students are supervised in communal areas such as break out spaces and interactions between students are monitored.
- Post 18 students are not permitted to leave the school building unaccompanied with a younger student.

Staff Appointments for post 18's

- TCW will ensure that staff members assigned to work one-on-one or in group settings with Post-18 students are of a suitably different age to maintain professional boundaries and reinforce the "teacher-student" relationship. This measure helps uphold clear and appropriate boundaries within the learning environment.

Staff Training around post 18's

- All staff undergo Safeguarding training at induction and regular training where there are government updates at least annually.
- Training at induction includes working with our post 18 students including developmental and social differences between younger students and those up to 25. Staff are trained that students aged 18-25 may still be vulnerable to certain types of abuse and exploitation, and may require additional support due to personal or mental health challenges. Staff are required to follow the reporting procedures outlined in this policy if there are any concerns.
- As previously outlined, our older TCW students tend to be working at an academically lower level to that of their chronologically matched mainstream peers. Staff are taught to recognise social cues and communication styles and are guided on setting boundaries to respect any differences to ensure operation of a conducive learning environment.
- All staff receive training on the additional safeguarding protocols that apply when working with adult students onsite amongst younger students. As previously stated, all students are individually risked assessed for their setting and peers and are not permitted onsite if there are any concerns. Staff are aware of recognizing vulnerability among younger students and being vigilant against any inappropriate behaviour and following our usual reporting for this.

9. Contextual Safeguarding (inc Extra Familial Harm)

TCW recognises that young people can experience abuse, neglect and exploitation in contexts outside their families. Working Together to Safeguard Children makes clear that safeguarding includes "protecting children from maltreatment, whether that is within or outside the home, including online". These extra-familial threats or harm may arise at school and other educational establishments, from within peer groups, or more widely from within the community and online. Young people can be vulnerable to multiple threats simultaneously, including exploitation by criminal gangs and organised crime groups (such as county lines or financial exploitation), human trafficking, online abuse or exploitation, peer or teenage relationship abuse (such as stalking or harassment), child sexual exploitation, serious youth violence and the influences of extremism leading to radicalisation.

9.1 Our whole-school approach to contextual safeguarding

As part of our whole-school safeguarding approach to contextual risks, TCW has developed curriculum, policy and practice that:

- Educates young people about risks and potential threats
- Responds promptly and effectively when concerns arise
- Focuses on both preventing harm and protecting young people from harm outside the home

9.1. Identifying and mitigating contextual safeguarding risks

TCW will regularly use student-led intelligence alongside staff observations and multi-agency information to identify potential risks both within and outside of our school communities. We will use safety mapping exercises to identify:

- People who may pose a risk
- Places where extra-familial harm could occur
- Environments that present safeguarding concerns

Where safety mapping identifies risks, we will focus on interventions that address these wider environmental factors by partnering with other professionals, external agencies and community establishments to create safer spaces for our young people.

9.2. Staff contextual safeguarding training

All colleagues will be trained to understand and identify contextual safeguarding risks and threats, including:

- Signs that a young person may be experiencing harm outside the home
- How extra-familial contexts can impact on young people's safety and wellbeing
- How to report concerns using our standard safeguarding procedures

9.3. School and Community safeguarding contexts

We recognise that schools can be sites where young people both experience harm and are safeguarded from it. Education providers play a vital role in sharing information about children, including concerns about abuse, neglect, exploitation and wider social and environmental factors, including extra-familial contexts.

If students experience abuse, violence or exploitation linked to TCW or school relationships, we will conduct a prompt and proportionate contextual safeguarding review. This review will:

- Consider every individual involved
- Examine aspects of the school environment to build a picture of how we can be safer for students
- Include a range of methods such as:
    - Gaining feedback from students, staff and parents
    - Observations of the school environment
    - Review of policies, procedures and physical spaces
    - Analysis of incident patterns and trends
- Result in an action plan with clear timescales for implementation
- Be overseen by the Senior Leadership Team of the school

9.4. Reporting contextual safeguarding concerns

As with all safeguarding concerns, if colleagues have concerns or become aware of circumstances within school where young people are currently experiencing or are at risk of harm (whether originating from within the school community or from external factors affecting our students), they must report this to the DSL at the earliest opportunity. The Senior Leadership Team of the school will then decide whether a contextual safeguarding review is needed and what immediate safeguarding action should be taken.

If there are any specific wider community implications, learning points or outstanding contextual concerns beyond the remit or reach of TCW, the senior leadership team will seek to alert other community

stakeholders to these. For example, this could include local police, school networks, DSL Forums, or local businesses.

10. Elective Home Education

- TCW recognises that parents have a legal right to electively home educate their child at home; however, it is expected that the parents' decision to do this is made with their child's best education and best interests at its heart. Staff should be aware that even though most home educated children have a positive experience, 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.
- When a parent informs the Headteacher of their intention to electively home educate their child, the school will convene and coordinate a meeting between the Local Authority, relevant school staff, parents and all key professionals currently working with the child and family. In accordance with local authorities' policies this meeting has to occur before any final decision is made by the parents, to ensure that the best interests of the child have been taken fully into account and carefully considered. The occurrence of this meeting is especially important when the children have known vulnerabilities including Children known to a Social Worker and SEND children.

11. Confidentiality and Consent

- **Legal Framework:** The Data Protection Act 2018, UK GDPR, and the statutory Information Sharing Duty (Section 16LA of the Children Act 2004, introduced via the Children's Wellbeing and Schools Act 2026) provide a clear legal basis for sharing information to safeguard children. Data protection and confidentiality are <u>not</u> barriers to sharing. DSLs will need to request confidential information relating to safeguarding from other organisations involved with a Student or Family, on a regular or occasional basis.
- **Proactive & Early Sharing:** Staff must act independently without assuming a colleague will take action. Sharing should occur quickly and as soon as Actual or Potential Harm is identified. This helps DSLs to assess needs and mitigate risks before harm escalates. Delayed or unshared information frequently leads to preventable harm. If in doubt, staff must consult the DSL or DDSL.
- **Internal Reporting & Communication:** Safeguarding information requires strict confidentiality and must be discussed primarily with the DSL or DDSL (or qualified members of the Headteacher, Head of Safeguarding & Wellbeing, and SLT teams). Any staff member may report directly to children's social care if needed, but must notify the DSL promptly afterward.
- **Consent & Statutory Duty:** Under the 2026 statutory duty, <u>parental consent is not required</u> to share information where doing so is lawful, necessary, and proportionate to safeguard a child. Lack of parental consent must never delay or prevent information sharing with statutory agencies, unless professional judgment specifically determines that sharing would be directly detrimental to the child - this decision will be carefully recorded.
- **Transparency**: where it is safe to do so, TCW will be open and transparent about why information is shared, what might be shared, and how it will be used.
- **Record Keeping:** All information sharing decisions—whether the choice is to share or withhold information—must be formally recorded along with the rationale. Child protection files must be stored securely and separately from standard school records in line with the Data Protection Policy.

12. Voice of the child

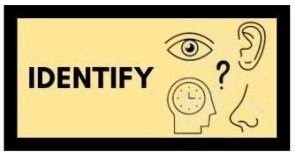
- All those with a responsibility to safeguard children need to recognise that it takes great courage for a child to share a concern and speak up about any form of abuse, especially sexual abuse. There are many reasons why children are not able to articulate what they are experiencing. Children may feel embarrassed, humiliated, or are currently being threatened by the perpetrator of abuse. Also,

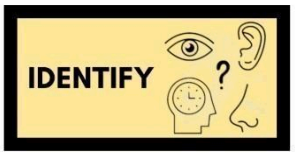
children may not feel ready or know how to tell a trusted adult that they are being abused, exploited, or neglected. They may not even realise that their experiences are harmful.

- The barriers preventing a child communicating their concerns may be connected to their vulnerability, disability, sexual orientation, gender-questioning, or language. The child's behaviour may be the first sign that a child has experienced harm. Staff will therefore exhibit ***professional curiosity*** and understand that a child may be communicating a concern through their behaviour, and take a safeguarding approach when responding to behaviours.
- Staff are aware of and promote the systems in place at TCW which enable children to share their concerns and report abuse confidently, because they know that their concerns will be taken seriously by staff and action will be taken to safeguard and protect them. It is also important that staff determine how best to build safe and trusted relationships with children and young people which facilitate communication and the sharing of concerns.
- All TCW students have their own school email address. TCW has an open student inbox (voice@tcw.org.uk) for any student questions, queries, concerns or support. This inbox is monitored by a selection of staff connected to safeguarding, counselling, curriculum, PSHE and senior leadership. This is promoted when a student joins TCW, in regular communications with students and families, and through contact with teachers.

13. TCW Safeguarding Procedures: recognising abuse and taking action

In the event of a safeguarding concern, staff, trustees or anyone working for TCW must follow the procedures set out below:





Staff should use their knowledge and understanding from their safeguarding training, safeguarding updates, reference information from Ariel (including IEPs, EHCPs and Risk Assessments), MyConcern chronologies, as well as their own experience to IDENTIFY either or both of the following:

Actual harm (i.e. mistreatment) or

Potential harm (i.e. symptoms or signs of mistreatment).

All staff should be aware that **anyone can be abused**, not just our students, and that staff can identify and report safeguarding concerns relating to *anyone*.

Concerns are usually based on disclosures (things that are said), observations (things you see, smell etc) or particular behaviours. Any or all of these things can give rise to a concern.

Remember that individuals may well feel ashamed or frightened about what they have experienced, or be worried that telling someone may get them (or someone else) into trouble. Individuals may

not realise that what they are experiencing is abusive, or believe that they are somehow to blame for what has happened to them - they are not.

How you conduct yourself when identifying a safeguarding issue will make a difference to the individual involved, as well as what they are prepared to share with you.

When Identifying any Actual or Potential Harm, make sure you:

- **Always stay calm and relaxed**- do not show that you are shocked or upset, even if that is how you feel. Do not give the impression that the concern is a problem for you.
- **Consider the Student's individual communication needs.** Some Students may find direct face-to-face conversation particularly difficult when distressed. Where appropriate, consider alternatives such as writing, drawing, typing, using visual prompts, sitting alongside them rather than opposite them, or involving a trusted adult. Adapt how you communicate without changing what needs to happen to keep them safe.
- A calm tone, straightforward language, patience and consistency can **communicate safety in other ways** even when a Student is distressed, rejecting support or unable to explain what is happening. Avoid becoming increasingly urgent or demanding simply because the Student is not responding.
- **Allow silence or time for processing.** Silence does not necessarily mean that a Student is unwilling to engage. They may be overwhelmed, frightened, unsure how to describe what has happened, or simply need longer to process the question. Avoid filling every silence with another question; give them time and communicate that you are still available.
- **Listen to them carefully** and pay attention to details. Give them **time and space to talk freely**. Allow silences. Always believe what they tell you.
- Be **'Professionally Curious'**. This means paying attention to them, showing interest and appropriate curiosity - what they say, what you notice about them, how they are acting. Showing interest and asking questions tactfully can open up conversations around potentially concerning observations or behaviours, but can also help identify positives and develop shared understanding or rapport.

  The best way of showing curiosity is by using **Open Questions** in your conversations (e.g. "*Where did you get those from?*", "*Who else was with you?*", "*What day did that happen?*", "*Where did you go afterwards?*", "*What happened after that?*", "*How did they know that you were there?*").

  When identifying safeguarding concerns it is recommended you avoid asking "*Why*" questions (e.g. "*Why did they do that?*") as this can suggest we expect them to account for their actions, or that we expect them to have knowledge of other people's motivations.

  Open questions help you to **Establish The Facts** around a Students' situation, without adding your own bias or implied judgements. Not asking, exploring or establishing the facts around a comment, action or concern can lead to a more passive approach, where only 'observations' are reported (e.g. "*Student muttered something about 'smoking loud' to F*"). Out of time and context these are very challenging for a DSL to follow-up meaningfully. This can be avoided by Staff taking a pro-active and professionally curious approach with their Students. This should mean Staff are able to be clear about what *Actual* or *Potential* harm has occurred, and reflect in their report how they have exercised their professional curiosity (e.g. "*Student muttered something about 'smoking loud' to F. I took him to one side and asked him what was being discussed, he replied 'nothing' and that he was just joking around. The student did not smell of weed or appear stoned so we continued the lesson. I am reporting as I am concerned a student may be looking to sell weed to F, who is also wanting to make friends".)*

- **Withdrawal, avoidance, anger or rejection may communicate something** about how safe or able the Student feels to engage at that moment. Regulation and relationship may need to come before more conversation.

- Be careful to avoid any 'leading questions', where a potential answer is present in the question (e.g. "Did he hit you with a belt?", ask "*What did he hit you with?*" instead).

- **Do not put extra pressure on them** to share anything they are not comfortable sharing, but remember it is very helpful for the DSL to know *Who, What, Where, When* about any concern as this helps our assessment of the situation. Be mindful of asking the same questions repeatedly. Once sufficient information has been shared to identify a safeguarding concern, the priority should be listening, recording accurately and following safeguarding procedures rather than trying to obtain a complete account - the Student should not feel responsible for convincing you that something is wrong.

- A Student refusing to talk, minimising a concern or pushing an adult away does not necessarily mean that they do not need support. **Remember that Students can be particularly worried** about what happens next and about feeling that they have lost control of the situation. This may be especially important where previous experiences of trusting adults have not always felt safe, consistent or predictable. Try to maintain connection with them while holding appropriate boundaries.

    - You can **acknowledge how the Student feels without agreeing with their view of the risk**: *"I can hear that you don't think this is something to worry about. I am worried though, and part of my job is to help keep you safe and I will need to chat to the DSL to see if they share my worries."*

    - If communication about them directly is proving challenging, you could **try shifting the focus** — *"Would anyone else be worried about you doing that?"* or *"What do you think I would be worried about in that situation?"* can be helpful to try and understand their views on their own safety.

    - You can **notice and name what you see without assuming what it means**. For example: *"I've noticed you've gone very quiet since we started talking about this"* or *"I can see this is difficult to talk about."* This can communicate curiosity and care without putting words into the Student's mouth or interpreting their experience for them.

    - If a Student seems concerned, but unwilling or unable to discuss things with you, you could **explore who they may feel comfortable communicating with**: *"If you would rather tell someone else than me, that is absolutely fine, who would you rather talk to, I can see if they are available?"* Or *"Would you find it easier to write it down?".* Be mindful that not all Staff may be contactable.

    - As a last resort, if a Student is struggling to communicate about an urgent concern, you can switch to using more direct and simple **Closed Questions** (i.e. with a Yes or No answer) to check basic situations, such as if they feel safe enough to go home — *"Do you feel safe at home?"* or "*Do you feel safe at the placement?*".

<u>Remember</u>

- **Never discuss any safeguarding your concerns with the family** unless you have been specifically asked to do this by consulting with the DSL.

- **Never view potentially concerning digital or other images raised by Students** (including nudes or semi-nudes regardless of if they are consensual or non-consensual, pornographic material or harmful AI generated content). Use your professional curiosity to ask them to describe what they have seen, and establish the facts of who shared it, where, when and how they viewed it. Call the DSL immediately to discuss your concerns, or support your Student to speak directly to the DSL if this is more appropriate. If these images were unavoidably viewed, you must let the DSL know.
- **Do not take any photos or videos of the student themselves** in relation to the safeguarding concern. You can take and attach photos of a Students work to your MyConcern report, or the environment in which a concern occurred, if visual context is required (e.g. a photo of a chair that a Student has broken in frustration, or a photo of drawings depicting suicide).
- If ever you are unsure, or really stuck, or exhausted this advice, contact the DSL for guidance.to discuss the situation - we welcome questions.

Once identified, it is vital that you act <u>quickly</u> on your concern.

No student should *ever* be given the impression that they are creating a problem by sharing a concern, or something that they are worried about, even if it is difficult to be part of.

In order to Respond to the direct disclosure of a safeguarding concern from a Student, make sure you:

- **Manage any presenting behaviour**, de-escalate situations, help the Student to calm and regulate their emotions, whilst following behavioural protocols and keeping yourself safe.
- Reassure them that **they have done the right thing in telling you**, or acknowledge their honesty or bravery in sharing this with you. Remind them you want to **help them to be safe and well** but **you cannot keep secrets**.

  Never suggest that they should have done anything different (e.g. "*Why didn't you just leave?*" or "*You should have told me sooner*") as this implies that they are somehow to blame for what has happened to them. They are not.

  Avoid phrases that could be heard as an attempt to 'reduce' their experience (e.g. "*Oh I'm sure it can't have been that bad*" or "*Don't worry, everything is going to be ok*" - no one can make this promise).
- Explain what will happen next - **tell them that you will have to pass this information on**, but only to those who absolutely have to know (i.e. the DSL). Never promise to keep a secret.
- Ask **what they hope will happen next**, **or what they feel would help their situation**. (e.g. "*What do you want to happen next?*" or "*What is most important for you right now?*" or "*What do you think will help to keep you safe?*"). Understanding their wishes, or their 'voice' helps us to keep them as the central priority in the concern. Their views should be added to your MyConcern report.
- Remember, there is no such thing as a 'joke' in safeguarding - real disclosures are frequently retracted in this way - but **still need to be followed up properly**. Staff should report this as usual, but mention that it was described as a 'joke'

Responses to avoid

- **Safeguarding a Student should never sound like a threat** — this will likely deter Students from sharing in the future. Telling a Student *"I will have to report this to safeguarding"* can sound punitive and threatening, not supportive. Likewise, referring to sharing safeguarding information should not be used as a deterrent to manage behaviour: *"If you don't stop doing that I will report to safeguarding."*

- Where something does need to be shared, **avoid being vague or secretive** about what will happen next. Phrases such as *"I need to tell someone"* without further explanation can increase uncertainty and the Student's sense of losing control. Instead, be as transparent as you safely can: *"I'm concerned about what you've told me, so I need to speak with the DSL/safeguarding team because part of my job is helping to keep you safe. I want you to understand what I'm going to do next, and I'll involve you as much as I can."*

Remember

- **Do not discuss your concerns with anyone else** until you have consulted with the DSL.

Next, Staff will need to judge if urgent follow up for their concern is needed, or if they require any advice from the DSL.

CALL 999?

If a child or someone else is in immediate danger - (i.e. in an emergency situation when there is a **danger to life; risk of serious injury; or a serious crime is in progress or about to happen**), staff should find a safe place and **dial 999** and report this to the Police, Ambulance or Fire services as appropriate.

After calling 999, **you should call the DSL and alert them to the situation,** as soon as it is safe to do so.

If the student is with you, staff should consult with the DSL before allowing a student to leave them or go home. This is in case the DSL needs to confirm if it is safe for the student to leave, or if other arrangements are necessary.

CALL DSL?

If you are not clear about what you have Identified you should call the DSL for advice.

You should also call the DSL if what you have Identified is urgent. In other words - situations that are **likely to cause significant harm** and are **imminent** (i.e. in the next few hours). Some examples of urgent situations would include: a student disclosing that their parent said that they would punch them when they get home from school; another staff member using their personal phone to take photos of students; a student absconding from a lesson in the library whilst heavily under the influence of drugs; a student shares that they are intending to visit an adult girlfriend that has previously sexually abused them; another staff member knowingly not reporting a clear safeguarding concern; a student leaving for the day mentions that their Mum has deliberately

hidden all of their inhalers at home as a punishment. In such situations staff should also consult with the DSL before allowing the student to leave them or go home, in order for the DSL to confirm if this is safe for the student, or if other arrangements must be put in place.

When Actual or Potential harm is identified, staff should share or discuss their concerns with the DSL from the students' registered school as soon as possible:

DSL East School: Lotta Jones 020 7377 0280 ext 606, lotta.jones@tcw.org.uk

DSL South School: Deke Ringrose 020 7377 0280 ext 620, deke.ringrose@tcw.org.uk.

If one DSL is unavailable on their phone, you will be automatically transferred to the DDSL or Deputy Head, who is the Deputy DSL.

East School DDSL: Kiera Leaper / 02073770280 Ext 821/ kiera.leaper@tcw.org.uk

South School Deputy Head: Rahsaan McClymont / 02073770280 Ext 719 / rahsaan.mcclymont@tcw.org.uk

If neither DDSL or Deputy Heads' are available, you will be transferred to the Head Teacher.

The Head of Safeguarding & Wellbeing, Ross Adams 020 7377 0280 ext 667 or ross.adams@tcw.org.uk can also act as DSL if other cover is unavailable.

Whilst it is never expected that any further (non TCW) support should be required, staff should know they can also contact the charity NSPCC on 0808 800 5000 during office hours if they need advice on the appropriate safeguarding action.

The DSL will assess concerns, and make the relevant referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. The DSL will follow NSPCC guidance about if and when to contact the police.

Informing families

Staff should NOT inform families when they have identified a concern, unless they have consulted with the DSL. The DSL is responsible for ensuring this is done appropriately, and this will depend on assessing the individual concern. The DSL will arrange for families to be informed, or undertake this themselves within an appropriate time frame.

Most low-level concerns will be discussed by the DSL or other key office staff as soon as possible with the family or other professionals.

If there is any likelihood of additional harm coming to the child as a result of sharing concerns (e.g. with Domestic Violence; or Forced Marriage) the DSL will not seek consent or inform the family before referring to the appropriate agency. How they are best informed will be discussed with the referral agency.

Making a referral

It is important to note that anyone can make a referral for external support**,** however **we would always advise this is done by the DSL**. If you have to make a referral directly without discussing with the DSL, ensure that you speak to the DSL as soon as possible after you have made the referral. You will also need to report the concerns and referral on MyConcern.

For further information about the referral making process in specific boroughs, and to find their referral forms, please select the below borough where the student lives, you will be directed to their Safeguarding Children Partnership.
City and Hackney *http://www.chscb.org.uk*
Haringey *https://haringeyscp.org.uk/*
Islington *https://www.islingtonscb.org.uk/Pages/default.aspx*
Lewisham *https://www.safeguardinglewisham.org.uk/lscp*

Southwark *https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/*
Tower Hamlets *http://www.childrenandfamiliestrust.co.uk/the-lscb/*

ALL student safeguarding concerns should be added by Staff to the secure MyConcern platform.

Staff submitting a new safeguarding concern on MyConcern should do so within 2 hours of identifying the concern.

If the DSL is aware of the safeguarding concern (for example via a phone call) then a written submission of the concern needs to be submitted on MyConcern by 4pm of the same working day.

The 3 main ways Staff use MyConcern are:

1. **Report A Concern** (for any new concerns)
2. **Update** an existing MyConcern (Concern>Chronology>Add Concern Update)
3. Completing **Tasks** set to you by the DSL that are related to an existing MyConcern (Dashboards>Tasks)

IMPORTANT: if **another member of staff is implicated in any way as potentially causing Actual or Potential Harm to a student**, call the DSL to discuss this in confidence immediately. Concerns with staff implicating or demonstrating any potentially poor or harmful practice should NOT be put on MyConcern where it can be seen by other staff. Staff are expected to self-report any situations that may imply poor practice or not following TCW procedures.

All staff receive induction training on how to use MyConcern. Once registered, it can be accessed by any member of staff using https://www.myconcern.education/Account/Login alongside their work phones (for 2 Factor Authentication) and the Google Authenticator app. MyConcern is accessible by web browsers on work phones as well as on TCW Chromebooks and Laptops.

It is recommended that you check your access to the MyConcern website regularly to avoid any access issues arising when you need to be submitting a concern under time pressure.
Advice for MyConcern access problems is in the Teacher Handbook. For any further issues, you can contact the MyConcern helpline (M-F, 9-5pm) on 0330 6600 767. They will ask you to confirm TCW's 'school number' which is 2116006.

Recommendations for good report writing on MyConcern would include:

- The exact order of events, times and durations in which the events took place, with details about what prompted your concerns.
- Descriptions of any physical and/or behavioural signs, who noticed and when.
- Include exact details of any verbal disclosure, using "speech marks" around the words used, even if they are offensive. Records of situations should be as accurate as possible. An outline of any related conversations is also useful.
- A description of the child's emotional state and behaviour (for example, "sat slumped, crying and sobbling, covering his face"; "her expression was blank, saying "I suppose you have to report that"; "he was restless and couldn't sit still, then he pushed the work off the table, raised his arms and shouted "i hate this" very loudly")

- Ensure you keep the information in your concern factual. Omit emotively descriptive language from your report, unless it helps to explain specific actions. Emotive descriptions make safeguarding situations harder to assess accurately and objectively. If you would like to discuss the impact of safeguarding concerns on you personally, please contact a DSL, the Head of Safeguarding & Wellbeing, or our Counsellor.
- All injuries (even if not concerning), where they are and what they look like (colour, shape, size, condition etc). Please do not ask a student to show you injuries located in areas that would normally be covered by clothing. You can however ask them to describe to you such injuries. Include a body map if it's relevant, but never take any photos or videos of a Student or a Students' injuries in relation to a safeguarding concern.
- An outline of any explanations that have been provided for the Students' injuries.
- An indication of whether anyone has been alleged to be the abuser and the details of this person. Never discuss this with the alleged person, even if they are present, or you know them.
- Clarification as to whether the person making the report is expressing their own concerns or passing on those of somebody else.
- Any additional information you see as relevant.

13.1 Racism, Discrimination and Derogatory Behaviour

Staff should recognise that racist, discriminatory and derogatory behaviour can cause significant harm and may, depending on the circumstances, constitute a safeguarding concern.

Staff should not dismiss racist or discriminatory behaviour as "banter", "just a joke" or normal behaviour between young people. Concerns should be reported in accordance with TCW's safeguarding and behaviour procedures so that the circumstances, impact and wider context can be considered.

Staff should remain alert to whether an incident is isolated or forms part of a pattern of behaviour, whether there is a power imbalance or targeting of an individual or group, and whether the child experiencing the behaviour may require additional safeguarding support.

Further information about TCW's approach to racism, discrimination, equality and anti-racist practice is set out in the Anti-Racism Policy and Equality & Diversity Policy.

14. After you have reported a safeguarding concern

Staff should not discuss concerns with parents or carers until they have consulted with the DSL.
If parents/carers ask you about concerns, you should tell them to contact the DSL or Deputy Heads.

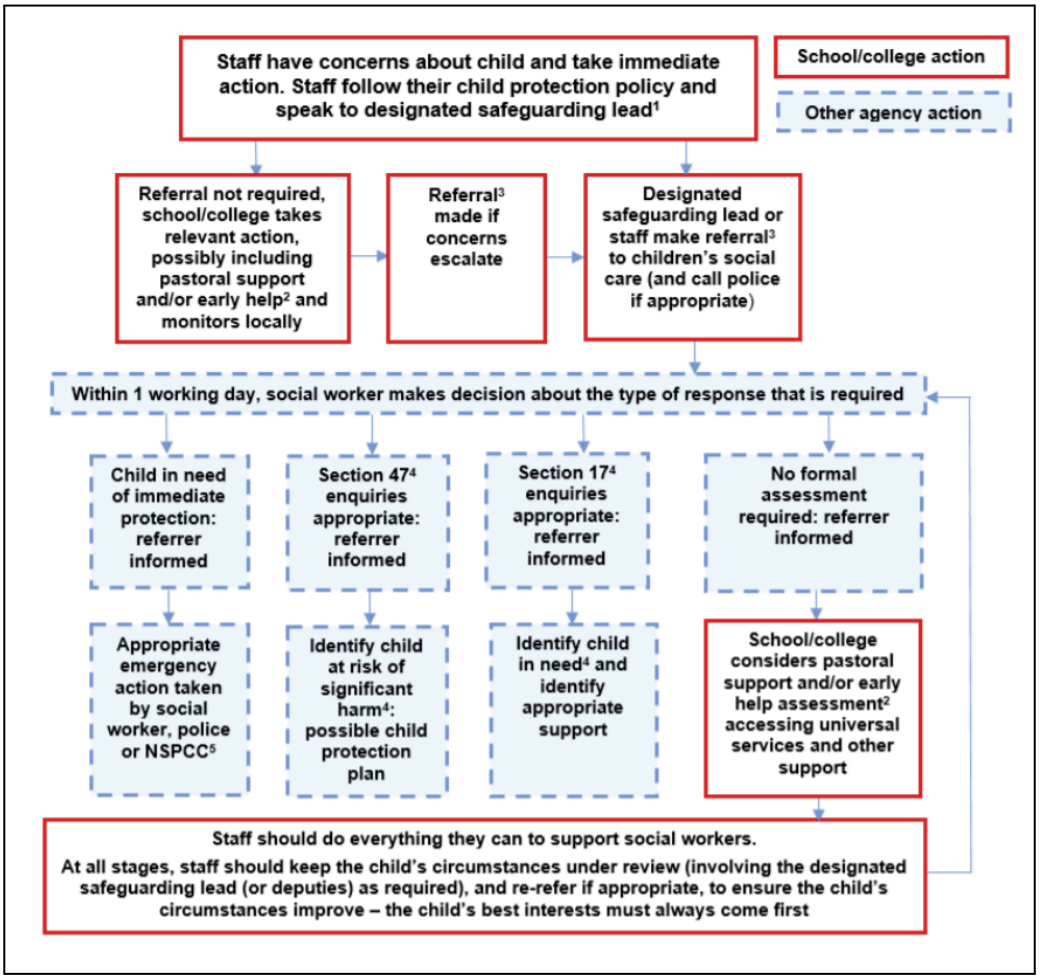
What happens after a concern is submitted:

- The DSL will assess your concern.
- The DSL will ask further questions (when required) in the event of a suspicion or disclosure. Where appropriate, the DSL may request staff to ask further questions to the child or their parent/carer.
- If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the children's social care team before doing so.
- In the case of allegations of child-on-child abuse (including harassment and violence), we would normally notify the parents/carers of all the students involved. However, if a crime is likely to have been committed, we will take the police's advice on who to notify before doing so.
- If you want to understand more about what safeguarding action is being taken and why, please check for Updates on MyConcern initially, or email the DSL with your query. The DSL may not be able to share everything with you, but will be able to explain our actions and perhaps why some

situations are confidential.

- **Maintaining the relationship after a safeguarding concern** can be as important as how we respond initially. A simple follow-up with the Student such as *"How are you feeling about what happened yesterday?"*, *"Is there anything about what happens next that you are unsure about?"* or *"What would help you feel supported today?"* can **reassure them that raising a concern has not changed how you see or relate to them**. You can explain again why action was taken, or comments were shared. You can check what they understand, and see what support they may feel they need at this later point in time. You should Update any initial reports to MyConcern with this information.

<u>Summary diagram of the procedure where there are concerns about a child (no immediate danger)</u>



1 In cases which also involve a concern or an allegation of abuse against a staff member, see point 18 of this policy.

2 Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

4 Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under

section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

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

14.1. Personal support around safeguarding matters

We know that safeguarding matters can feel personally challenging, worrying or upsetting sometimes.

We ask and encourage you to reach out, as TCW provides a wide range of help and support:

- If you feel you may need any personal or emotional support around safeguarding at work, please mention this to the DSL or contact our Counsellor directly.
- If you feel you may want additional training or guidance around safeguarding, please contact the DSL.
- If you have any feedback about how we dealt with your safeguarding concerns, how we have supported you, or if you feel we could do things better, please email ross.adams@tcw.org.uk. We welcome any, and all feedback.

15. Extended School And Off-Site Arrangements and Facilities

- All TCW policies apply whenever and wherever TCW staff and students are working together, including 1:1 or groups onsite, offsite, online, onsite carousel and offsite activities and trips.
- Every students' Risk Assessment features explicit considerations for offsite arrangements and trips. Staff review or update these when planning individual trips. Refer to Risk Assessment templates for further details.
- TCW ensures that unisex single-occupancy toilets (and changing facilities if required) are available for Students, and in separate Staff areas. This helps ensure an inclusive school environment. Offsite facilities used during Offsite lessons, school trips or residentials may vary considerably, and may mean gendered facilities need to be used. Considerations for external facilities for gender-questioning Students with a Social Transition Request will be addressed in advance, included in their risk assessment, and discussed with them wherever this may be required.
- TCW would not normally let other services or activities be provided separately by another organisation on our premises. If we did however, we would seek assurance that the organisation had effective safeguarding policies and procedures in place. This applies regardless of whether or not the children who attend any of these services or activities are pupils on the school register. The safeguarding standards expected of non-regulated external organisations, are set out in the DfE's Keeping Children Safe during community activities, after school-clubs and tuition: non-statutory guidance for providers running out-of-school activities (April 2022).
- We would ensure that all safeguarding requirements were set out clearly in the lease or hire agreement with the organisation, as a condition of use and occupation of the school premises; and that failure to comply would lead to the termination of the agreement.

16. Safeguarding in Remote Teaching

- All remote teaching concerns need to follow the same standard TCW safeguarding procedures.
- All remote lessons are recorded in order for students and staff to be safeguarded.
- Staff should always invite Remote.Education@tcw.org.uk to all remote lessons.
- Staff cameras must be on at all times.

17. Digital Capture, Mobile Phones And Photo Consent

- Staff should not view, download or store any information about student(s) on personal laptops, phones or other devices.

- Do not take any photos of students for the purposes of reporting of any safeguarding concern.
- Do not take any visual images of your students if it is not part of their work. If for any reason you need to take a student's photo, please contact the Education Team to check that TCW had the correct consent to do so. Any appropriate work-related photos should only ever be taken using TCW devices.
- Staff and Students should not have, or use wearable cameras (including glasses) with any digital capture or transmission capabilities onsite.

Please refer to this policy's section on Online Harm, plus TCW's Devices and Use of Equipment Policy and the Behaviour Policy for further information.

18. Reporting Allegations Against Staff & Concerns That Do Not Meet The Harm Threshold

Allegations of harm against staff may indicate that a person who works with children might pose a risk of harm to children if they continue in that role. Any other report with any safeguarding implications against staff may be considered a **Concern That Does Not Meet The Harm Threshold**.

An **Allegation of Harm** is made against any member of staff (including supply staff, trainees or volunteers) contractors and Trustees, when they 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.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

When an Allegation of Harm is made against a member of staff (including supply staff and volunteers), we will follow our Dealing with Allegations policy, and all action taken will be in line with KCSIE 2026 Part 4 and relevant guidance from the local authorities our schools are based in.DSL or other suitable staff will work alongside any external employer or agency safeguarding lead to ensure that all allegations of harm and concerns that do not meet the harm threshold are responded to promptly and in line with external agencies' policies, and best practice, including contacting the LADO, DBS, Police or Social Care wherever appropriate.

Concerns about staff that meet the **Allegations of Harm** threshold above must be reported by any staff, irrespective of the source, directly to the Headteacher for South or East School. Staff should not put these on MyConcern as other staff may see this.

- The Headteacher will ensure that any allegation is put in writing, signed and dated. If the subject of the allegation is the Headteacher then the allegation should be directly reported to the Chair of Governors.
- On receipt of a report of an Allegation (rather than a concern that does not meet the harm threshold), the Headteacher will make immediate contact with the Local Authority Designated Officer (LADO) for an initial discussion. If the allegation concerns the Headteacher, then the Chair of Governors shall make contact with the LADO.
- When an allegation is made against a supply member of staff, the headteacher will be the case manager and take the lead in contacting the LADO.
- Please see Appendix 3 for further information, including the contact details for the relevant borough LADOs.
- Allegations relating to an incident that happened when an individual or external organisation was making use of TCW premises for activities involving children, the Headteacher should seek the advice of the LADO.
- Allegations concerning staff who no longer work at TCW, as well as historical allegations, will be reported to the Police.

Concerns about staff that (at least initially) do not meet the Allegation of Harm criteria set out above are known as **a Concern That Does Not Meet The Harm Threshold** or **Low-Level Concerns**. Staff should report these, and self-report potential concerns about themselves) in accordance with our procedures and alert their line-manager without delay. Please refer to TCW's Staff Code of Conduct.

These concerns may be followed up by the DSL or DDSL if it is thought that improvements to safeguarding practice are required, or there are lessons to be learned. All of these follow-ups are logged in a secure document by the Safeguarding Team.

TCW staff should report every concern they have about any other staff members' conduct, regardless of where and when this occurred, and including online environments, no matter how small or insignificant these concerns may be perceived to be.

19. Complaints And Concerns About School Safeguarding Practices

19.1. Complaints Against Staff

Please refer to the Whistleblowing and Compliments, Comments and Complaints policy.

- Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).
- Concerns or allegations may be brought to the attention of a member of staff in various ways. A child might make a disclosure directly about another member of staff; a parent/carer or other adult may report a concern about what they say they have seen or have been told by a child; or the member of staff might observe an event or behaviour that causes them concern. The protection of students from abuse is the responsibility of all staff, and the DSL ensures that staff and students are aware of how to report concerns of abuse and neglect. Information about how to report concerns of abuse and neglect are given to staff at induction and students and parents/carers at their initial meeting with TCW.
- Any allegation or abuse of a student by a teacher must be reported directly to the Headteacher for the South or East School.

19.2. Other complaints

Please refer to TCW's Compliments, Comments and Complaints policy for further details.

19.3. Whistle-blowing

All staff members have a responsibility to raise concerns about poor or unsafe practice and potential failures in any aspect of our safeguarding arrangements and staff should feel confident that such concerns will be taken seriously by the senior leadership team.

Please refer to TCW's Whistleblowing policy for further details.

If ever a staff member feels unable to raise an issue with TCW, or feels that their genuine concerns are not being addressed fully, they should consider other channels available as set out in the Government's List of Prescribed Bodies and Persons, including the NSPCC Whistleblowing Advice Line (0800 028 0285) which is free and anonymous. More information on this can be found here.

20. Escalation Procedures

External escalations: If, after a referral to Children's Social Care, the child's situation does not appear to be improving, the DSL will consider following local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Usual borough procedures would involve the DSL making contact with the Social Care team manager, followed by the service manager, followed by the divisional director. At every level of escalation

there should be discussion and concerted effort to resolve any professional difference in a positive and professional manner.

Internal safeguarding decisions: If, for any reason, staff do not feel that adequate safeguarding actions have taken place internally, staff should initially raise this with the DSL, then the Deputy Head Teacher and the Head of Safeguarding & Wellbeing simultaneously.. At every level of escalation there should be discussion and concerted effort to resolve any professional difference in a positive and professional manner.

21. Record-Keeping In Safeguarding

Please refer to our Data Protection policy.

- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. Bear in mind that all MyConcern records will be visible to all staff involved with each student. If you are in any doubt about whether to record something, or how, discuss it with the DSL.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual young people will be retained for a reasonable period of time after they have left TCW.
- Records kept after September 2018 will be documented and stored on 'MyConcern' Software. The software requires the DSL to invite specific people to view safeguarding information when necessary and only if deemed to be in the best interests of the young person. Information is shared with other agencies when there is a need to share safeguarding information to effectively safeguard. If information needs to be shared with another agency, a secure email would be sent or it would be shared through 2 password protected logins on 'MyConcern' software
- Records held prior to September 2018 will be held electronically within a confidential safeguarding folder. The DSL, Deputy Head and Headteacher will be the only people to have access to these files. Records are kept secure through having Google Drive logins that are password protected. Records are kept confidential and are not printed unless absolutely necessary. They are then shredded.

21.1. Record Keeping And Data Protection

Please refer to our Data Protection policy.

TCW follows GDPR laws and more details can be found in our GDPR Policies and amendments located on our website and our Google Teacher Drive. This ensures any updates being made to GDPR policies are not needed to be copied across to individual independent policies.

Please note that GDPR and data protection regulations do not prevent the sharing of safeguarding concerns. GDPR is based on data protection principles that our school must comply with, namely that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use.
- Papers containing confidential personal data must not be left on office and classroom desks, on staff room tables, pinned to notice/display boards, or left anywhere else where there is general access.
- Where personal information needs to be taken off site, staff must sign it in and out from the school office.
- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and students are reminded to change their passwords at regular intervals.
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices.
- Staff should only ever use TCW accounts and devices to communicate with students and their families. Staff should not store any work related information on their personal accounts or devices as this indicates a lack of professional boundaries and increases the risk of confidential data being lost or stolen.
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 6.1).

21.2. Disposal Of Records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will be disposed of securely, where we cannot or do not need to rectify or update it. For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on TCW's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

We will hold records in line with our records retention schedule. Please refer to TCW's Data Protection Policy for further details.

Figure 2: Safeguarding Data record keeping retention

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Child protection files should be passed on to any new school the child attends or retained if they leave education.	Yes		Closure + 35 years	DESTROY unless legal action is pending	
Safeguarding reports, disclosures, medical records of students	Yes		Closure + 35 years	DESTROY unless legal action is pending	

implicated.					
Safeguarding concerns involving an adult or concerns of an adult's behaviour around children	Yes		Closure + 50 years	DESTROY unless legal action is pending	If the adult is a staff worker, volunteer or contractor we retain their personnel file for the same amount of time. We will keep records for the same amount of time regardless of whether the allegations were unfounded. However, if you find that the allegations are malicious we will destroy the record immediately.

Please see our Safer Recruitment policy on record-keeping specifically with respect to recruitment and pre-employment checks.

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

22. Safeguarding Training

22.1 All Staff

All staff will receive appropriate safeguarding and child protection training at induction, including training on online safety, so that they understand TCW's safeguarding systems, their responsibilities and the signs and indicators of abuse, neglect and exploitation.

- Safeguarding and child protection training will be regularly updated. All staff will receive safeguarding and child protection updates at least annually, with additional updates provided as required through staff meetings, email briefings, bulletins, training sessions, changes to policy documents and other appropriate communication.

Additional safeguarding updates will be provided where there are:

- Changes To Legislation Or Statutory Guidance;
- Significant Changes To Local Safeguarding Arrangements;
- Emerging Safeguarding Risks;
- Learning From Safeguarding Incidents Or Reviews;
- Changes To TCW's Safeguarding Procedures;
- Changes In Technology Or Online Risks; Or
- Specific Safeguarding Issues Affecting Tcw's Students Or Staff.

Staff will be trained to recognise and respond to safeguarding concerns including, but not limited to:

- Abuse And Neglect
- Child-On-Child Abuse
- Sexual Violence And Sexual Harassment
- Domestic Abuse

- Child Criminal Exploitation And County Lines
- Child Sexual Exploitation
- Serious Violence
- Radicalisation And Extremism
- Online Harm
- Harmful Sexual Behaviour
- Honour-Based Abuse
- Female Genital Mutilation
- Forced Marriage
- Modern Slavery And Trafficking
- Safeguarding Concerns Involving Children With Send
- Safeguarding Concerns Involving Children Experiencing Mental Health Difficulties
- Safeguarding Concerns Relating To Attendance, Absence And Children Missing From Education;
- Safeguarding Concerns Relating To Alternative Provision And Disrupted Education; And
- Racism, Discrimination And Other Harmful Or Derogatory Behaviour.

All staff will be required to read and understand the relevant safeguarding information in the current version of Keeping Children Safe in Education. TCW will maintain a record confirming that staff have received and understood the required safeguarding information.

Very rarely do TCW have volunteers, but where volunteers are engaged they will receive appropriate safeguarding information and training relevant to their role. Please refer to TCW's Safer Recruitment policy.

Contractors and other individuals working regularly with students will receive appropriate safeguarding information and/or training proportionate to their role and level of contact with Students. Direct contact opportunities with Students are always minimised.

20.2 DSL and DDSL

The DSL and any deputies will undertake appropriate DSL training, including training on the role and responsibilities of the DSL, child protection, inter-agency working, information sharing and current safeguarding risks.

DSL training will be refreshed at least every two years, with the DSL and DDSLs undertaking regular additional safeguarding updates and continuous professional development between formal training courses.

The DSL and DDSLs will remain up to date with:

- Changes To Keeping Children Safe In Education;
- Working Together To Safeguard Children;
- Local Safeguarding Partnership Arrangements;
- Local Referral Thresholds And Procedures;
- Safeguarding Risks Affecting Tcw's Students;
- Online Safety, Filtering And Monitoring;
- Child-On-Child Abuse And Harmful Sexual Behaviour;
- Exploitation And Serious Violence;
- Safeguarding Children With SEND;
- Attendance And Children Missing From Education;
- Alternative Provision Safeguarding;
- Information Sharing; And
- Learning From Safeguarding Reviews And Serious Incidents.

The DSL will ensure that their safeguarding knowledge and practice is regularly reviewed and that they participate in appropriate local safeguarding partnership training and professional networks.

20.3 Trustees

- Trustees will all receive safeguarding induction and training to an appropriate Governance/Trustee level. This will include Online Safety training, covering among other things an understanding of the expectations, applicable roles, and responsibilities in relation to the filtering and monitoring systems in place at TCW.
- This training will be legislatively current, and updated every 2 years to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- Trustees will be empowered and equipped to provide strategic challenges and gain assurance that effective safeguarding arrangements are in place.

20.4 Safer Recruitment – DBS checks/interview/appointment panels

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

20.5 Staff who have contact with students and families

- All staff who have contact with young people and families will have regular contact with relevant TCW staff which will provide them with advice, support, coaching and training, to promote the interests of young people and allow for confidential discussions of sensitive issues.

20.6 Opportunities to teach young people about safeguarding

- Relevant safeguarding issues will be taught within PSHE lessons, this may be included within Relationship Education (RE) for KS1 and 2 students and Relationship and Sex Education (RSE) for KS3, 4 and 5 students.

23. Monitoring arrangements for this policy

This policy will be reviewed **annually** by the Head of Safeguarding & Wellbeing with discussion from the DSLs, DDSLs, HeadTeachers and the Executive Headteacher. At every review, it will be approved by the full board of Trustees. Additional policy reviews may be necessary due to changes in statutory guidance.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education and additional guidance noted in Legislation and statutory guidance.

Appendix 1 - Abuse

Identifying abuse

Abuse and neglect are forms of maltreatment, and different forms of abuse can overlap or occur together as well as separately. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse may be carried out by adults and other children. Children may also cause harm to other family members, often referred to as *child to parent* or *care giver abuse* if the child is a Young Carer.

TCW is aware that children can be at risk of abuse, harm and exploitation beyond the family home. Extra familial or Contextual harms include sexual exploitation, criminal exploitation, serious youth violence, and abuse that occurs separately or concurrently on digital and online platforms.

All staff, especially the DSL and DDSLs, must consider whether children are at risk of harm and exploitation in environments outside the family home. All staff should therefore apply a Contextual Safeguarding approach when safeguarding children in the setting.

Indicators of abuse: (Physical, Emotional, Neglect, Sexual)

Physical - 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 - 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Sexual - 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Most sexual abuse is committed by individuals known to the victim. Sexual abuse is not solely perpetrated by adult males. Women can

also commit acts of sexual abuse, as can other children. Sexual abuse can also occur between siblings. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it, and TCW's policy and procedures for dealing with it.

Appendix 2: Specific safeguarding issues

Adultification

Adultification is a process whereby a child and their needs are reduced or set aside because of racial bias and cultural stereotypes impacting professional judgement. Children experiencing this are incorrectly perceived as being more capable of keeping themselves safe, more aware-of and in-control of their actions than they are able to be in reality.

TCW is an anti-racist school - please refer to the Equality & Diversity policy.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of child sexual abuse. CSE occurs where an individual, group or organised network take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. This may constitute modern slavery.

It is crucial to remember that a child (i.e. a person under the age of 18) who is being exploited, has not consented to sex, regardless of their age. CSE can affect any child or young person under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. The victim may have been sexually exploited even if the sexual activity is 'legal', the child sees themselves as part of the same group, or sexual activity *appears* consensual. Some children may not realise they are being exploited, as they may believe they are in a genuine romantic relationship. An example of this would be abuse of a position of trust, such as an adult Teacher in a sexual relationship with a Student.

As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern as children should not be expected to understand the abuse they are experiencing. Prosecutions for child sexual exploitation can be brought under the provisions of the Sexual Offences Act 2003.

Children may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Apart from age, other factors that could make a child more vulnerable to exploitation include gender, sexual identity, cognitive ability, learning difficulties, communication ability, social isolation, previous experiences of abuse (e.g. LAC), physical strength, status, and access to economic or other resources. However, sexually exploited children come from a range of backgrounds, and may have no additional risk factors or vulnerabilities.

CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity, 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 technology or the internet. CSE can occur over time or be a one-off occurrence and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Staff should be vigilant and be aware of the following indicators of CSE, which is by no means an exhaustive list, and reports all concerns immediately to the DSL:

- Children Who Are In Possession Of Multiple Phones And Overly Anxious To Check Their Phones

- Children Who Experience Sudden Changes In Behaviour E.G. Looking Agitated, Children Who Want To Leave The School Premises At Lunchtime
- Children Who Have Older Boyfriends Or Girlfriends;
- Children Who Suffer From Sexually Transmitted Infections Or Become Pregnant.
- Children Who Appear With Unexplained Gifts Or New Possessions;
- Children Who Associate With Other Young People Involved In Exploitation;
- Children Who Suffer From Changes In Emotional Well-Being;
- Children Who Misuse Drugs And Alcohol;
- Children Who Go Missing For Periods Of Time Or Regularly Come Home Late; And
- Children Who Regularly Miss School Or Education Or Do Not Take Part In Education.

Students are taught about online safety as part of their PSHE programme and have further support in the teaching/mentoring process the 1:1 education we provide allows. Staff will monitor internet usage in school time. Chromebooks belonging to TCW alert staff to any sites the students access which are of a concerning nature. Where appropriate, staff will communicate with parents and carers regarding internet usage and advise on parental controls. This is discussed in more detail in our E-safety Policy.

Effective partnership working across statutory and voluntary agencies is crucially important in protecting young people at risk of or who have experienced child sexual exploitation. Much of the work will be through scheduled PSHE lessons, including our Sex and Relationship Education (SRE) work. This includes a scheme of work and workshops from Sexpression. We will also seek to tailor specific student needs when identifying risks and connecting young people with relevant partners such as WUSH (wise up to sexual health), Young Hackney, Safer London, NSPCC and others that we may deem suitable.

An important part of educating our young people is focussing on what is a healthy relationship and issues of consent. This will also target potential abusers at an early age with the intention of helping to shape their attitudes towards others.

Child Criminal Exploitation (CCE), including County Lines

Child Criminal Exploitation is where an individual, group or organised network take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual, or if they identify as part of the same group. CCE does not always involve physical contact; it can also occur through the use of technology. This may constitute modern slavery.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country through County Lines, forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to

All Staff should be aware that girls as well as boys can be at risk of CCE. It is important for staff to note that young people being criminally exploited are at higher risk of being sexually exploited.

Staff need to be aware of some of the indicators of CCE:

- children who are in possession of multiple phones and overly anxious to check their phones
- children who experience sudden changes in behaviour e.g. looking agitated, children who want to leave the school premises at lunchtime
- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines (or another form of "deal line"). This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

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

Many of the indicators of children involved in County Lines are as described above under CCE. However, in addition they can include children who:

- go missing from education and/or home and subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel rooms where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing
- are under 10 years old - and therefore under the age of criminal responsibility

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office Child exploitation disruption toolkit and The Children's Society County Lines Toolkit For Professionals

In boroughs where Exploitation Screening Tools are used, TCW will consider completing this in order to support an external referral.

Serious Violence

Serious violence is a continuing safeguarding concern and may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should be alert that risks of serious violence may increase at different points in the school day (e.g. immediately after school or when leaving, or during unsupervised breaks).

Staff should be alert to indicators that a child may be at risk of, or involved in, serious violence. Indicators may include:

- Unexplained Injuries
- Increased Or Unexplained Absence
- Significant Changes In Behaviour Or Wellbeing
- Changes In Friendships Or Relationships, Particularly With Older Individuals Or Groups
- Unexplained Gifts, Money Or New Possessions
- Involvement In Criminal Or Antisocial Behaviour
- Concerns About Weapons
- Changes In Educational Engagement Or Attainment
- Information Suggesting Involvement With Gangs, Organised Crime Groups Or County Lines.

Children who have experienced disrupted education, exclusion, alternative provision or offending may have additional risk factors, although these circumstances must never be treated as evidence that a child is involved in serious violence.

Indicators which may signal that children are at risk from, or are involved with serious violent crime 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.

Any concern that a child may be carrying, intending to carry or have access to a weapon must be reported immediately to the DSL. The DSL will assess the risk and take appropriate safeguarding action, including contacting the Police or Children's Social Care where appropriate.

With serious violence incidents or indicators, DSLs will ensure external support or referrals are made, and safety and support plans or risk assessments are fully and appropriately considered.

Online Harms

Please refer to TCW's Behaviour Policy (for Mobile Phone use) and E-Safety policy.

Children should have the right to explore the digital environment but also the right to be safe when on it. However, the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal exploitation; radicalisation; sexual predation/grooming; sharing of consensual and non-consensual nudes or semi-nudes; and forms of peer on peer abuse. Technology often provides the platform that facilitates harm.

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic or misandric messages, the non-consensual sharing of nude or semi-nudeindecent images (including in chat groups), and the sharing of abusive images and pornography (including AI generated), to those who do not want to receive such content.

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

- **Content**: being exposed to illegal, inappropriate or harmful contentmaterial; for example, pornography, fake news, racism, prejudice-based content, misogyny and misandry, extreme sexual or physical violence, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories;

- **Contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal, financial or other purposes;
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of "dick pics", nudes and semi-nudes), and/or pornography, sharing other explicit images, and online bullying, and including those generated using AI .
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. When students are at risk of phishing, schools can report concerns to the Anti-Phishing Working Group.

Mobile phones and Devices

Please refer to TCW's Behaviour Policy (for Mobile Phone use) and E-Safety policy.

TCW school sites manage student phone use through 'phone-bans' or 'positive choice' secure phone storage during the school day.

Students with tailored timetables may require phone access at different times to other Students for travel or safety reasons. This is pre-arranged and closely managed by staff responsible for the Student.

School accounts, devices, filtering and monitoring

It is essential that our students and staff are safeguarded from potentially harmful and inappropriate online material, including when they are taught remotely or offsite. We have appropriate filters in place and use the monitoring system Lightspeed to track and follow up on any concerning internet use, both when students are at school and when using their school accounts at home. When concerns are identified through these systems we intervene in, and escalate any incident where appropriate. TCW's Online Safety Team reviews the schools' online risks regularly, as well as reviewing and updating the filters to ensure they are current and effective. The Head of Safeguarding & Wellbeing will have oversight of these reviews and ensure they are logged.

Cybercrime

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

When there are concerns about a child in this area, staff should notify the DSL, who will consider referring the child into the Cyber Choices programme. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

TCW is committed to ensuring that Online Safety is a running and interrelated theme throughout its safeguarding arrangements including policy and procedure, the curriculum, staff training and induction, the role of the DSL, parental engagement, as well as PSHE.

Staff should report Online Safety concerns about students to the DSL as with all other safeguarding concerns. When it comes to the safety and well-being of the child, the response to the risks and harms that children may experience in the online or digital environment should be no different than the offline, face to face world. For most children there is little distinction between the online and face to face, physical environments, as the two intersect with one another in their daily lives. Staff should recognise that children's experience of abuse in the digital environment may be even more

pronounced, where the identity of the abuser is unknown and the abuse can continue 24 hours a day, 7 days a week.

Staff should be aware that children with known vulnerabilities such as SEND, LAC and previously LAC children and Children known to a Social Worker, may be more vulnerable to harm and exploitation in the online and digital environments.

Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse recognises that domestic abuse may occur in different types of relationships, including ex-partners and family members. Domestic Abuse may involve a range of abusive behaviours which may be a single incident or a pattern of abuse, including physical, sexual, emotional, economic, or coercive/controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards **must be aged 16 or over** and they must be "personally connected".

Staff should be aware that all children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse (including harassment and violence or stalking) is sometimes referred to as 'teenage relationship abuse'.

Operation Encompass ensures that when police are called to an incident of domestic abuse, and where there are children in the household, the police will inform the school's Designated Safeguarding Lead before the child or children arrive at school the following day. From 7.11.25, the police have a statutory duty to notify a child's educational setting when they attend a domestic abuse incident in a child's home, including children who were not physically present at the incident. The scheme recognises children as victims of domestic abuse in their own right. This duty places no new responsibilities on educational settings. The purpose of Operation Encompass is to enable schools to provide 'silent support' and is not intended to replace statutory procedures. DSLs are trained and signed-up for Operation Encompass alerts and will respond accordingly when they are received.

So-called 'honour-based' abuse

All forms of so-called Honour Based Abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of Honour Based Abuse, or already having been a victim of it. This may include FGM, virginity testing or Forced Marriage for example.

If staff have a concern regarding a child who might be at risk of Honour Based Abuse or who has suffered from Honour Based Abuse, they should speak to the Designated Safeguarding Lead, who will follow local safeguarding procedures.

Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs'. It is a form of child abuse with long-lasting harmful consequences. FGM is a criminal offence under the Female Genital Mutilation Act 2003. Further guidance on FGM is avaliable in HM Government Multi-Agency Statutory Guidance on FGM.

Whilst all staff should speak to the DSL (or DDSL) with regard to any concerns about FGM, there is a specific legal duty on teachers. 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. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** specifically, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining students. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.

The duty on teachers to report to the police does not apply in relation to at-risk or suspected cases or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures and report concerns to the Designated Safeguarding Lead, as follows:

Any non-teaching staff who discovers that an act of FGM appears to **have been carried out on a student under 18**, suspects a student is **at risk** of FGM or discovers that a **student age 18 or over** appears to have been a victim of FGM, **must** speak to the DSL and follow the safeguarding procedures of the area where the student lives.

If in doubt, staff should speak to the Designated Safeguarding Lead.

TCW aim to stop FGM occuring through prevention strategies, which include:

- Maintain a robust attendance policy that does not authorise holidays, extended or otherwise.
- Ensure that FGM training is given for Child Protection leads and disseminated training for all staff at the front line dealing with the children.
- Designated Safeguarding Lead will engage in discussions with parents/carers of children from FGM practicing communities.
- Ensure we deliver comprehensive PSHE lessons throughout the school.

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent/carer or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other young people about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social care in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

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

TCW recognises that girls at risk of FGM may not be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

To ensure that FGM is not taking place, the school may sensitively and informally ask children and their families about their planned extended holiday. Questions could include:

- Who is going on the holiday with the child?
- How long do they plan to go for and is there a special celebration planned?
- Where are they going?
- Are they aware that the school cannot keep their child on roll if they are away for a long period?
- Are they aware that FGM including Sunna is illegal in the UK even if performed abroad?

If the family is originally from a country where girls or women are circumcised and we suspect that a child is a victim of FGM we may ask the child the following:

- Do you think you have gone through this?
- Has anything been done to you down there or on your bottom?
- Do you want to talk to someone who will understand you better?
- Would you like support in contacting other agencies for support, help or advice?

Please find Government guidance on Multi-Agency working around FGM here. The document includes information about what FGM is, the laws around it and how to effectively work together to safeguard girls at risk.

Virginity Testing and Hymenoplasty

The government has made it illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK, as part of the Health and Care Act 2022. It is also illegal for UK nationals and residents to do these things outside the UK.

In response to any reports of a child/young person being subject to or at risk of virginity testing or hymenoplasty, the DSL will take action in accordance with the government's non-statutory guidance Virginity testing and hymenoplasty: multi-agency guidance (July 2022).

Forced Marriage

Forcing a person into a marriage is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014 (England and Wales). A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

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

Many young people will be living through their entire childhoods with the expectation that they will marry someone of their parents/carers or other family members choosing. What needs to be communicated to all of those at risk is that forced marriage is a **CRIME** and that they have a fundamental human right to be able to choose their future spouse.

Some of the key motives that have been identified are:

- Controlling unwanted sexuality (including perceived promiscuity, or being lesbian, gay, bisexual or transgender) - particularly the behaviour and sexuality of women
- Controlling unwanted behaviour, for example, alcohol and drug use, wearing make-up or behaving in, what is perceived to be, a "westernised manner"
- Preventing "unsuitable" relationships, e.g. outside the ethnic, cultural, religious or caste group
- Protecting "family honour" or "izzat"
- Responding to peer group or family pressure
- Attempting to strengthen family links
- Achieving financial gain
- Ensuring land, property and wealth remain within the family
- Protecting perceived cultural ideals
- Protecting perceived religious ideals which are misguided
- Ensuring care for a child or adult with special needs when parents or existing carers are unable to fulfil that role
- Assisting claims for UK residence and citizenship
- Long-standing family commitments.

TCW Staff will receive training around forced marriage and the possible presenting symptoms/indicators which can also be found below.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL. Staff are made aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer (LADO)
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student for support, such as school counselling, as appropriate

Please find more information in guidance on Forced Marriage (June 2022) here.

Radicalisation, Extremism and Prevent Duty

Please refer to our Behaviour and Conduct Policy for students and for staff the Disciplinary Policy, Code of Conduct as well as TCW's Equality and Diversity Policy.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their training and professional judgement in identifying children who might be at risk of radicalisation and act proportionately. It is worth noting that the radicalisation risks facing children may vary over TCW's geographic sites.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This can happen in-person and/or online.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Staff will be trained annually around Prevent. TCW will promote fundamental British values through our PSHE curriculum, and enable open student discussions around religion, ethnicity and culture.

TCW will work with local authorities to complete and review our Prevent risk assessment and checklist as an ongoing commitment to our Prevent duty. More information about schools' Prevent duty under the Counter-Terrorism and Security Act 2015 can be found here (paragraphs 141-207 pertain to Education). Additional information can also be found in this Prevent duties in Education document. DSLs can consult KCSIE that has additional links to more specific support.

All Prevent referrals will be made through the child's local authority Channel panel (a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism), and TCW will work in partnership with these agencies to address these concerns. DSLs will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving to enable full support.

Child on Child Abuse - including harassment and violence (prev known as Peer on Peer Abuse)

Staff must be aware that children may be harmed by other children. Child on child Abuse can happen both inside and outside of school including online. It is important that all staff recognise the indicators and signs of child on child abuse.

Staff should treat all reports of child on child abuse very seriously and make it clear that all forms are unacceptable as it is an infringement of a child's human rights. Abuse is abuse, and will never be dismissed as 'banter' or 'part of growing up'. Importantly, **child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator.**

All staff should recognise that even if there are no reported cases of child on child abuse among students, such abuse may still be taking place and it is simply not being reported.

Staff should be aware that it is more likely that boys will be perpetrators of child on child abuse and girls will be victims of child on child abuse. However, all forms of child on child abuse are unacceptable and will not be tolerated at TCW.

Staff should recognise that child on child abuse can take many forms and may be facilitated by technology, including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying, misogyny/misandry)
- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour and sexual abuse including inappropriate sexual language, touching, sexual assault or rape
- 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
- teenage relationship abuse – where there is a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- upskirting – taking a picture under a person's clothing without their knowledge and/or permission with the attention of viewing their buttocks or genitals (with or without underwear) to obtain sexual gratification. It is a criminal offence.
- initiation/hazing - used to introduce newcomers into an organisation or group by subjecting them to a series of trials and challenges, which are potentially humiliating, embarrassing or abusive.
- prejudice and discrimination - behaviours which cause a person to feel powerless, worthless or excluded originating from prejudices around belonging, identity and equality, misogyny or misandry - for example, prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. However, these more common examples do not mean that the reverse is not possible.

Although a child identifying as LGBTQ+ is not a safeguarding concern in itself, these children may be more vulnerable to forms of child-on-child abuse (including harassment and violence). This includes children who are perceived to be LGBTQ+ even though they do not identify as such. TCW is committed to providing a safe space for LGBTQ+ children to share any concerns they may have and in ensuring an inclusive culture is maintained.

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

- You must tell the DSL and record the allegation, but do not investigate it yourself
- The DSL will contact the children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all young people involved – child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator - including the victim(s) and the child(ren) against whom the allegation has been made, or any others affected – including a named 'go-to' person they can talk to if needed

- Records of actions undertaken will be maintained on MyConcern (using the updates function). If this is not appropriate, a confidential folder will be made and updated by the DSL.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour, including incidents of misogyny/misandry
- Acknowledging and acting on the fact that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent. Students will follow tailored PSHE schemes of work that aim to equip them with the key skills to deal with difficult situations independently
- Ensuring students know they can talk to staff confidentially by providing them with a student safeguarding policy, discussing at their initial meeting about communicating safeguarding concerns with their teacher and confirming that teachers need to discuss with the DSL disclosures, allegations and safeguarding concerns
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy

Child on Child Sexual Violence and Sexual Harassment

All staff must be aware that sexual violence and sexual harassment can occur between two children of any age and gender, in any environment, including schools and online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The abuse may be perpetrated by a younger child towards an older child because of an imbalance of power caused by factors such as height difference or cognitive ability. Staff should be mindful that sibling-on-sibling sexual abuse also occurs, and new evidence from 2022 suggests that this could be more common than previously thought, and may make up as much as a quarter of all sexual abuse reports to the police.

As part of TCW's wider safeguarding culture, staff should maintain a 'it could happen here' approach in regard to child on child sexual violence or sexual harassment and understand that children may be experiencing such forms of child on child abuse, including that facilitated by technology, regardless of the number of reports the DSL receives.

In response to reports including disclosures we will reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Further assurances should include that the law is there to protect victims, not criminalise them.

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

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours will help to normalise them.
- recognising child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, and supporting all parties appropriately.
- awareness that apparently lower-level incidents may sit within wider patterns of harm, coercion, exploitation or peer culture.

Sexual violence offences are defined under the Sexual Offences Act 2003 as:

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

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

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

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

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

All Staff need to be aware of the following:

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

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. In parallel to this the school will make a referral to Children's Social Care.

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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 may include the following:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (we will consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence such as:
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos

- sharing of unwanted explicit content;
- upskirting
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation, coercion and threats

When there has been a report of sexual violence, the DSL or a DDSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment will consider the:

- victim
- alleged perpetrator
- other children and, if appropriate, staff

Risk assessments will be recorded electronically, and kept under review. The DSL or a DDSL will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident(s), including considering whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children, for example if the alleged perpetrator is significantly older
- if the alleged incident is an isolated incident or a sustained pattern of abuse.

The starting point regarding any report will always be that sexual violence and sexual harassment are not acceptable and will not be tolerated at TCW.

Additional consideration will be given to:

- the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any young person will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them
- the proportionality of the response. Support and sanctions should be considered on a case-by-case basis.

Harmful Sexual Behaviours (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children. The DSL will consider developmental differences and potential susceptibilities of individuals involved in HSB.

HSB can occur online or face-to-face (both physically and verbally) and is never acceptable as this can cause developmental damage. HSB's can occur between two or more children, or through a group

of children towards a single child, or towards another group of children. HSB can involve any age and sex children, and in some cases, it can progress on a continuum all the way to sexual violence.

It is therefore important for all staff to address harmful or inappropriate sexual behaviours to help prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma.

TCW takes seriously its duty to respond appropriately to all reports and concerns about children's sexual behaviours both online and offline, in and outside of the school, including reports of sexual violence and/or sexual harassment. The DSL has completed relevant training in responding to and managing harmful sexual behaviours and will draw upon appropriate resources such as the Brook Traffic Light Tool or AIM Checklists and Assessment Tools. The DSL will liaise where appropriate with Children's Services, the Police and other specialist services.

If a student makes an allegation of harmful sexual behaviour:

- You must tell the DSL and record the allegation, but do not investigate the situation more widely yourself.
- The DSL will contact the children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all young people involved – including the victim(s) and the child(ren) against whom the allegation has been made, or any others affected – including a named 'go-to' person they can talk to if needed.
- Records of all allegations and actions undertaken will be maintained on MyConcern (using the updates function). If this is not appropriate, a confidential folder will be made and updated by the DSL.
- The DSL will consider support options for all parties involved or affected, including contacting the children and adolescent mental health services (CAMHS) if appropriate.

Sexual Imagery: **consensual or non-consensual making and/or sharing of nudes or semi-nudes**

Consensual and non-consensual making or sharing of nudes and semi-nudes are some of the terms professionals use to describe the sending or posting of nude or semi-nude images, videos or live streams by children and young people under the age of 18 online. The term 'images' includes all visual content, such as photographs, AI generated content, videos and livestreams. The term 'nudes' is used by young people and covers all types of image sharing incidents. Alternative terms used by children include 'dick pics' or 'pics'.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Nude or semi-nude images, videos or live streams may include more than one child or young person, and they may be self-generated, or taken by another person, or artificially generated using AI.

Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online, often using AI, sometimes described as 'deepfakes' or 'deep nudes'.
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely (without consent) to publicly shame. Such images can be shared via web pages and social media accounts called 'Bait Out' pages/accounts.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal.

When handling disclosures of consensual and non-consensual making or sharing of nudes and semi-nudes staff must be aware that **it is illegal for staff to view or share such imagery**. Staff should immediately report the disclosure to the DSL.

In line with UKCIS's guidance, *Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People 2020 (updated March 2024)*, we will respond to all incidents of consensual and non-consensual making or sharing of nudes and semi-nudes as follows:

- All disclosures must be reported to the DSL as soon as possible
- The DSL will hold an initial review meeting with appropriate staff
- Subsequent interviews with the young person/s involved will be held (if appropriate)
- All incidents involving the sharing of nude or semi-nude images will receive a safeguarding response, whether or not the sharing appears consensual or non-consensual.
- Parents/carers are informed at an early stage and involved in the process in order to best support the child or young person (unless there is good reason to believe that involving them would put the young person at risk of harm)
- A referral will be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

The guidance also outlines how to support students involved and how to educate young people around these issues. At TCW, students would generally be taught about consensual and non-consensual making or sharing of nudes and semi-nudes through our PSHE curriculum. Students requiring more specific support and education, could access this through 1-1 Personal Development or School Counselling sessions.

Bullying

Please refer to TCW's Behaviour Policy and E-Safety policy.

Bullying is a very serious issue that can cause anxiety and distress. All incidents of bullying including cyber-bullying and prejudice-based bullying should be reported and will be managed through our Anti-Bullying and Behaviour Policies in accordance with *Keeping Children Safe in Education 2026* and *Behaviour in Schools, Advice for Head teacher and School Staff (September 2022)*.

Our Anti-Bullying policy states that everyone has a right to feel secure at TCW. It outlines staff procedures around bullying, as well as advice for students about how to access support in and outside of school.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children, 5-11-year-olds and 12-17 year-olds. The guides explain each step of the process, support and special measures that are available.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families, and be hard for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent/carer sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information

designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and DDSL are aware of contact details and referral routes into the Local Housing Authorities so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases we would be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17 year olds could be living independently from their parent/carer(s), for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the DSL and DDSL will ensure appropriate referrals are made based on the child's circumstances.

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a close relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. When the arrangements come to the attention of TCW (and we are not involved in the arrangements), we will notify the local authority to allow them to ensure the arrangement is suitable and safe for the child.

If we were involved, directly or indirectly, in arranging for a child to be fostered privately we would notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications would contain information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and would be made in writing as required.

Young Carers

A young carer is a person aged 18 or under who cares, unpaid, for a friend or family member. This can include, but is not limited to a person with:

- a long-term illness or condition
- a physical or learning disability
- a substance misuse problem
- a mental health problem

The support provided by a child can vary based on the condition of the person they are caring for, but typically young carers provide a combination or personal (such as helping to dress or bath them), practical (such as cooking, cleaning and shopping) and emotional care (such as talking through their concerns with them).

It is estimated by the Children's Society that 1 in 5 children are young carers and many are hidden and unidentified. TCW recognises that Young carers have the right to an assessment by the local authority to identify needs and support and the person they are caring for can have a reassessment of their needs. The DSL will seek information and support from the local Young Carers Program when identifying young carers and refer accordingly.

Child abduction and Community Safety Incidents

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

All incidents of Child Abduction should be reported immediately to the Police and Children's Social Care.

Other community safety incidents in the vicinity of a school can raise concerns amongst staff, children and parents/carers, for example, people loitering nearby or unknown adults engaging children in conversation. All incidents that occur during the school day should be immediately reported to the DSL, and steps taken to ensure the safety and well-being of the children involved.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, criminal exploitation, forced labour, slavery, servitude, or the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism (NRM) is available in the Modern Slavery Statutory Guidance. Please note Schools cannot refer to the NRM.

Appendix 3: Allegations of abuse made against staff (or anyone working for TCW)

Please refer to TCW's Dealing with Allegations policy.

This section of the policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

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

It applies regardless of whether the allegation relates to the personal or professional life of the staff member/volunteer.

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

In all cases of such allegations being made, we will contact the Local Authority Designated Officer (LADO) of the local authority of the school where the staff member is based, regardless of whether the student making the allegation resides there, as soon as possible.

East School: Tower Hamlets LADO: 020 7364 0677 / LADO@towerhamlets.gov.uk.

South School: Southwark LADO - 020 7525 0689 / 07943 076608 / Eva.Simcock@southwark.gov.uk.

(If unavailable, call Quality Assurance Service: 020 7525 3297 / Qau.Safeguarding@southwark.gov.uk)

Allegations against ex-TCW Staff or historical allegations of abuse will also be referred to the LADO, or alternatively the police if a crime is alleged to have taken place.

Procedure for dealing with allegations

In the event of an allegation that any current staff has acted in any of the ways detailed above, this should immediately be reported to the Headteacher of that school:

East School: Dean Phillips Smith / 02073770280 Ext 604 / dean.phillips-smith@tcw.org.uk

South School: Andy Davies / 02073770280 Ext. 634 / andy.davies@tcw.org.uk

In the event of an allegation that any of the Central office team have acted in any of the ways detailed above, this should immediately be reported to

Director of Operations: Amy Jones / 02073770280 Ext 665 / amy.jones@tcw.org.uk

In the event of an allegation that a Headteacher or any of TCW's Central executive team have acted in any of the ways detailed above, this should immediately be reported to

Executive Headteacher: Adam Dalton / 02073770280 Ext 601 / adam.dalton@tcw.org.uk

If the Executive Headteacher or CEO is the subject of the allegation, it should be reported to the Chair of Trustees. The Trustee for safeguarding would be the investigating case manager.

The person receiving news of the allegation (as outlined above) will act as the case manager and take the following steps:

- Try to establish the practical details of the time/s, date/s and location/s of the alleged abuse, as well as the name of potential witnesses. Please note that these initial inquiries are not carried out in

order to establish guilt or innocence and the case manager will not interview victims, witnesses or the person/s that the allegation is in relation to

- Report and discuss the allegation with the LADO as soon as possible and no later than within 1 working day of the allegation being made. The LADO will make referrals to the Multi Agency Safeguarding Hub (MASH) as needed. If it is not possible to contact the LADO, the case manager should contact MASH directly. However, if the accused individual is deemed to be an immediate risk to young people or there is evidence of a possible criminal offence, the case manager may consider it necessary to involve the police *before* consulting the LADO. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police
- Consider as part of the initial discussion with the LADO, who should notify the parents/carers of the young person who has allegedly been abused, of the allegation and how this should be done. As part of informing parents/carers, they will also be advised regarding the requirement to maintain confidentiality about any allegations made against staff while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice
- If it is agreed with the LADO (and with the police and children's social care where necessary) that the accused individual can be informed of the allegation, this should be done as soon as possible. The case manager will only share such information with the individual as has been agreed with those mentioned above
- Ensure that TCW is represented at the Multi-agency Allegation against Staff and Volunteers meeting if such a meeting is convened by the LADO
- Carefully consider whether suspension of the individual from contact with young people at TCW is justified. Depending on the nature of the allegation, and if the LADO (and police and/or children's social care services where appropriate) have no objections to the accused individual continuing to work during the investigation, alternative arrangements can be put in place
- If immediate suspension is considered necessary, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, agree and record the justification for this with the LADO. Agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate
- Keep the parents or carers informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that has harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible, the Headteacher/Chair of Trustees will ask the police at the start of the investigation to obtain consent from the individuals involved to share their

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

Suspension of Staff facing allegations

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

- An employee may be suspended from duty on full pay at any time in cases of gross misconduct or where there is a risk to the safety of colleagues, students or to the employee themselves, or a risk to the contamination of evidence. Suspension is not a disciplinary penalty and is a neutral act. Suspension will not be automatic and consideration will be given to alternatives to remove an individual from the workplace.
- In some cases, it may be appropriate for the employee to take a short period of leave on full pay (i.e. being asked to remain at home with no work having been allocated). Any period of such leave will not be recorded on file as part of any disciplinary record. This may include prior to an investigatory interview being held. In such cases, the company will normally seek advice from the HR Employee Relations team. It is important to understand that this type of leave and suspension from duty are not disciplinary sanctions.
- The decision to suspend will normally be made following advice provided by the HR Employee Relations team. This decision will be made at the outset, either as a result of the initial exploratory interview, during or following the formal investigation.
- Staff will be notified in writing of any decision to suspend and should be advised to contact their Trade Union representative and be provided with the contact details for a link member of staff to keep in contact throughout. The formal letter of suspension should be handed to the employee or sent by Recorded Delivery, to ensure proof of receipt.
- In cases where it is known that the employee holds similar or equivalent employment(s) with other companies, consideration should be given as to whether the suspension from duty should be extended, for example, when dealing with matters raised under the Dealing with Allegations policy. In such cases, advice should be sought from the HR Employee Relations Team.
- Where suspension relates to a safeguarding allegation, the guidance in the Dealing with Allegations Policy must take precedence over this policy and procedure.
- Only the CEO may end a period of suspension following advice from the Headteacher and Human Resources.

Allegations against Agency Staff

If an allegation is made against supply staff who is not employed by TCW, but provided through an agency, we will ensure that the allegation is dealt with properly.

We won't decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Trustees will discuss with the agency whether it's appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the investigation is carried out. We would expect the Agency to be fully involved and co-operate in any enquiries, but would usually take the lead as the agency wouldn't be able to collect the necessary information. Issues such as information sharing will be addressed in an allegations management meeting to ensure previous concerns or allegations known to the agency are taken into account.

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

Definitions for outcomes of allegation investigations

The following definitions should be used when determining the outcome of investigations of allegations:

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

Investigation Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will take appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the LADO whether to make a referral to

a) the DBS for consideration of inclusion on the barred list, and
b) the appropriate regulatory agency, for example, if the individual concerned is a teacher, the NCTL to consider prohibiting the individual from teaching

It is a legal requirement to make a referral to the DBS if the school believes that the individual concerned has engaged in conduct that has harmed, or is likely to harm, a young person (including inappropriate sexual conduct), or if the person otherwise poses a risk of harm to a young person.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

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

False or malicious allegations

If an allegation is shown to be false or malicious, the case manager will inform the individual concerned, orally and in writing, that no further action will be taken under disciplinary or child protection procedures. Appropriate support should be offered. Consideration should be given to the possibility that the young person who made the allegation may be experiencing abuse elsewhere.

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

New information

If any new information emerges after the conclusion of a case, which is relevant to the case or its outcome, we will contact the LADO without delay.

Confidentiality

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

The case manager will take advice from the LADO, as well as police and children's social care services as appropriate, to agree:

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

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of actions taken, decisions reached and the justification for these

Unless an allegation or concern is found to have been false, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

A more detailed account of actions the school and LADO will take to deal with allegations of abuse against staff can be found in Keeping Children Safe in Education 2026 and the Tower Hamlets or

Southwark Safeguarding Children Partnership's LADO Procedures and Flowchart re Allegations made against staff working in the children's workforce and Supplementary guidance for schools and education settings on managing allegations of abuse against staff members.

Policy Review log

Policy	Safeguarding Policy
Date of Approval	August 2020
Approved by	Adam Dalton
Review 1:	August 2021
Approved by:	Adam Dalton
Summary of Additions/Changes	Low Level Concerns about staff: Updated to log all concerns, not just allegations meeting harm thresholds. Vulnerable Groups Update: LGBTQ+ considerations.
Review 2:	August 2022
Approved by:	Adam Dalton
Summary of Additions/Changes:	Terminology update “nudes and semi-nudes” Terminology update to “child-on-child” Virginity testing & hymenoplasty included within Safeguarding Concerns.
Review 3:	August 2023
Approved by:	Adam Dalton
Summary of Additions/Changes:	Included Filtering and monitoring systems within Online Safety. Adultification included within Safeguarding Concerns
Review 4:	August 2024
Approved by:	Adam Dalton
	More explicit reference to AI, image sharing, and evolving harms within Online Safety.
Review 5:	August 2025
Approved by:	Adam Dalton
Summary of Additions/Changes:	Included statements around absence treated more clearly as a safeguarding indicator. New online safety risks added - Misinformation Disinformation Conspiracy theories. Included reference to Staff awareness of AI-related safeguarding concerns
Date of Approval	August 2026

Approved by	Amy Jones
Summary of Additions/Changes:	**Section 4. Legislation and statutory guidance updated:** TCW will update its safeguarding arrangements when legislation, statutory guidance or local safeguarding procedures change. **Section 4.1: Safeguarding Children Partnership Guidance:** Local safeguarding arrangements have been reviewed and updated **Section 5 Definitions:** The definition of Student has been expanded to include children under 18 and adult students aged 18 and over **Section 6 Roles and Responsibilities:** This section has been strengthened - explicit requirement that staff must not assume someone else will act, wait for further evidence or attempt to investigate a concern themselves before reporting it. **Section 6.2 – Designated Safeguarding Leads (DSLs):** Section has been expanded. **Section 6.3 – Deputy Designated Safeguarding Lead (DDSL) and DSL Cover:** Section has been expanded to reflect the new DDSL role in the East School. **Section 6.4 – Trustees:** Section has been expanded, Trustee responsibilities have been strengthened, **Section 7 – Equality Statement: Children who may potentially be at more risk of harm:** The list of children who may be more vulnerable to safeguarding risks has been reviewed and expanded. **Section 7.1 – Children in need of Early Help:** The terminology and processes have been updated to reflect Family Help, Universal Services and Community-based Services, with clearer expectations around identifying emerging needs, referrals, consent and recording. **Section 8 – Post 18 Students and Safeguarding:** Safeguarding arrangements for adult students have been strengthened. **Section 9 – Contextual Safeguarding (including Extra-Familial Harm):** Recognising that students may experience harm outside of the family home. **Sections 9.1–9.4 – Contextual Safeguarding:** New procedures have been introduced. **Section 11 – Confidentiality:** Information-sharing arrangements have been strengthened. **Section 12 – Voice of the Child:** The importance of children's wishes, feelings and participation in safeguarding decision-making has been strengthened within the policy. **Section 13 – TCW Safeguarding Procedures:** Recognising Abuse and Taking Action: Safeguarding procedures have been reviewed and strengthened.

	Section 13.1 – Racism, Discrimination and Derogatory Behaviour: A new dedicated safeguarding section has been introduced addressing racism, discrimination and harmful or derogatory behaviour. **Section 14 – After You Have Reported a Safeguarding Concern:** Procedures have been reviewed to provide greater clarity about what staff should do following a report and the ongoing role of the safeguarding team. **Section 17 – Digital Capture, Mobile Phones and Photo Consent:** The previous mobile phone/photo section has been expanded. **Section 18 – Reporting Allegations Against Staff & Concerns That Do Not Meet the Harm Threshold:** Procedures have been strengthened and terminology clarified around **Allegations of Harm, Concerns That Do Not Meet the Harm Threshold.** **Section 19 – Complaints and Concerns About School Safeguarding Practices:** The complaints section has been reviewed and clarified. **Section 20 – Escalation Procedures:** Escalation arrangements have been reviewed to clarify how safeguarding concerns should be progressed where staff are dissatisfied with the response or believe further action is required. **Section 21 – Record-Keeping in Safeguarding:** Record-keeping arrangements have been reviewed and strengthened. **Section 22 – Safeguarding Training:** The safeguarding training section has been substantially expanded. **Section 22.1 – All Staff:** Staff training requirements have been expanded. **Section 22.2 – DSL and DDSL:** DSL/DDSL training requirements have been clarified. **Section 22.3 – Trustees:** Trustee safeguarding training and oversight requirements have been strengthened. **Section 22.4 – Safer Recruitment – DBS checks/interview/appointment panels:** Safer recruitment expectations have been reviewed and clarified **Section 22.5 – Staff who have contact with students and families:** Expectations around safeguarding responsibilities for staff with direct contact with students and families have been reviewed and strengthened. **Section 22.6 – Opportunities to teach young people about safeguarding:** The policy continues to emphasise the role of education in helping young people understand safeguarding risks and how to seek help. **Section 23 – Monitoring Arrangements for this Policy:** Monitoring and governance arrangements have been strengthened.

	Appendix 2 – Specific Safeguarding Issues: The specific safeguarding issues section has been reviewed and updated. **Appendix 3 – Allegations of Abuse Made Against Staff:** The procedures have been reviewed and expanded.
Date of Approval:	October 2026
Approved by:	Amy Jones
Summary of Additions/Changes:	Insertion of Section 7.7 Gender Question Framework published in KCSIE 2026