

Cedars Manor School



CHILD PROTECTION AND SAFEGUARDING POLICY

Approved by:	Governors	Date: October 2026
Last reviewed on:	September 2026	
Next review due by:	September 2027	

Safeguarding Team Contacts at Cedars Manor School

Role:	Name and contact details:
Designated Safeguarding Lead (DSL)	<i>Magda Bellis</i>
Deputies DSL(s)	Emma Brice Julie Smeulders
Named safeguarding governor	Sameera Wazeri
Chair of Governors	Neehar Shah
School online safety Lead	Asher Lovell
Designated teacher for Children in Care and children previously in care (CiC)	Assistant Headteachers
<i>Senior Mental Health Lead</i>	Magda Bellis
<i>Mental Health Practitioner</i>	Muireann Hanlon
<i>Prevent Lead</i>	Assistant Headteacher
<i>Protective Security and Preparedness Lead</i>	Richard Manners

Table of Contents

1. Ethos statement
2. Introduction
3. Statutory framework
4. Key roles and responsibilities
5. Induction & Training
6. Recognising concerns – signs and indicators of abuse
7. Specific safeguarding issues
8. Children potentially at greater risk of harm
9. Curriculum
10. Online safety and filtering & monitoring
11. Procedures
12. Information sharing, record keeping and confidentiality
13. Managing allegations made against teachers, including supply teachers, other staff, volunteers and contractors.
14. Use of school premises for non-school activities
15. Whistleblowing
16. Useful contacts and links
17. Appendix A Body Map
18. Appendix B recording safeguarding concerns or guidance for raising concerns on CPOMS: school's safeguarding management system; further information on specific safeguarding issues

School Child Protection and Safeguarding Policy Framework

Cedars Manor School has a whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do and underpins all systems, processes and policies. It is important that our values are understood and shared by all children, staff, parents/carers, governors and the wider school community. Only by working in partnership can we truly keep children safe.

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

Keeping Children Safe in Education 2025

1. Ethos statement

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

2. Introduction

The governing body/proprietor¹ recognises the need to ensure that it complies with its duties under legislation and that this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Harrow Safeguarding Children's Board.

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

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the
- home, including online
- preventing the impairment of children's mental and physical 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

This policy is for all staff, parents, governors, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's Code of Conduct (including Acceptable Use of ICT), Safer Recruitment Policy, Online Safety Policy, Positive Behaviour Policy, Anti-Bullying Policy, the school's guidance on low-level concerns² Child-on-Child Abuse Policy and procedures, and Part one of KCSiE, copies of which will be provided to all staff on induction.

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

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

This policy aims to:

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

The governing body expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working directly with children **must**, as a minimum, have read and understand [Part One of KCSiE](#) and Annex B. Governors/the proprietor will ensure that they and senior leaders have read and understand [Parts One and Two of KCSiE](#). The governing body will ensure that those staff who do not work directly with children have read either Part One or Annex A of KCSiE.³ together with Annex B. There may be some staff whom the governing body require they read additional sections⁴.

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

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

3. Statutory framework

Section 175 of the Education Act 2002 (as amended) in the case of maintained schools and pupil referral units⁵, Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools (including academies and free schools), the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) for post 16 education providers, place a statutory duty on governing bodies and proprietors to have policies and procedures in place that safeguard and promote the welfare of children and young people who are pupils of the school which must have regard to any guidance given by the Secretary of State.

In accordance with statutory guidance, Working Together to Safeguard Children 2023, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint duty for a range of roles and statutory functions, including developing local safeguarding policy and procedures and scrutinising local arrangements. In Harrow, all schools have been named by the Harrow Safeguarding Children's Board (HSCB) as relevant agencies. This means staff in schools must work in accordance with the multi-agency procedures developed by the HSCB, which can be found on their website at: [HSCB](#)

4. Key roles and responsibilities

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

⁴ The governing body/proprietor may decide that some roles should read additional parts of the guidance, e.g. colleagues involved in safer recruitment administration, including the maintenance of the single central record, should also read Part Three of KCSiE.

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

Governing Body

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

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

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

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

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

- child-on-child abuse
- online safety
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying, misogyny/misandry)
- special educational needs and disability
- supporting pupils in school with medical conditions
- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to children who go missing from education, particularly on repeat occasions.
- safer recruitment

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

The governing body will ensure that there is a named governor for safeguarding, a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for

Be Ready - Be Respectful - Be Safe - Be Responsible - Be Resilient - Be Courageous

safeguarding and child protection, and a designated teacher to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The governing body will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).⁶

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

Designated Safeguarding Lead (DSL)

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

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

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

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

The DSL will undergo training to provide them with the knowledge and skills to carry out the role and is expected to update their knowledge and skills at regular intervals to allow them to keep up with developments relevant to their role.

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

Headteacher

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

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

All staff

All staff have a responsibility to provide a safe environment in which children can learn. All staff working directly with children must read and ensure they understand at least Part One of KCSiE. Those staff who do not work directly with children must read and ensure they understand either at least Part One or Annex A of KCSiE.⁸

⁶ Set out in paragraphs 83-93 of KCSiE

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

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

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

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

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

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

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

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

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

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

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

5. Induction & Training

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

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-level concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE (or Annex A for those staff who do not work directly with children)⁹ will be provided to new staff at induction.

The governing body will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements, the governing body will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all pupils.

6. Recognising concerns - signs and indicators of abuse.

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

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

All staff should consider whether children might be at risk of abuse or exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms, including sexual abuse (including harassment and exploitation), domestic abuse in their own

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

intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

In all cases, if staff are unsure, they should always speak to the DSLs/DDSLs.

Indicators of exploitation, abuse and neglect

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

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

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

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

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

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

(Source: Keeping Children Safe in Education)

7. Specific safeguarding issues

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

Child-on-child abuse

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos¹⁰ (also known as sexting or youth-produced sexual imagery)

¹⁰ UKCIS guidance: Sharing nudes and semi-nudes advice for education settings.

*1 [Shore Space](#)

- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should be clear about the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it *1

Early help

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

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

Both CSE and CCE are forms of abuse, and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for exploitation. *2

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Child Sexual Exploitation (CSE)

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

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

*2 <https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation>

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship. *3

Domestic Abuse

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

Female Genital Mutilation (FGM)

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

Mental Health

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

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

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

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

Cedars Manor works closely with an NHS Mental Health Support Practitioner who is on site one day a week. The school's Pastoral Lead is a senior mental health lead and enhances the school's approach to being mentally healthy. This is further supported through the school's access to The Harrow CAMHS referral service, which can accept referrals along with Harrow Horizons.

Serious violence

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

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

*3 [helping-education-settings-identify-and-respond-to-concerns/](#)

8. Children potentially at greater risk of harm

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

Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The cohort of pupils in Alternative Provision often have complex needs; it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The management committee/proprietor will have regard to the following statutory guidance:

[Alternative provision – DfE Statutory Guidance](#), and

[Education for children with health needs who cannot attend school – DfE Statutory Guidance](#)

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

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

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

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

Children absent from education.

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

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

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

- › Are supervised by the youth justice system
- › Cease to attend school
- › Come from new migrant families

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

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

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

Further information and support includes:

- Schools' duties regarding children who are absent from education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points, can be found in the DfE's statutory guidance: [Children Missing Education](#).
- General information and advice for schools can be found in the Government's [Missing Children and Adults Strategy](#).
- Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time Enrolment of 14 to 16-year-olds in Further Education and Sixth Form Colleges](#)
- Statutory guidance for schools concerning children who are absent from education <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

Elective Home Education -

https://assets.publishing.service.gov.uk/media/66bf6d2bdcb0757928e5bd47/Elective_home_education_departmental_guidance_for_local_authorities.pdf

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

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

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

Children requiring mental health support

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

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

The school works in collaboration with the Mental Health Support Team (MHST) and has a mental health practitioner on site one day a week. MHST's are working with three core objectives in mind:

1. To deliver brief **evidence-based interventions** to support children and young people with mild-moderate mental health problems.
2. To support schools in developing their **whole school approach** to mental health.
3. To provide timely **advice** to school staff and liaise with external services to help children and young people to get the right help and stay in education.

Through this service, young People and parents can be offered a pre-referral meeting before consent to a referral. This is to offer an opportunity to gain more information about the service and discuss current issues before deciding whether the service and timing are right for them. If the MHST offer does not seem like a good fit for the support required, other suggestions can be offered and shared with the school (see Referral Criteria Appendix F)

Staff can access further advice in a DfE guidance document, [Preventing and tackling bullying](#) and [mental health and behaviour in schools](#), which sets out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole-school approach to social and emotional wellbeing, which is tailored to the needs of pupils. Our senior mental health lead is supported by the senior leadership team and is the Pastoral Lead and DSL.

Looked-after children and previously looked-after children.

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

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

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.

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

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

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

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

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

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

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

Further information can be found in the DfE's:

[SEND Code of Practice 0 to 25 years](#), and from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

Children who are lesbian, gay, bisexual, or gender questioning

The governing body acknowledges that a child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

9. Opportunities to teach safeguarding

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

The governing body recognises that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

Relevant topics will be included within Relationships, Sex and Health Education having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. *4

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

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

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

10. Online safety and filtering and monitoring

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

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

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

*4 [Relationships Education, Relationships and Sex Education and Health Education guidance](#)

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

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

The governing body will ensure that an annual review is undertaken of the school's approach to online safety, including reporting on the effectiveness of the school's filtering and monitoring provision,

Be Ready - Be Respectful - Be Safe - Be Responsible - Be Resilient - Be Courageous

supported by an annual risk assessment that considers and reflects the risks pupils face online. Schools can use the department's ['plan technology for your school service'](#) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

The review should include a member of the senior leadership team, the DSL, the IT service provider and a governor. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security, including considerations, can be found at [Cyber security training for school staff - NCSC.GOV.UK](#).

The school's online safety policy outlines the appropriate filtering and monitoring which takes place on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation to filtering and monitoring. ***5**

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

At Cedars Manor we recognise that mobile phones, including smartphones, are an important part of everyday life but not a part of school life. Our [Mobile Phone Policy](#) aims to: Promote, and set an example for, safe and responsible phone use; Set clear guidelines for the use of mobile phones for pupils, staff, parents/carers and volunteers; Support the school's other policies, especially those related to child protection and behaviour;

This policy also aims to address permission to bring mobile phones into school, and some of the challenges posed by mobile phones in school, such as: Risks to child protection; Data protection issues; Risk of theft, loss, or damage.

***5** [artificial-intelligence-in-education](#)

11. Procedures

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue, they should record their concerns on the school's safeguarding management system, CPOMS, or on a school recording form for safeguarding concerns (if they have no access to CPOMS, such as visitors) and pass it to the DSL without delay.

What to do if you are concerned.

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

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth;
- Only ask questions when necessary to clarify; do not investigate or ask leading questions;
- Reassure the child, but don't make promises which it might not be possible to keep;
- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record, which should be signed and include the time, date and your position in school;
- Do not include your opinion without stating it is your opinion;
- Pass the information to the DSL or alternate without delay;

- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

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

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

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

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

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

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

School staff should report any concerns to the DSL or DDSL and then onto CPOMs.

*Procedures for reporting and escalating concerns about child-on-child abuse, including child on child sexual violence and sexual harassment, are detailed in **Appendix D**.*

12. Information sharing, record keeping and confidentiality

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

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

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

[services to children, young people, parents and carers](#) which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and UK Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Well-kept records are essential to good child protection practice.

"Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc."

If in doubt about recording requirements, staff should discuss with the DSL/DDSLs.

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

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

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

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

The General Data Protection Regulation and the Data Protection Act 2018 state that the school has the authority to share information with the Local Authority "in the exercise of our official duties without seeking consent".

The "**public task basis**" as described in the legislation allows authorities to use data when they can demonstrate that the processing is to perform tasks that are set by national law. This means parental consent is not necessary for the obtaining and sharing of information "Between agencies when that information is for child protection or safeguarding purposes or for an assessment of a child or children's needs."

"Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law." GDPR Article 6

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

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

The school will follow the HSCB [Managing allegations against staff and volunteers](#) if a safeguarding concern or allegation is raised against an adult in a position of trust.

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

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

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

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

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

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

14. Use of school premises for non-school activities

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

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

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

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

15. Whistleblowing

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

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

The governing body would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within the school, including the whistleblowing procedure adopted by governors/proprietor where necessary [[whistleblowing-policy \(harrow.gov.uk\)](https://www.harrow.gov.uk/whistleblowing-policy)]. However, for members of staff who do not feel able to raise such concerns internally, there is an NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00 am to 8.00 pm, Monday to Friday) or email: help@nspcc.org.uk Useful Contacts:

Harrow Children's Social Care & Multi-agency Safeguarding Hub (MASH)	'Golden Number': 020 8901 2690 Emergency Duty Team: weekends, bank holidays and between 5 pm-9 am during the week: 020 8424 0999
Police	101 or for emergencies: 999
FGM - Mandatory reporting	Police on 101
Local Authority Designated Officer for Allegations against staff (LADO)	Initial referrals via MASH/Golden Number LADO: Lado@harrow.gov.uk
Children and Young People with Disabilities 0-25 years	020 8966 6481
Local multi-agency procedures, guidance and Training: Harrow Strategic Safeguarding Partnership	www.harrowscb.co.uk/
NSPCC	0800 800 5000
Report Abuse in Education NSPCC Helpline	0800 136 663
Childline	0800 1111
Government's Whistle-blowing Service via NSPCC Report Line	0800 028 0285
Forced Marriage Unit	Tel: 020 7008 0151 From overseas: +44(0)20 7008 0151 (Mon-Fri 9 am-5 pm) Out of hours: 020 7008 1500 (ask for Global Response Centre) Email: fm@fco.gov.uk
Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)	Tel: 020 7340 7264 Email: counterextremism@education.gsi.gov.uk
Disclosure and Barring Service	Tel: 03000 200 190 Email: customerservices@dbf.gov.uk
Teaching Regulation Authority	Tel: 020 7593 5392 Email: misconduct.teacher@education.gov.uk

16. Appendix A

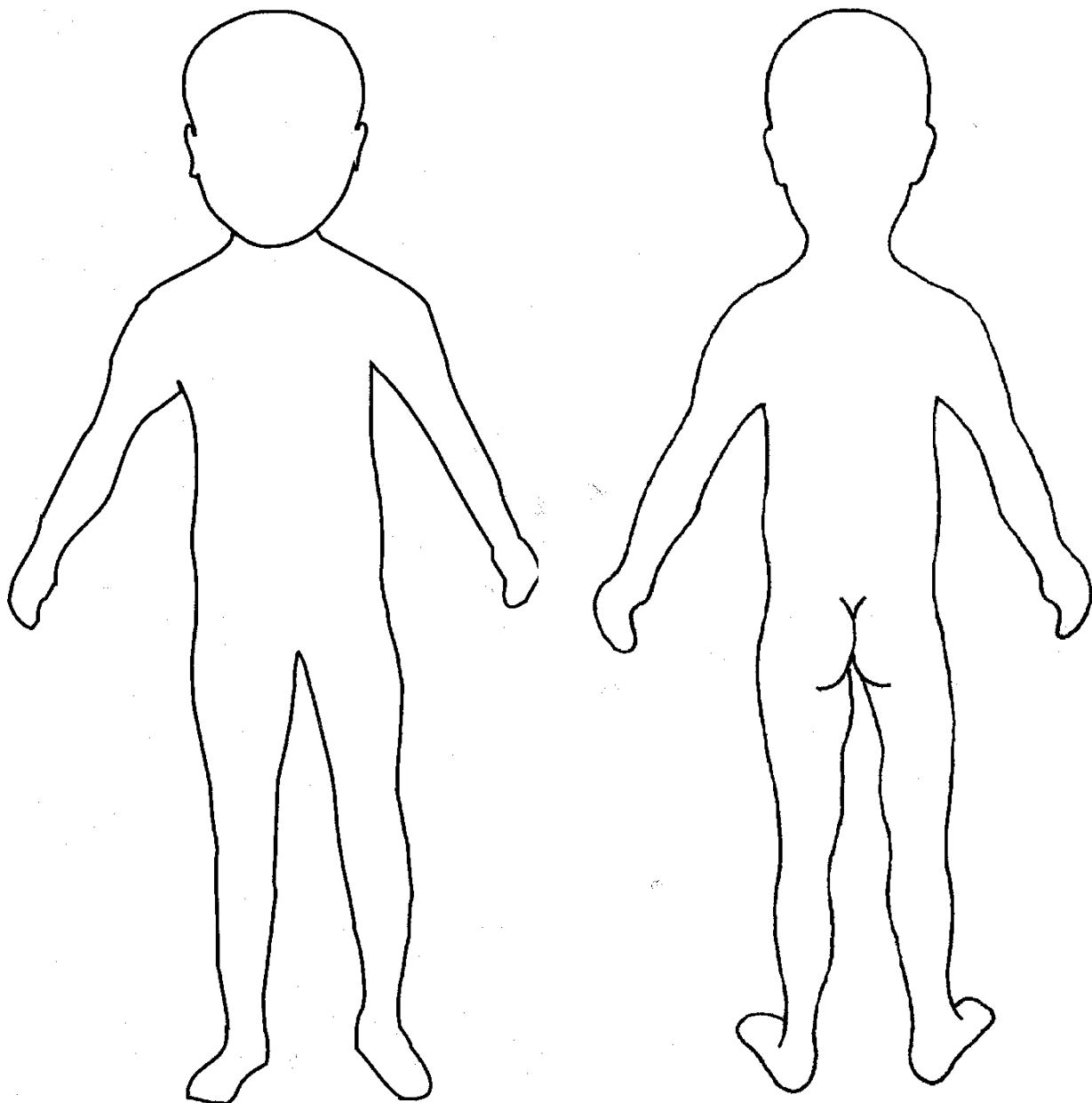
BODYMAP

(This must be completed at the time of observation)

Name of Pupil: _____ Date of Birth: _____

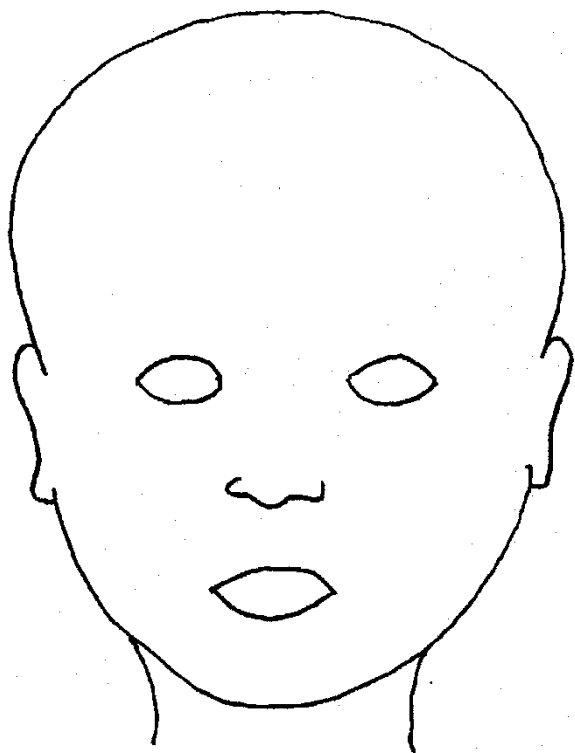
Name of Staff: _____ Job title: _____

Date and time of observation: _____

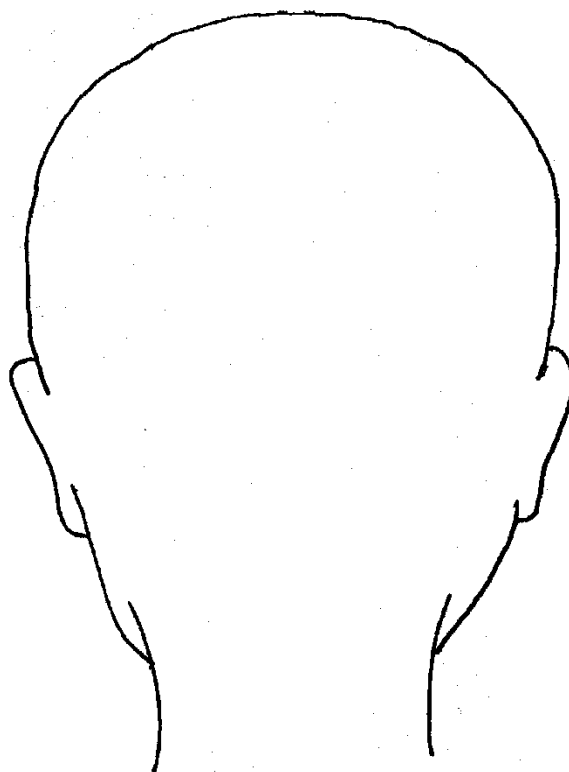


Name of
pupil: _____

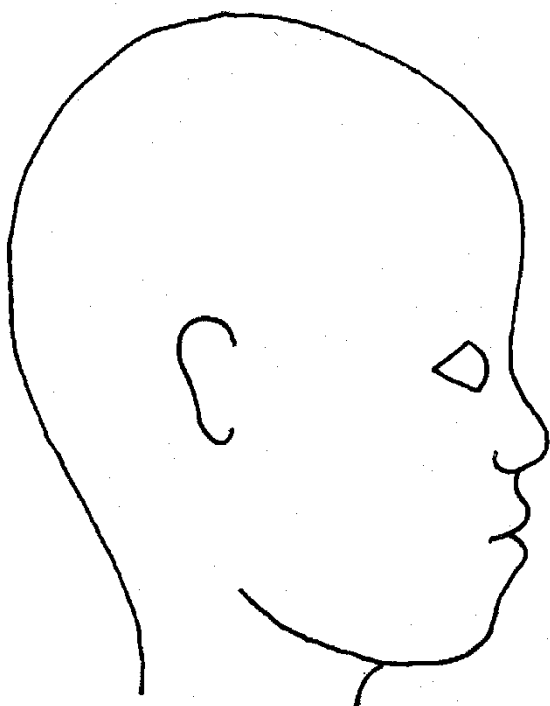
Date and time of
observation: _____



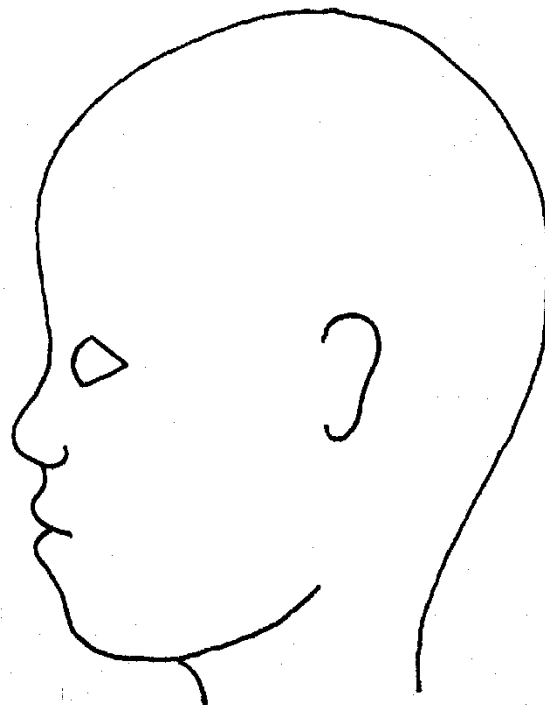
FRONT



BACK



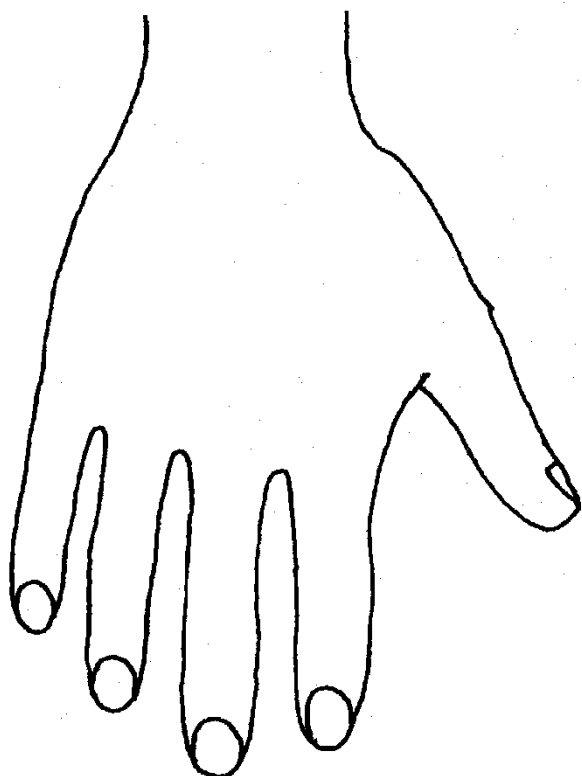
RIGHT



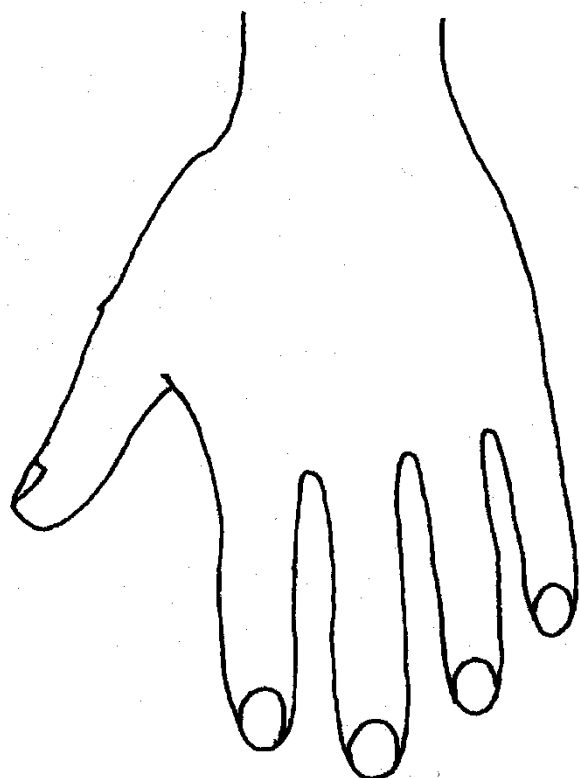
LEFT

Name of pupil: _____

Date and time of
observation: _____

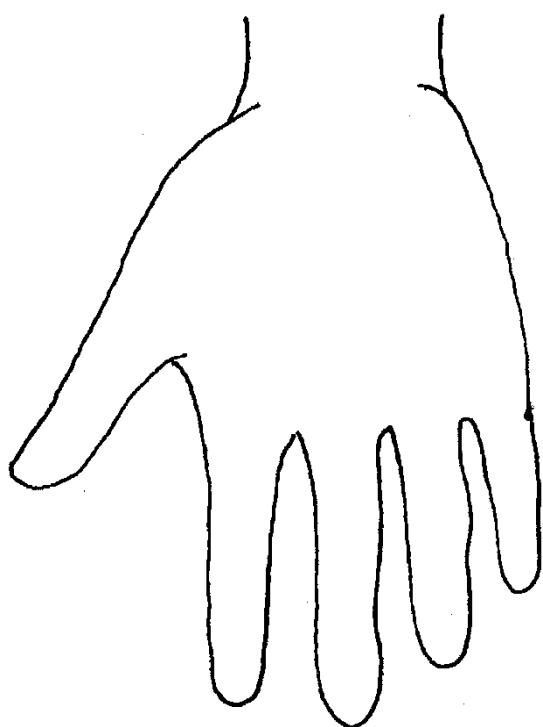


R



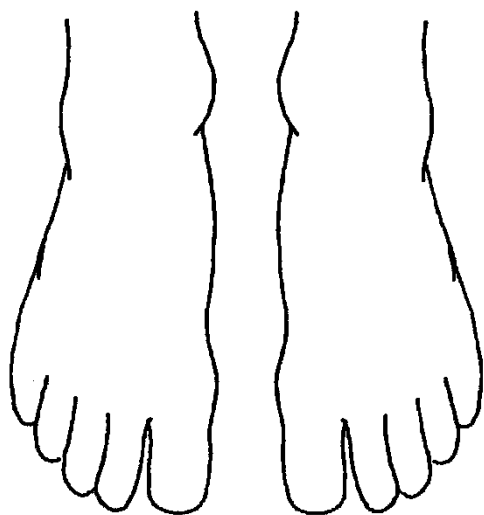
L

BACK



Name of Pupil: _____

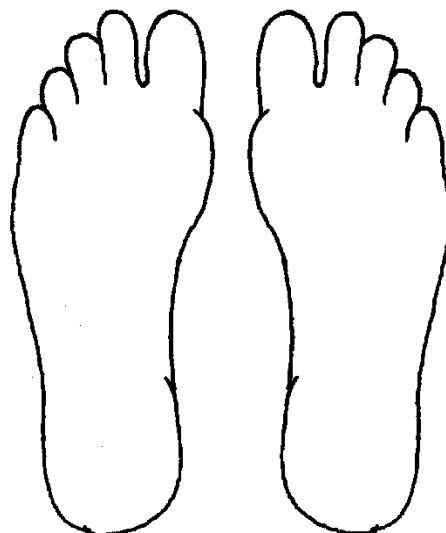
Date and time of
observation: _____



R

TOP

L



R

BOTTOM

L



R

INNER



L



R

OUTER



L

Printed Name,
Signature and Job
title of staff: _____

Appendix D

What is child-on-child abuse?

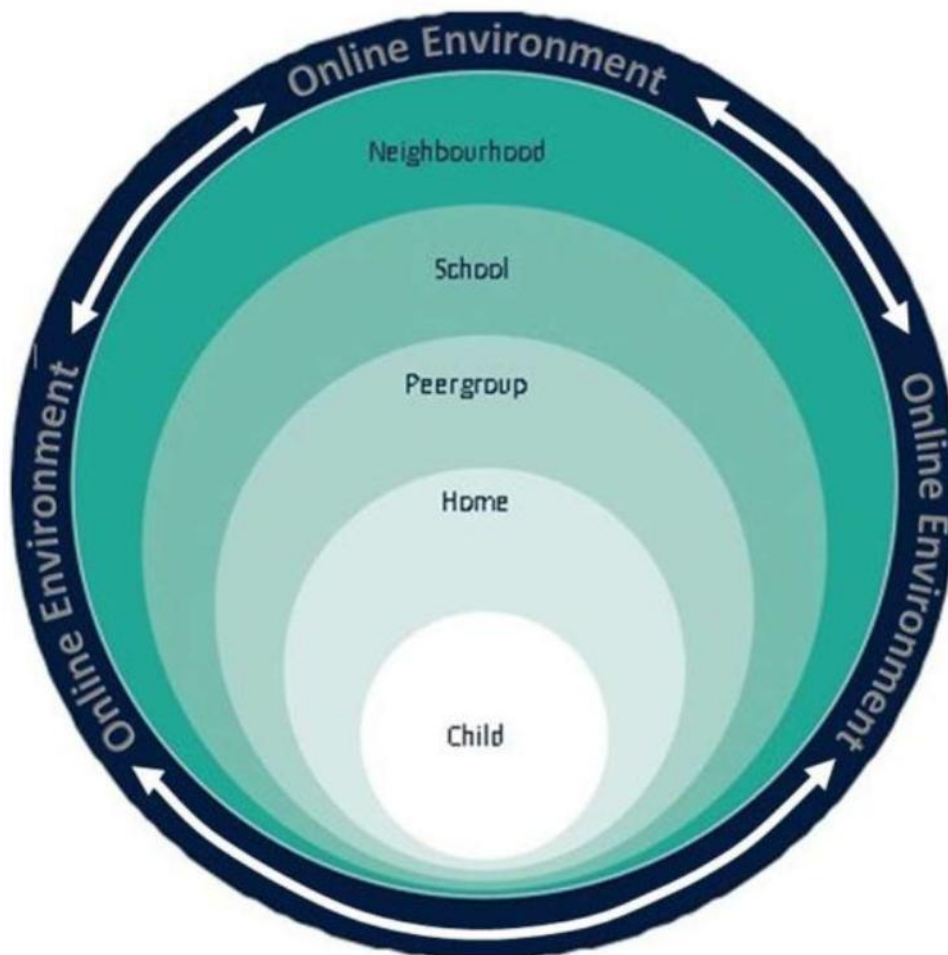
Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

Child-on-child abuse includes, but is not limited to:

- Serious bullying (including cyber-bullying, prejudice-based and discriminatory bullying),
- Abuse in intimate personal relationships between peers,
- Physical abuse
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment
- Child sexual exploitation
- Sexting (consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery);
- Upskirting or Downblousing
- Initiation/hazing type violence and rituals
- Youth and serious youth violence
- Gender-based violence.



Research suggests that child-on-child abuse is one of the most common forms of abuse affecting children in the UK. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse and capture the full context of children's experiences.



Appendix B – CPOMS Guide: What to Do

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child. All safeguarding incidents at Cedars Manor School are recorded and managed in CPOMS, a safeguarding and child protection management system for schools.

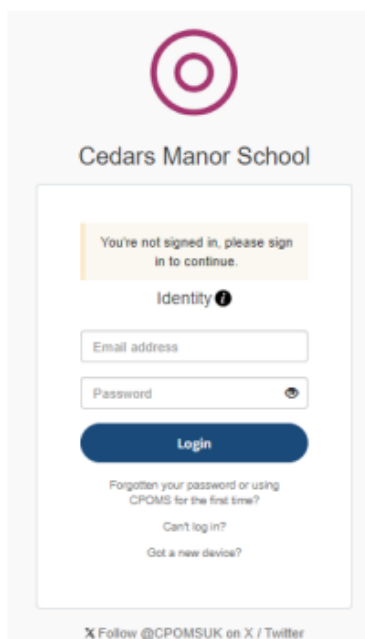
We use CPOMS because we are:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- acting to enable all children and young people to have the best outcomes.

Step 1: CPOMS site: Click on the following link:

[Login](#)

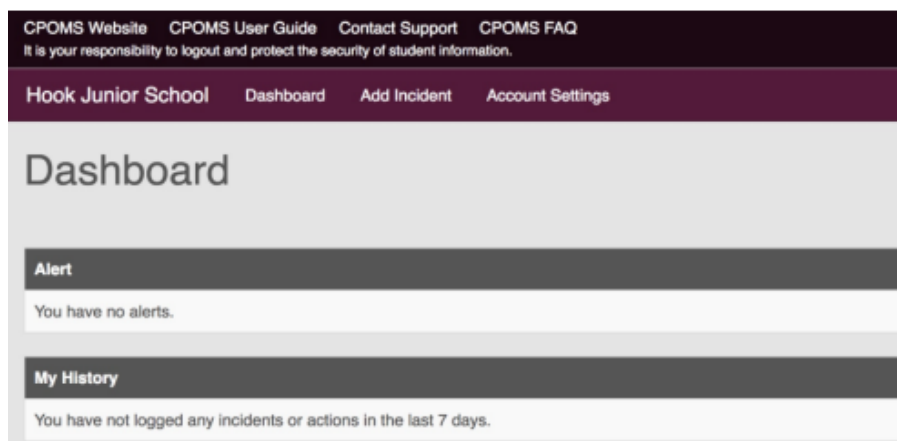
Step 2: Logging in: Enter the credentials for your email address and password



Step 3: Recording Safeguarding Incidents:

Once logged in, you are presented with the CPOMS dashboard. This provides two major functions for you as a staff member:

- view incidents that you have been alerted to
- add a new incident



Step 4: Adding an Incident

Any safeguarding incident involving a child must be recorded on CPOMS. The process is started from the CPOMS dashboard - select the 'Add Incident' link on the purple toolbar at the top of the CPOMS page.

The screenshot shows the 'Add Incident' form in the CPOMS system. The form is titled 'Add Incident' and has a 'Back' button. It contains several sections: 'Student' with a search field, 'Incident' with a large text area, 'Categories' with checkboxes for various incident types, 'Linked student(s)' with a search field, 'Body map' with a dropdown, 'Date/Time' with date and time pickers, 'Alert Staff Members' with a search field and a 'Who should I alert?' button, 'Files' with an upload button, and 'Agency Involved' with a 'Select Agencies' button and an 'Add Incident' button.

Step 5: Complete the details as follows:

- Student: Type the pupil name; start typing, and the system will make suggestions for completion.
- Incident: Describe the incident you are recording; be as accurate and as specific as possible; if using a student name, make sure this is spelt identically to the Student or Linked Student fields. Only write facts. (Who, What, When, Where)
- Categories: Select at least one category; you can select more than one if appropriate. If the child has SEN or an EHCP, please also select this category.
- Linked Students: Type the name of any pupil that may be linked to this incident, e.g. a sibling or classmate; this will ensure the incident is presented when viewing linked student records. Add as many linked students as necessary.
- Body Map: If appropriate, expand the Body Map and add markings to the illustration to indicate where physical evidence has been identified. Note the number that appears with each mark on the Body Map and refer to this number when describing the physical evidence.
- Date / Time: Enter the Date and Time the incident occurred. These will both default to the current Date and Time.
- Status: Please leave this as ACTIVE.
- Assign to: Please DO NOT select a member of the Safeguarding Team.
- Add to this list any staff members who should be aware of the incident (DSL and other safeguarding leads in the school). Staff will be alerted to the incident via their CPOMS Dashboard (the page they see immediately after login). Staff members who have been selected to receive alerts will also receive an email requesting that they log in to CPOMS and review the incident.
- Files: If you have files to support the incident, these can be uploaded here (for example, meeting minutes, Detention Behaviour Reflection Sheets). Press the upload button or drag and drop a file into the Files box.
- Agency Involved: Optionally, you can add any agencies that may be involved with this particular incident.

- When you have finished adding all details to the Incident, press the 'Add Incident' button to submit the content and record it permanently in CPOMS.

When you log an incident on CPOMS – please let a member of the Safeguarding Team know immediately by phone call or in person. CPOMS does not take the place of the discussion; it is a recording tool.

Golden Rules when recording a concern-Use of Language

When recording a concern, the record must be:

Accurate

- Be specific
- Use a body map if the concern relates to a part of the body, and describe the injury/bruise/mark, etc.
- Include the voice of the child, using their exact words or phrases
- Use neutral language

Adequate

- Be written for a range of audiences, both internally and externally, e.g. Children's Services, Police

Comprehensive

- Include context that led up to the incident
- Include immediate actions taken and any action taken to speak to children involved in the concern
- Any further actions taken (such as a referral being made)
- The reasons why a decision was made not to refer to a statutory agency (if relevant)

Factual

- Answer who, when, why, what
- Justify any subjective statements with evidence - it is essential that fact is differentiated from opinion. Opinions can be expressed, but it is important that phrases such as 'in my opinion' or 'in my view' are used and justified with evidence
- Direct observations must be recorded and clearly noted as 'I observed' or 'I witnessed'

Relevant

- Include all information relating to the concern, including the context
- Do not include information which is not relevant
- The name and role of the person/s
- To whom the concern was made
- The full names of all parties involved in the incident e.g., Ms Jenny Smith, DSL, Mr Bob Day (father)

Timely

- Recorded and passed on as soon as possible, and before the end of the school day

Golden Rules when analysing a concern

When analysing a concern, the DSL must consider:

What are the risks? Consider all pieces of information you have available ('contextual safeguarding'):

Be Ready - Be Respectful - Be Safe - Be Responsible - Be Resilient - Be Courageous

- Attendance and punctuality
- Family members and relationships
- Previous CP/Welfare concerns
- Any behaviour/bullying concerns
- Relationships between those involved in the concern
- Peer group and influences
- Environmental factors
- Other relevant factors inside or outside the school – consider online media
- Other children in the school if there has been child-on-child behaviour

What is needed to establish the best course of action?

- Who in the school has more information that can add to your understanding? SENCO, AHTs, Headteacher, Welfare officer, Teaching assistants, etc.
- Does the concern need to be referred to an external agency (e.g., MASH, police)?
- What will be recorded by the DSL?
- What action(s) were taken, by whom and why; what was the rationale? Include timeframes as relevant.
- What measures have been put in place to ensure the child is safe? Who is going to do this, and when will they provide feedback to the DSL?
- Will the record need to be reviewed to ensure the child remains safe? When will that review take place? Make sure you put in a date
- If the plan is to 'monitor', what will this look like? What are you monitoring? Who will do this, and how often will it be reviewed? The review needs to be recorded, evidencing whether the plan is working or not and whether there are any changes to the plan

Good Practice Examples

Good Practice Example of Recording by Class Teacher

On 05/02/19, at 9:40 am, Ms Beth Johnson (Teddy's class teacher) saw three equally spaced 1-inch marks on the right forearm of Teddy Davis (see body map) when Teddy rolled up their sleeves to paint a picture. The marks appeared to be cuts which had healed, due to the presence of a scab on each. The class teacher asked Teddy about the marks, and Teddy replied, 'I fell over'. The class teacher sent Teddy to the medical room to be seen by Ms Sally Brown (welfare officer). Ms Brown felt that the cuts were superficial, healing and required no medical attention.

The class teacher raised the concern with Mr Kurdziel, DDSL, verbally. DDSL asked for the concern to be recorded and requested that a phone call be made to the family to discuss observations about the marks and record discussion points on CPOMS. The class teacher recorded the concern and discussion points. DDSL will take action from this point as necessary.

Good practice Example

During lunchtime play today, Sarah approached me (Mrs Siobhain Conroy) and was crying. I asked her what the matter was, and she replied – 'I don't like my life anymore' I asked her why, and she replied – 'My mum and her boyfriend argue all the time. They always have cans of stuff which they drink. I really don't want to go home today because they are having a party tonight and that man will be there- you know that one....' I told Sarah that I did not know what man she meant, but when I said this, she ran off to play with her friends. I verbally passed on information immediately to DSL (Miss Kennedy) and also recorded the information on CPOMS.

Be Ready - Be Respectful - Be Safe - Be Responsible - Be Resilient - Be Courageous

Good Practice Example of Analysis by DSL

Mr Kurdziel, DDSL, having reviewed the information and first aid records, noted that this is the first occasion that Ted Day has been identified as presenting physical marks. Telephone call @11:10am. DDSL rang Ted's mum, who stated that Ted had slipped over on Saturday 03/09/22 in the kitchen on some spilt water and caught his arm on the corner of a kitchen worktop. Mum said that she was unaware that Ted had injured himself. Mum and Dad live together with Ted, their only child. Ted's attendance and punctuality are good(98.7%, no late marks). Mrs Johnson (class teacher) has no concerns about Ted, and contacts and interactions with the family have been positive and supportive. There are no previous reports of attendance for first aid. There are no concerns about Ted's behaviour in school.

Next Steps:

Having analysed the information and spoken to Ted's mother, there are no additional actions required at this time. Should further concerns be reported, this can be reviewed.

Appendix D - Relevant policies to be read in conjunction with this policy:

- Code of Conduct
- Filtering & Monitoring (including Acceptable Use of ICT within the school's Online Safety Policy)
- Safer Recruitment Policy
- Positive Behaviour Policy
- Anti-Bullying Policy
- School's policy on low-level concerns
- Educational Visits Policy
- Child-on-Child Abuse Policy and procedures
- Induction Pack for New Staff, inc. Part One of KCSiE

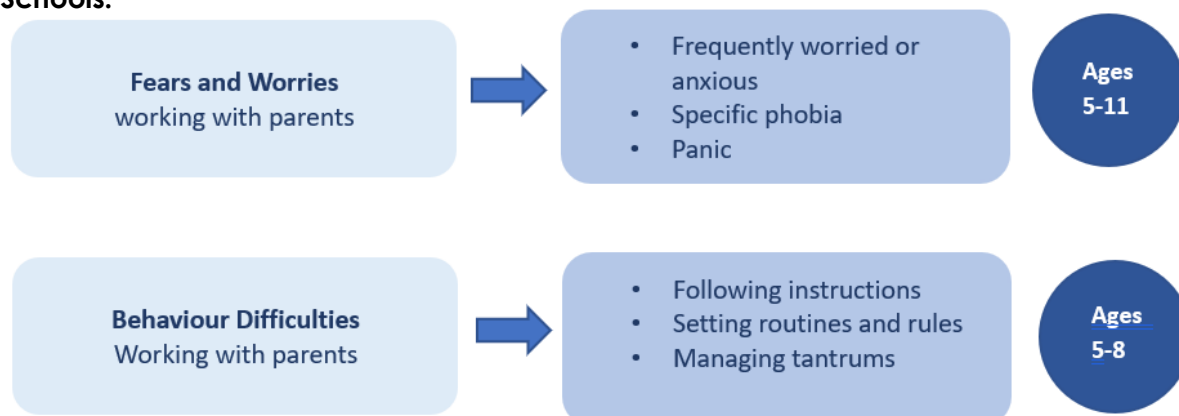
Appendix E

Referral Criteria:

MHST clinicians offer brief, focused, evidence-based interventions in the form of low-intensity support and guided self-help to children and young people who demonstrate mild/moderate:

- Anxiety (primary and secondary school age)
- Low mood (adolescents)
- Common behavioural difficulties (working with parents for under-8s)

Primary Schools:



MHST clinicians CAN DO	MHST clinicians MAY DO Discretion and close supervision	MHST clinicians CANNOT DO Significant need/complex condition
Low Mood / Mild to Moderate Depression	Self-harm is disclosed but is assessed as linked to low mood and is not assessed as enduring and high risk in nature	<ul style="list-style-type: none"> • Active, enduring and significant self-harm • Chronic depression, Eating Disorders, Bipolar disorder • Bereavement
Anxiety/ Worry or Panic Management	Mild social anxiety disorder, mild health anxiety	<ul style="list-style-type: none"> • Anxiety disorders including established health anxiety, PTSD
Separation anxiety/ fears/simple phobias resulting in avoidant behaviours	<ul style="list-style-type: none"> • Some compulsive behaviours • OCD – Early symptoms 	<ul style="list-style-type: none"> • Extensive phobias e.g. Blood, needles, or vomit phobia • Established OCD
Challenging automatic negative or unhelpful thoughts	Significant challenges related to low self-esteem/assertiveness	
Common behaviour difficulties – tantrums/ignoring instructions (primary school aged children only)	<ul style="list-style-type: none"> • Irritability as a symptom of anxiety or low mood • Interpersonal challenges (e.g., with peers) 	<ul style="list-style-type: none"> • Conduct disorder, anger Management • Complex interpersonal challenges • Relationship problems – Systemic Family Difficulties
Stress management/Problem solving		
Sleep problems	Insomnia	PTSD, trauma, nightmares
		Other complex mental health disorders including psychosis, personality disorders
		Historical or current experiences of abuse or violence
		Pain management