



The Complete Works Policies

Child Protection and Safeguarding Policy and Procedures

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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 when determining 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 the whole school approach to safeguarding.

2. Purpose of TCW’s Safeguarding Policy

- 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.

Links with other TCW policies		
This policy links to the following policies and procedures on the TCW website:		
Anti- Bullying/ Cyber-Bullying Attendance Behaviour and Conduct British Values Compliments, Comments and Complaints Data Protection inc privacy notice	Dealing with Allegations Drug Awareness E-Safety Equality and Diversity First aid and Medication Health and Safety Lone Worker	PSHE- to include RE and RSE Risk Assessment Special Education Needs and Disability Spiritual, Moral and Social Education Student Friendly Safeguarding Whistleblowing

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and the [Governance Handbook](#). 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:

- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2018 (Updated December 2020)
- What to do if you're worried a child is being abused 2015
- UKCIS Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (December 2020)
- 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)
- London Child Protection Procedures revised 6th Edition (London Safeguarding Children Board, March 2021)
- [Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018](#)
- [When to call police guidance for schools and colleges](#)

3.1. Safeguarding Children Partnership supplementary 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.

As a school, TCW has been named as a 'relevant agency' and as such is under a statutory duty to cooperate with these arrangements.

We will engage with the boroughs' Designated Safeguarding Lead Forums, cooperate with all processes as needed (including Safeguarding Audits) 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](#)

4. Definitions

Safeguarding and promoting the welfare of children is:

- protecting children from maltreatment
- 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.

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

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

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.

5. 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 that have been risk assessed.

5.1. All staff

- 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 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 have a responsibility to report safeguarding concerns immediately to the DSL. **We would expect that this would be within 1 hour of the event, and with all concerns written up and added to MyConcern before the end of that same day.**
- Staff can call the DSL for advice, or add their concerns straight to MyConcern directly. If the concern requires immediate action, it is helpful to 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.

All staff will read and confirm that they understand:

- Part 1 (including Annex A) of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Our systems which support safeguarding, including the staff policies (including code of conduct, behaviour policy, social networking policy, mobile phone usage policy, whistleblowing policy), safeguarding team roles, and the safeguarding response to young people who go missing from education
- The early help process (sometimes known as the Common Assessment Framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as Peer on Peer abuse, 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

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

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

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.

5.2. The Designated Safeguarding Lead (DSL)

Our DSL is Lotta Jones, Designated Safeguarding Lead. The Designated Safeguarding Lead takes the ultimate lead responsibility for safeguarding arrangements within TCW on a day-to-day basis. The DSL can be contacted on 020 7377 0280 ext 606 or lotta.jones@tcw.org.uk

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

If the concern is immediate, please call the emergency services on 999, or if you want to make a referral to social care, use the number/s below for the borough where the young person lives. You will be able to discuss your concern with a social worker.

- City of London and Hackney 020 8356 5500
- Haringey 020 8489 4470
- Islington 020 7527 74 00
- Lewisham 020 8314 6660
- Southwark 020 7525 1921
- Tower Hamlets 020 7364 5601 / 5606

When the DSL is absent, Ross Adams, Head of Safeguarding & Wellbeing takes the role of Deputy Designated Safeguarding Lead (DDSL). Ross can be contacted on 020 7377 0280 ext 667 or ross.adams@tcw.org.uk.

If the DSL and DDSL are not available, Adam Dalton, Headteacher, will act as cover. The out of hours Safeguarding Lead is Adam Dalton, Headteacher. Adam can be contacted on 020 7377 0280 ext 601 or adam.dalton@tcw.org.uk.

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 young people
- Refer suspected cases, as appropriate, to the relevant body (children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- 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
- supporting 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 with safeguarding partners, case managers and designated officers for child protection concerns as appropriate.

5.3. The Trustees

The Trustees have the strategic leadership responsibility for safeguarding arrangements at TCW. As a collective body it 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.

Reji Vettasseri is the Chair of Trustees. Sue Clark takes leadership responsibility for safeguarding at TCW. She will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher or CEO (see appendix 3). She can be contacted on 0207 377 0280. Alternative contact details can be requested via chrissie.roberts@tcw.org.uk.

5.4. The Headteacher

The Head Teacher 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
- 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)

5.5. Dual role main institutions

The safeguarding responsibility for dual role students falls to the main school. When working with dual role 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. 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.

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

- 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.



- 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)
- has a mental health need
- is a young carer
- 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 exploitation
- is at risk of being radicalised or exploited
- has experienced discrimination due to their race, ethnicity, religion, gender identification or sexuality. The Complete Works understands that being trans is not a safeguarding issue and we have a commitment to not 'outing trans members of the community without their permission unless there are safeguarding reasons for doing so.
- has challenging family circumstances such as drug and alcohol misuse, living in temporary accommodation, adult mental health issues or witnessing domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day.

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.

6.1. 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.

Contact with other professionals, such as Social Workers, will be done by TCW office staff or onsite leads. 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.

6.2. Children requiring mental health support

All staff have an important role in supporting the mental wellbeing of children and to identify 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. 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 only appropriately trained professionals should attempt to make a diagnosis of a mental health difficulty.

All Staff and Students are informed about their access to TCW's Counselling Team (who are both registered with the British Association for Counselling and Psychotherapy). Students and Staff can self-refer for support or counselling by contacting the Counselling team directly:

Nikita Virk (nikita.virk@tcw.org.uk 07483 093 620)

Stuart Davenport (stuart.davenport@tcw.org.uk 07483 093 622)

Whilst anyone can refer a Student for support or counselling by contacting the Counselling Team directly (who will then contact the Student), it is important to note that this offer of support is *always* optional for the Student.

Ross Adams, Head of Safeguarding and Wellbeing is the schools' Mental Health Lead, and manages the Counselling Team: ross.adams@tcw.org.uk 07485 304 380. Amy Jones, Assistant Head, line manages this role: amy.jones@tcw.org.uk 07485 304 378.

6.3. 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 vulnerability.

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.

The Designated Teacher is Ross Adams (ross.adams@tcw.org.uk 07485 304 380) who works with the Education Support Officers and Teaching & Learning team to consider and promote the individual educational outcomes of Looked After Children and Care Leavers, and how TCW can meet these. This includes working closely with Virtual Schools, and staff being aware of the special attention required for this particular group.

6.4. Students with special educational needs and disabilities (SEND)

Children with special educational needs and disabilities (SEND) 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 SEN 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;
- children not understanding that what is happening to them is abuse;
- communication barriers when reporting abuse and difficulties in overcoming these barriers.

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)*, but staff should speak with the DSL and SENDCO 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 physical health conditions, and 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 with experience of each student. Students can also share preferences with their Teachers.

Any student can contact the DSL, Counselling and Curriculum teams, and Headteacher at a jointly managed, open 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.

6.5. Children Missing Education and Children Missing

TCW closely monitors attendance, absence and exclusions. A child going missing from education is a potential indicator of abuse and neglect, including child sexual abuse, child sexual exploitation, child criminal exploitation or mental health problems. 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.

We follow up on absences as part of our safeguarding duty. Staff must be alert to signs of children at risk of travelling to conflict zones, and places where female genital mutilation and forced marriage are prevalent.

Details of TCW's protocol and procedures for absence and attendance can be found in the [Attendance Policy on the TCW website](#).

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

7. Confidentiality

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, as [safeguarding and protecting children provides a legal basis for sharing information](#). Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Staff should never assume a colleague or another professional will take action and share information that might be critical in keeping children safe - they should take action and not rely on others. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Serious Case Reviews have highlighted failures in safeguarding systems in which people did not share information at the earliest opportunity or did not share at all, and this has resulted in preventable and serious harms to children. If in any doubt about sharing information, staff should speak to the DSL or DDSL.

All staff should understand that safeguarding requires a high level of confidentiality. Staff should only discuss concerns with the DSL or DDSL in the first instance - however the headteacher and SLT are also qualified to do this.

Any member of staff can contact children's social care if they are concerned about a child, but should inform the DSL as soon as possible that they have done so.

The DSL will have due regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR) to ensure that personal information is processed fairly and lawfully and they will adhere to the [seven golden rules for sharing information](#). Information sharing will take place in a timely and secure manner.

Wherever appropriate, TCW will seek consent from an adult with parental responsibility to share information we hold on students. However, if we believe that notifying the parents would increase the risk to the child, we will discuss the lack of consent and reasons for this with the children's social care team.

When it is not possible to gain consent (through lack of response from parents), only the relevant information will be shared, and only with the required professionals to ensure that the student is safe and well.

Information sharing decisions will be recorded, whether or not the decision to share has been taken. Child protection information will be stored securely separate from the student's school file. Child protection information is stored and handled in line with our Data Protection policy.

8. Voice of the child

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.

All TCW students have their own 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.

9. Visitors and External Speakers

If a staff member would like to invite a visitor/speaker/workshop leader, they must first inform the HR Co-ordinator, Amrit Claire, and the DSL. All potential speakers or workshop leaders must ensure that our reference forms are completed and returned, and provide a lesson plan/scheme of work for any session/s they will carry out with students. We also carry out the appropriate checks, such as Barred List and DBS information, to ensure that any individual or organisation engaging with our students will not put them at risk of harm. Any necessary information will be added to the Single Central Record. We will not invite into the school any speaker who is known to disseminate extremist views or to seek to radicalise others.

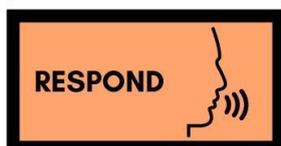
All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. All visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's lanyard, which details school expectations and safeguarding information on the back of the card. These expectations can be found in the document 'visitor expectations'. All visitors to our setting, including visiting speakers and workshop leaders, will be accompanied by a member of staff at all times.

We have exclusive use of all of our premises, but were any individuals or organisations to use these in future, the appropriate checks would be made to ensure they were not seeking to disseminate extremist views or seek to radicalise students or staff.

10. Recognising abuse and taking action / TCW Safeguarding Procedures

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





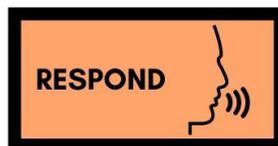
Staff should use their knowledge and understanding from Safeguarding Training, information from Student folders, MyConcern and relevant TCW policies to IDENTIFY actual harm (i.e. mistreatment) or potential harm (i.e. symptoms or signs). All staff should be aware that safeguarding applies to everyone, 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 behaviours. Any or all of these things can give rise to a concern.

If ever you are unsure, contact the DSL - we welcome questions - and it is always better to be cautious.

Do not discuss your concerns with the family until you have consulted with the DSL.

Once identified, it is vital that you act quickly on your concern.



If a child discloses a safeguarding issue to you, you should RESPOND in the following way:

- Listen to and believe them.
- Stay calm and do not show that you are shocked or upset.
- Allow them time to talk freely and do not ask leading questions. Asking questions at this point could damage the viability of the child to be interviewed and give evidence later.
- Tell the child they have done the right thing in telling you. Never tell them they should have told you sooner
- Explain what will happen next - that you will have to pass this information on. Never promise to keep it a secret
- 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, mentioning that it was described as a 'joke'.
- Do **not** discuss your concerns with anyone else until you have consulted with the DSL.



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 **dial 999** and report this to the Police, Ambulance or Fire services as appropriate.

When 'actual' or 'potential' harm is identified, staff should discuss their concerns with the DSL (see section 5.2), Lotta Jones. Lotta can be contacted on 020 7377 0280 ext 606 or lotta.jones@tcw.org.uk.

If the DSL is not available, speak with the DDSL, Ross Adams, on 020 7377 0280 ext 667 or ross.adams@tcw.org.uk. Lotta's phone will automatically be redirected to Ross if Lotta is on another call. Whilst it is not expected that any back-up support should be required, Staff 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.

It is important to note that [anyone can make a referral](#). If you 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) <http://www.chscb.org.uk>

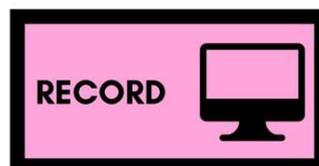
[Haringey](https://haringeyscp.org.uk/) <https://haringeyscp.org.uk/>

[Islington](https://www.islingtonscb.org.uk/Pages/default.aspx) <https://www.islingtonscb.org.uk/Pages/default.aspx>

[Lewisham](https://www.safeguardinglewisham.org.uk/lscp) <https://www.safeguardinglewisham.org.uk/lscp>

[Southwark](https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/) <https://safeguarding.southwark.gov.uk/southwark-safeguarding-board/sscp/>

[Tower Hamlets](http://www.childrenandfamiliestrust.co.uk/the-lscb/) <http://www.childrenandfamiliestrust.co.uk/the-lscb/>



Staff should use the MyConcern reporting system to report all safeguarding incidents.

Staff can write a concern for ANY student, or multiple students involved in the same incident.

MyConcern can be accessed by any member of staff using <https://www.myconcern.education/Account/Login>.

Please note that you will require your work mobile and the MyConcern app installed to verify your identity before logging in. You can also submit a concern via the MyConcern app. It is recommended that you update the app regularly.

All staff receive training on how to use the software, when and how to use a body map and how to write reports.

After you have reported a safeguarding concern

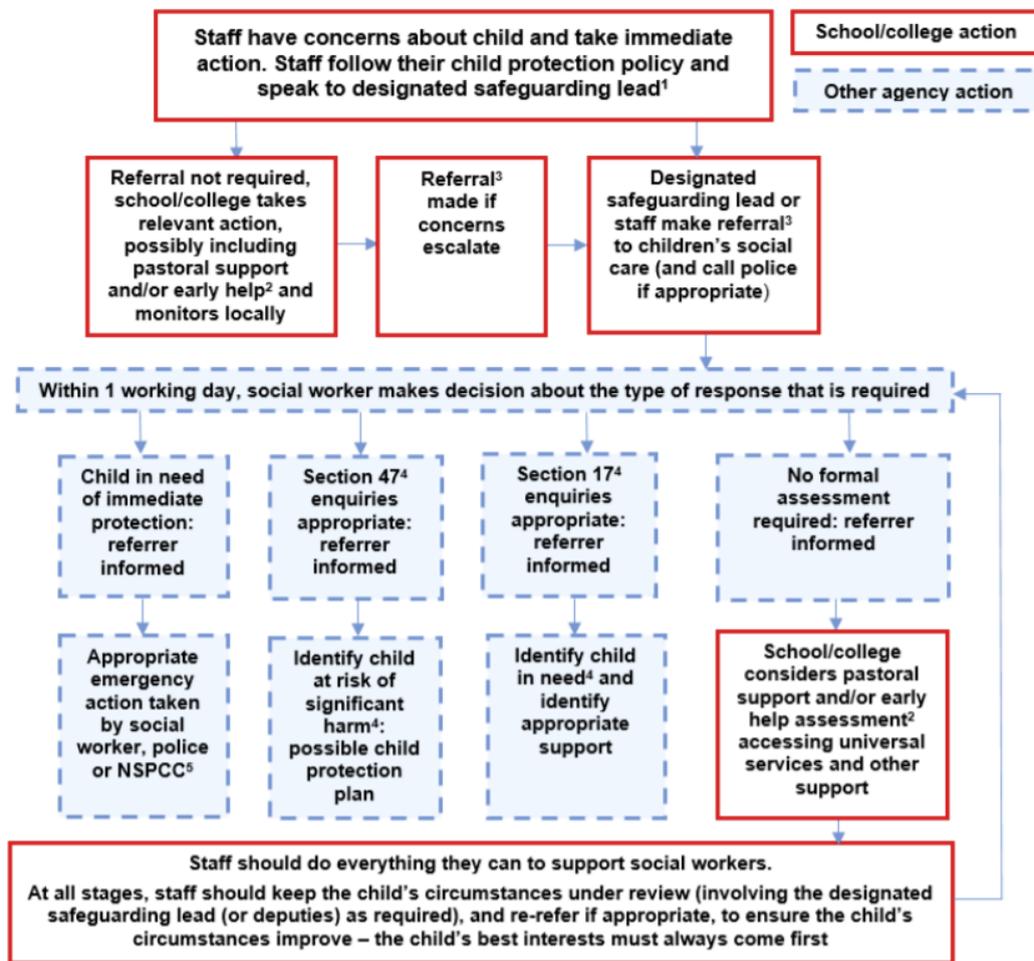
Staff should not discuss concerns with parents until they have consulted with the DSL.

The DSL will normally ask further questions if required in the event of a suspicion or disclosure. Where appropriate, the DSL may request staff to ask further questions to the young person or their parent/carer.

If we believe that notifying the parents 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 abuse made against other young people, we will normally notify the parents of all the young people involved.

Summary diagram of the procedure where there are concerns about a child (no immediate danger):



1 In cases which also involve a concern or an allegation of abuse against a staff member, see point 13 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.

11. Extended school and off-site arrangements

All TCW policies apply whenever and wherever TCW staff and students are working together, including 1:1, online or offline, onsite, 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. See Risk Assessment policy for further details.

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. 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.

12. Mobile phones and cameras

Staff should not 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 ensure we have permission from them and their parents, and make sure it is done in the context of their work. We often require evidence of students' work to ensure progress and to celebrate their efforts.

There are school cameras available for all staff to use if you know you will need to take photos of your student(s) working for school purposes. Please contact the Creative Co-ordinator to book out a camera.

It is preferable not to use your mobile phone to take photographs of a student. If, however, this is absolutely necessary please ensure that the photo is not uploaded to any personal online account. Instead, upload it to the TCW Google Drive or send it as an email to your work email copying in the Creative Co-ordinator. The image should be instantly and fully deleted off your device.

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

All staff must keep their students' data safe (photos, documents, videos etc) by making sure it is kept in GoogleClassroom or TCW folders stored securely online. They need to make sure their students are securing their data as well. They should also delete any information which is duplicated or no longer needed.

13. Allegations against staff and low-level concern reporting

Allegations of harm may indicate that a person who works with children might pose a risk of harm to children if they continue in that role. When an allegation 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 2021 Part 4 and THSCP Supplementary Guidance- Managing Allegations of Abuse against Staff – September 2021*. Please see Appendix 3 for further information, including the contact details for the relevant borough LADOs.

An Allegation is made against a member of staff including supply staff, volunteers, contractors and Trustees, when they:

- 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.

Concerns about staff that do not meet the harm threshold and the allegation criteria set out above are known as **Low-Level Concerns**. Staff should report low-level concerns (and self-report low-level concerns about themselves) in accordance with our procedures and alert their line-manager without delay. These low-level 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.

Concerns about staff that meet the harm threshold above (and so are considered **Allegations**) must be reported by any staff, irrespective of the source, directly to the Head Teacher and ensure that it is put in writing, signed and dated. If the subject of the allegation is the Head Teacher then the allegation should be directly reported to the Chair of Governors.

On receipt of a report of an Allegation (rather than a low-level concern), the head teacher will make immediate contact with the Local Authority Designated Officer for an initial discussion. If the allegation concerns the head teacher, then the Chair of Governors shall make contact with the LADO.

When an allegation is made against a supply member of staff, the head teacher will be the case manager and take the lead in contacting the LADO.

Allegations concerning staff who no longer work at TCW, as well as historical allegations, will be reported to the police.

Please see Appendix 4 for information around Allegations to do with Peer on Peer abuse

14. Complaints and concerns about school safeguarding practices

14.1. Complaints against staff

Please refer to the Dealing with Allegations 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 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 at their initial meeting with TCW.

Any allegation or abuse of a student by a teacher must be reported directly to the Headteacher.

14.2. Other complaints

Please refer to TCW's *Compliments, comments and complaints* policy for further details.

A Partner who is dissatisfied with our services or who has made a comment/asked a question and is not happy with our response may wish to make a complaint. Those wanting to make a complaint may, for instance, raise it by:

- Writing to the manager of the area concerned
- Talking to the Teaching and Learning Officer or Education Support Officer
- Talking to a member of the teaching staff
- Writing to the Headteacher or Chief Executive

TCW will treat each of these as acceptable routes for raising concerns and complaints about the experience of our Partners and will treat with equal seriousness any complaint received, regardless of the route chosen.

The procedures for dealing with complaints are designed to ensure that:

- All complaints are treated seriously and with discretion.
- Appropriate investigations are carried out at management level. An investigating officer will be appointed by the Headteacher/ Chief Executive.
- Complainants can be sure that their concerns are being treated in confidence.
- Complainants receive initial and regular feedback about the progress of their complaint.
- Members of staff feel able to pass on complaints about TCW to the appropriate managers.
- All complaints are properly documented and are dealt with as quickly as is possible.
- All records of complaints will be evaluated to identify TCW improvements.
- There are rights of appeal. This includes complainants and any members of staff who may be the subject of a complaint.
- Information about TCW commitment and procedures will be available to staff and service users through a range of documents and locations.

14.3. 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.

Further guidance on whistleblowing can be found via NSPCC's [Whistleblowing advice line](#). Staff can call 0800 028 0285 – the line is available from 8:00AM to 8:00PM Monday to Friday and email help@nspcc.org.uk

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should consider other channels available, including the NSPCC



Whistleblowing Advice Line 0800 028 0285 which is free & anonymous, more information can be found at nspcc.org.uk/whistleblowing.

15. Record-keeping

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, DDSL and Headteacher will be the only people to have access to these files. Records are kept secure through having GoogleDrive logins that are password protected. Records are kept confidential and are not printed unless absolutely necessary. They are then shredded.

15.1. Record keeping and data protection

Please refer to our Data Protection policy.

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, students or trustees who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment
- 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)

15.2. 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

5.7 Safeguarding					
Basic file description	Data Prot 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 pupils implicated	Yes		Closure + 35 years	DESTROY unless legal action is pending	
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 allegations are malicious we will destroy the record immediately.

Please see Appendix 2 for our 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.

16. Training

16.1. All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand our safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and in line with advice from safeguarding children partnerships.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify young people at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, staff meetings, and the safeguarding section within the bulletin and newsletter) as required, but at least annually.

We very rarely have volunteers, but if and when we do, they will receive appropriate training.

16.2. The DSL and DDSL

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

16.3. Trustees

The Trustee with safeguarding responsibilities receives Designated Safeguarding Lead training which is updated every 2 years to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

Additionally, all Trustees will complete relevant Safeguarding training to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities.

16.4. Recruitment – 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.

16.5. 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, promote the interests of young people and allow for confidential discussions of sensitive issues.



16.6. 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.

17. Monitoring arrangements

This policy will be reviewed **annually** by the TCW DSL and DDSL with discussion from Chrissie Roberts, CEO; Adam Dalton, Headteacher/Out of hours DSL. 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. 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.

TCW is aware that children can be at risk of abuse, harm and exploitation beyond the family home. Extra familial harms include sexual exploitation, criminal exploitation, serious youth violence, and abuse that occurs on digital and online platforms. All staff, especially the DSL and Deputy DSLs, 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 - may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual - 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. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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 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.

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information gained as part of the checks described in this appendix in our single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Ask them to complete a Consent form (GDPR Regulations) and other personal information documentation
- Obtain a minimum of two satisfactory references. Where a reference does not give sufficient information then a third reference will be requested.
- Verify their ID
- Ask them to provide two proof of address (Less than 3 months old)
- Obtain Right to Work in the UK. If a person has lived/worked overseas for 3 months or more in the last 10 years a Certificate of Good Conduct needs to be provided or a reference.
- Enhanced DBS check – people who are working or seeking to work in regulated activity with children, this allows an additional check to be made as to whether the individual appears on the working with children barred list. We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Verification of qualification including QTS with the –Teaching Regulation Agency.
- Verification of an applicant's previous employment history and experience
- Verification that the applicant has the health and capacity to carry out the role
- Ask them to attend the Induction programme that ensure a "safeguarding children" culture is adopted and embedded into continuing practice
- Need to specify if the role has a probationary Period (only applies to salaried staff)
- Obtain a teachers prohibition check - A prohibition order means that the individual concerned is not allowed to undertake unsupervised teaching work in schools, or other set-ups defined under the regulations.
- Complete Safeguarding Course and Prevent training course (renewed every 2 years)
- For managers – Section 128 check – prohibits or restricts a person from taking part in the management of an independent school.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- As an Independent school, check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State

As we work with children younger than 8 years old, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the

individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising young people
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with young people
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with young people, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with young people

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Volunteers

It is very rare that we have volunteers, however if and when we do, we will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity



- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with young people on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Trustees

- All Trustees will have an enhanced DBS check and section 128 check
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The Chair of the Trustees will have their DBS check countersigned by the Secretary of State.

All Trustees will also have the following checks:

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise students on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect young people from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 3: allegations of abuse made against staff

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 Tower Hamlets Local Authority Designated Officer (LADO), regardless of whether the student making the allegation resides there. The Tower Hamlets LADO's contact details are as follows – telephone: 020 7364 0677, email: LADO@towerhamlets.gov.uk

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

Procedure for dealing with allegations

In the event of an allegation that current staff has acted in any of the ways detailed above, this should immediately be reported to the Headteacher. If the Headteacher or CEO is the subject of the allegation, it should be reported to the Chair of Trustees. The Headteacher (or Chair of Trustees 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 enquires 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

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 your 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 2019 and the Tower Hamlets 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.

Appendix 4: Specific safeguarding issues

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of child sexual abuse. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual



activity appears consensual. Apart from age, other factors that could make a child more vulnerable to exploitation include gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

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 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).

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, as they may believe they are in a genuine romantic relationship. 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.

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.

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 or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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 boys or girls 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; and
- 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 'traphouse 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

Serious Youth 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.

Online Harms

Please refer to TCW's 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; 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 messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.



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

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

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- Contact: being subjected to harmful online interaction with other users; 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 nudes and semi-nudes), and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. When students are at risk of phishing, school can report concerns to the Anti-Phishing Working Group (<https://apwg.org/>).

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 (cyberchoices.uk). 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.

It is essential that our students are safeguarded from potentially harmful and inappropriate online material, including when they are taught remotely. We have appropriate filters in place and use the monitoring system GoGuardian to track and follow up on concerning internet use, both when students are at school and when using their school accounts at home. All remote lessons are recorded in order for students and staff to be safeguarded.

All staff complete online safety training as part of their induction and the refresher training taking place at least every two years. They are also made aware of and agree to follow the staff Code of Conduct as part of their induction. In addition, they read the Mobile phone usage and Social networking policies.

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, and parental engagement.



Staff should report Online Safety concerns about students to the Designated Safeguarding Lead 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 PLAC 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 including physical, emotional and economic abuse and coercive and 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. 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 peer on peer abuse is sometimes referred to as 'teenage relationship abuse'.

TCW has signed up to the Metropolitan Police's Operation Encompass system and on receipt of a notification from the Police will provide appropriate support to the child or children concerned, who attend the school. 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. The purpose of Operation Encompass is to enable schools to provide 'silent support' and is not intended to replace statutory procedures.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

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.



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.

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**, 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 (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures and report concerns to the Designated Safeguarding Lead. If in doubt, staff should speak to the Designated Safeguarding Lead.

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.

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

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 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 fm@fco.gov.uk
- Refer the student for support, such as school counselling, as appropriate

Please find more information in The Forced Marriage Unit's (FMU) guidance on Forced Marriage [here](#).

Radicalisation and Extremism

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.

- 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.
- 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).

More information about schools' Prevent duty under the Counter-Terrorism and Security Act 2015 can be found [here](#) (paragraphs 57-76).

Child on Child / Peer on Peer Abuse

Staff must be aware that children may be harmed by other children.

Peer on Peer Abuse can happen both inside and outside of school including online. It is important that all staff recognise the indicators and signs of peer on peer abuse.

Staff should treat all reports of peer on peer abuse very seriously and make it clear that all forms are unacceptable. Abuse is abuse and will never be dismissed as 'banter' or 'part of growing up'. TCW adopts a Zero Tolerance Approach to peer on peer abuse.

All staff should recognise that even though there are no reported cases of peer on peer 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 peer on peer abuse and girls will be victims of peer on peer abuse. However, all forms of peer on peer abuse are unacceptable and will not be tolerated at TCW.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- 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, 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 peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

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 – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour
- 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 / Peer on Peer 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 sex from primary to secondary phases and beyond. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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 peer on peer 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.

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 upskirts. Dismissing or tolerating such behaviours will help to normalise them.

Sexual violence offences are defined under the Sexual Offences Act 2003

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. 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.

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, co-ercion 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, either written or electronically, and kept under review. The designated safeguarding lead 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.

Youth Produced Sexual Imagery

Youth Produced Sexual Imagery is one 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 '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.

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
- 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 Youth Produced Sexual Imagery, staff must be aware that it is illegal for staff to view or share such imagery. Staff should immediately report the disclosure to the Designated Safeguarding Lead.

In line with UKCIS's guidance, [Sharing Nudes and Semi-Nudes. Advice for Education Settings working with Children and Young People 2020](#), we will respond to all incidents of Youth Produced Sexual Imagery 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)
- Parents 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 Youth Produced Sexual Imagery 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 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.

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 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 in some cases 16 and 17 year olds could be living independently from their parent/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.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent 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.

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 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. Where 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

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 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 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, 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, forced labour, slavery, servitude, forced criminality and 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 is available in the Modern Slavery Statutory Guidance.

Appendix 5: Covid-19

The DfE guidance 'Contingency framework: education and childcare settings' states that despite Covid-19 restrictions, there should be no change to local multi-agency safeguarding arrangements, which remain the responsibility of the 3 safeguarding partners:

- local authorities
- clinical commissioning groups
- chief officers of police



During the pandemic and its different stages, we will continue to follow the safeguarding requirements outlined in Keeping Children Safe in Education and Working Together to Keep Children Safe.

In line with the Contingency guidance, the TCW Child Protection and Safeguarding policy has been reviewed to ensure that it remains effective. This will be an ongoing process as needed. In addition, our staff handbook has been updated to reflect changes and issues teachers must consider when working remotely, including safeguarding.

We recognise that there has been an increase in the levels of need and vulnerability in our students during this time. The DSL and DDSL will continue working together with external agencies such as Social Care, as well as internal support teams such as Interventions, in order to safeguard our students as efficiently as possible.

At least one trained DSL or DDSL will be available, onsite or remotely, at all times throughout the pandemic. If it is not possible for a trained DSL (or DDSL) to be onsite, a senior leader will take responsibility for coordinating safeguarding on site.

Further information on how TCW will work with and ensure the safety of students and staff, can be found in the Health & Safety and Distance and Blended Learning policies.