



Hedgewood School

Child Protection and Safeguarding Policy

Date policy last reviewed: October 2025

Signed by:

_____ Headteacher Date: _____

_____ Chair of governors Date: _____

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Statement of intent

Hedgewood School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out how Hedgewood School is carrying out its statutory responsibility to safeguard and promote the welfare of children in accordance with Section 175 of the Education Act 2002, Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023. It forms part of a wider group of policies around safeguarding children and puts the best interests of the child at the heart of a child centred and co-ordinated approach to safeguarding, ensuring inter-agency working and sharing of information is timely and effective. Hedgewood school complies with the arrangements agreed and published by Hillingdon Safeguarding Children Partnership and the National Police Chief's Council (NPCC) when to call the police guidance for schools and colleges.

Safeguarding and promoting the welfare of children is defined in guidance from Keeping Children Safe in Education (September 2025) 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 have the best outcomes.

Hedgewood school does not unlawfully discriminate against pupils because of their sex, race, disability, religion or gender reassignment (protected characteristics). We take positive action, where proportionate, to deal with the disadvantages that these pupils face in order to meet their specific need.

As a primary school for children with special educational needs or disabilities (SEND), the governors and staff at Hedgewood are acutely aware of the extra vulnerability of our pupils and that they may be more at risk of harm. Children with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers, and we recognise that additional barriers can exist when recognising abuse, exploitation and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges; and

- cognitive understanding – being able to understand the difference between fact and fiction in online content.

To address these additional challenges, Hedgewood school provides a diverse and enriching curriculum for all children with SEND and in particular autism and complex communication needs, with pathways dedicated to functional communication, independent life skills, and based on ensuring optimum quality of life experiences and opportunities for life-long learning and well-being. All staff have a safeguarding induction and undertake safeguarding and child protection training, including whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. Safeguarding and child protection training will be refreshed at least annually for all staff, and they will receive regular updates throughout the year via email, bulletins, bitesize training sessions and staff meetings.

Our staff are trained to nurture the individual needs of each child and we provide extra support through the provision of our Family Services Team who build trusting and empathetic relationships with our pupils and their families. We understand the importance of considering wider environmental factors in the lives of our pupils that may be a threat to their safety and welfare.

The staff and Governing Body of this school are committed to establishing and maintaining an environment where children feel secure, are encouraged to communicate, and are listened to. We will ensure that children know that there are adults in school who they can approach if they are worried, and promote a positive, supportive and secure ethos, to ensure all pupils feel respected and valued.

At Hedgewood school, we support our pupils to develop their self-knowledge, self-esteem and confidence. We encourage pupils to show respect and tolerance of others and develop understanding of right and wrong to fully promote fundamental British values, the rule of law and individual liberty. Understanding the social and communication needs of our pupils is paramount in supporting this through our adapted curriculums.

We have a child friendly version of this policy in every classroom for our pupils, and on our website for all our families, to explain in a simple way what keeping safe means, how to keep safe, and who pupils can talk to if they are upset or worried.

Aims:

- To ensure that there is a strong safeguarding culture within Hedgewood School
- To ensure that all necessary internal and inter-agency child protection procedures are in place as required
- To be committed to identify families who would benefit from Early Help
- To give training, regular updates and guidance to staff to ensure best practice
- To demonstrate the links with other relevant policies to safeguard the general welfare of children
- To provide a clear statement of the school's responsibilities in the event of a concern about the conduct of a member of staff
- To identify key individuals and their specific roles

1. Legislation and Statutory Guidance

This policy has due regard to relevant legislation and statutory guidance including, but not limited to, the following:

- Children Act 1989, 2004
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2025) 'Keeping children safe in education 2025'
- DfE (2024) 'Working together to improve school attendance'
- Section 175 of the Education Act 2002
- Statutory Guidance on Female Genital Mutilation (FGM)

2. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff (teaching and non-teaching), governors, volunteers, temporary and supply staff working in the school, and will be reviewed annually.

All staff

All our staff will read and understand Part 1 of Keeping Children Safe in Education (KCSIE) 2025 and annex B. Their understanding is evidenced by the completion of an online assessment or workshop quiz that covers the key elements of KCSIE Part 1.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the behaviour policy, the online safety policy, the role and identity of the designated safeguarding lead (DSL) and deputies, Hedgewood safeguarding flowchart, and the safeguarding response to children who go missing from education
- The early help process and their role in it, including sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, 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 child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), FGM, radicalisation and serious violence
- The risk of abuse or exploitation in situations outside of their families.

All staff are encouraged to remember that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL.

Teachers

Teachers have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

Governing Body

The governing body has a duty to:

- Facilitate a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Appoint a link governor for safeguarding [our link governor for safeguarding is Ami Johnson
- Have overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards are being met
- Evaluate and approve this policy at each review

Co-Headteachers

The Co-Headteacher's are responsible for the implementation of this policy. This policy will be communicated to parents / carers via the school website. The Co-Headteacher's will ensure that the DSL has appropriate time, funding, training and resources, and there is adequate cover if the DSL is absent.

Designated Safeguarding Lead (DSL)

The school has appointed a member of the senior leadership team Ayo Akinnola (Family Services Manager) as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection systems in school. The DSL takes lead responsibility for child protection and wider safeguarding in the school and is available all year round for staff to discuss any safeguarding concerns and to work in partnership with external agencies including health and social care. The DSL undergoes appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and any deputy DSL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

In the absence of the DSL, the deputy DSL's will act as cover. Our deputy DSL's are Diane Owens (Deputy Headteacher) and Jo Major (Senior Family Services Worker). At Hedgewood, all members of the senior leadership team are also DSL trained. Deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding 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 children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Make appropriate referrals where there is a child protection or safeguarding concern about a child
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

Our Designated teacher is Tara Shiki. The designated teacher has a responsibility for promoting the educational achievement of Looked After Children (LAC) and Previously Looked after Children (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care.

3. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. We work proactively and collaboratively with other professionals in other agencies and organisations in line with the framework of expectations outlined in Working Together to Safeguard Children statutory guidance. We are aware of and will follow local safeguarding arrangements.

The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing (and leading where appropriate) to multi-agency plans, such as Stronger Families Plans, to provide additional support.

4. Information sharing and confidentiality

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection

regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interest. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

Our DSL, deputies and DSL trained members in the senior leadership team will be able to keep detailed, accurate, secure records of concerns and referrals and understand the purpose of this record-keeping. All child protection and safeguarding concerns will be kept confidential and will only be reported to those necessary for its progression, and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

Safeguarding records are kept securely on our electronic Smoothwall Record Manager which is only accessible by our DSL, deputies and DSL trained members in the senior leadership team with their individual login and password.

Smoothwall Record Manager is GDPR compliant and is registered with the Information Commissioners Office (ICO). Their data centres all comply to the latest security standards. Any paper records are stored securely in a locked cabinet which is only accessible by DSLs.

When a pupil leaves Hedgewood school, the DSL will ensure their child protection file is transferred to their new school as soon as possible and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The government's 'information sharing advice for safeguarding practitioners' includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about information sharing.

5. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Hillingdon Councils Stronger Families Hub enables teams to intervene early and ensure that families have access to a wide range of support services around the clock. When early help is appropriate, the DSL will generally lead in liaising with other agencies, completing the early help assessment and writing and reviewing the Stronger Families Plan where necessary. All cases of early help will be kept under constant review and consideration given to a referral to Hillingdon Children's Social Care for assessment for statutory services if the pupil's situation is not improving or worsening.

6. Recognising abuse and taking action

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, in an institutional or community setting by those known to them or by others, and online. Hedgewood School will recognise that abuse or neglect of a child may occur through the

infliction of harm or through the failure to act to prevent harm. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

All staff, governors and volunteers must follow the procedures set out in this policy and our safeguarding flowchart when they have concerns about a child. Staff will complete a child protection / child concern form as soon as possible and notify the DSL immediately about their concerns. Staff will write down a factual report using the child's own words, what was said or seen, putting the scene into context, and giving the time and date.

Staff will be aware that children may not feel ready or know how to tell someone that they are being abused. For pupils who with speech, language and communication difficulties, staff will write down a factual report of what they are concerned about, clearly stating any observed behavioural changes or developmental regression where relevant.

Where appropriate, the DSL will discuss any concerns about a child with the child's parent or carer. However, if we believe that notifying the parent or carer would increase the risk to the child, the DSL will discuss this with children's social care before doing so. The DSL will record all concerns, decisions made and actions on our electronic Smoothwall Record Manager.

If a child is suffering or likely to suffer harm, or is in immediate danger a referral will be made to children's social care via Hillingdon Stronger Families Hub and / or the police. If the referral has not been made by the DSL, the DSL must be informed as soon as possible.

When a referral has been made to children's social care, the local authority will make a decision within 1 working day of a referral about what course of action to take and will let the referrer know the outcome. If the child's situation does not seem to be improving after the referral, the DSL (or person who made the referral) will escalate their concerns to the children's social care manager and / or seek advice from Hillingdon's Child Protection Lead for Education.

Staff can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Female Genital Mutilation (FGM)

KCSIE explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK, under the FGM Act 2003, and a form of child abuse with long-standing , harmful consequences. Our staff receive training to recognise the possible indicators that a pupil has already been subjected to FGM, and how to be alert to the potential need for early help for a child who's at risk of FGM. If staff have concerns that a pupil is at risk of FGM or suspects that FGM has been carried out, they will speak to our DSL as soon as possible and make a written record. Staff will not examine pupils. Hedgewood teachers are aware of their mandatory statutory duty to personally report known cases of FGM to the police by calling 101 and sharing information as outlined in the Home Office Guidance: Mandatory Reporting of Female Genital Mutilation – procedural information. A copy of the Home Office Guidance will be made available in the staff room.

So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM.

The Prevent Duty

As part of the Counter Terrorism and Security act 2015, schools have a duty to prevent people from being drawn into terrorism. This has become known as the 'Prevent Duty'. Protecting

pupils from the risk of radicalisation is part of our wider safeguarding duties. At Hedgewood school we will actively assess the risk of pupils becoming involved with or supporting terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to radicalisation into terrorism and act appropriately.

We follow the requirements in the Prevent guidance of the four general themes of; risk assessment, working in partnership, staff training and IT policies and practice.

If there is a concern that a child may be vulnerable to extremism or radicalisation, advice will be sought from Hillingdon Prevent Lead, and the National Prevent referral form will be completed where necessary.

We are aware of the potential risk factors for children (and young people) with autism and provide training and bulletins to our staff to raise awareness of how these risks can be mitigated. We recognise the vulnerability of not just our pupils but the wider family unit and we are alert to changes in behaviour in our pupils and family dynamics. School safeguarding procedures take into account local strategies and arrangements of Hillingdon Safeguarding Children Partnership. Prevent training is included in our yearly safeguarding training for all staff. Appropriate filters on internet access and vigilance on pupil use and understanding of online safety, protects children from exposure to extremist materials. Hedgewood is committed to working with parents / carers to understand the risk of online safety and effective monitoring of their children's use of technologies.

Mental Health

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

Staff will be alert to behavioural signs that suggest that a child may be experiencing a mental health problem or be at risk of developing one. Where staff have mental health concern about a child that is also a safeguarding concern, they will discuss their concerns with the DSL. If the mental health concern is not a safeguarding concern, staff can seek advice and support from one of our mental health first aiders.

At Hedgewood, we recognise that children with autism are more likely to experience mental health problems than the general population. Early intervention to identify issues and provide effective support is crucial. Our role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos;
- Identification: recognising emerging issues as early and accurately as possible;
- Early support: helping pupils to access evidence based early support and interventions; and
- Access to specialist support: working effectively with external agencies, to provide swift access or referrals to specialist support and treatment such as Child and Adolescent Mental Health Service for Learning Difficulties (CAMHSLD)

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. Hedgewood has robust and clear procedures for monitoring attendance and responding to absence. Procedures respond to repeated unauthorised absence and the school is alert to the risk of abuse or neglect. Our DSL is also our Senior Attendance Officer and works closely with our Attendance Officer to identify pupils where attendance is a concern.

We respond to unexplained absences on a daily basis, contacting parents / carers for an explanation of their child's absence. If a pupil is absent for an extended period (due to ill health or other explained reasons) even when school has an explanation, regular contact is made with the parent / carer by school.

The DSL will ensure that the relevant social worker is notified if there is an unexplained absence of a pupil who is currently subject to a child protection plan.

Hedgewood School shares daily attendance data with the Department for Education. Our DSL liaises with Hillingdon Virtual School and/or Attendance Support Team regarding attendance concerns for children with a social worker.

The school will inform the Local Authority children missing education (CME) team of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more. If a pupil is absent from school and their whereabouts is unknown, we will make reasonable enquiries to locate them; this may include calling emergency contacts and visiting the home address. Where the safety of a child is in doubt then a referral will be made to social care or the local Police.

Child on Child Abuse

For the purposes of this policy, "**child-on-child abuse**" is defined as abuse between children.

Hedgewood School recognises that our pupils with SEND, or certain health conditions, are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to bullying. To minimise any risk of child-on-child abuse and in accordance with the needs of our population, pupil interactions are monitored and supervised to promote positive social interaction. As the majority of our pupils are autistic, this is an integral part of each curriculum pathway to ensure that our pupils can keep themselves and their peers safe. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and not being reported.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

We aim to raise pupils' awareness and build their confidence and resilience so that they have a range of contacts and strategies to support themselves and others as far as possible. Development of self-awareness and keeping themselves safe is embedded in our curriculum pathways. The PSHE & Wellbeing curriculum, Relationships and Health Education (RHE) curriculum, SMSC curriculum, specific Social and Emotional development targets set in pupils Personal Learning Plans (PLPs) aim to support our pupils and families at the appropriate stage of their development.

We recognise that this type of abuse, which includes bullying, sexual violence and sexual harassment, upskirting and physical abuse, can happen inside and outside of school and

online, and can be part of a broader pattern of abuse. A zero tolerance of any form of bullying sits alongside our strong safeguarding culture which is rooted in mutual respect and trust.

Our positive relationships with both pupils and families ensure that any young person who has been subject to any form of child-on-child abuse, receives support to know they are valued, believed and their well-being is paramount. Our family services team work closely with parents to ensure pupils experiences within school enable them to feel safe and know that adults will support them.

At Hedgewood we foster an ethos of positive role models from adults to enable our pupils to interact and communicate with others in a caring and trusting manner.

Undesirable behaviour is challenged, and pupils are supported to develop positive engagement.

We have a child friendly version of this policy in every classroom which outlines to pupils who they can talk to if they are worried or upset. If a pupil reports an incident, staff will reassure the child that they will be supported and kept safe. The concern will be raised in line with our safeguarding flowchart and careful consideration will be made to support the victim and perpetrator, taking into consideration their individual special needs. Incidents will be recorded on Sleuth or Smoothwall Record Manager as appropriate.

Sexual violence and sexual harassment (SVSH)

SVSH can occur between two children of any age and sex. Reports of SVSH will be taken seriously and although we know that it is more likely that girls will be victims of SVSH and more likely it will be perpetrated by boys, all child-on-child abuse is unacceptable and will be taken seriously. Children's sexual behaviour exists on a wide continuum; problematic, abusive and violent sexual behavior is developmentally inappropriate and referred to as 'harmful sexual behaviour' and will be considered in a child protection context. When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors.

We will do all that we reasonably can to protect the anonymity of any children involved in any report of SVSH and consider the wishes of the alleged victim in terms of how they want to proceed while balancing our child protection and safeguarding duty and responsibilities. Where there is a report of a crime being committed (e.g sexual assault) we understand our duty to report this to the police. The police will take a welfare, rather than a criminal justice approach, in cases where the alleged perpetrator is under ten years old.

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

We are aware that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing. To safeguard and support the alleged perpetrator we will work with professionals as required to understand why a child may have abused a peer and consider the proportionality of our response to the allegation made against them.

In most cases, we will engage with both the alleged victim and the alleged perpetrators parent or carers when there has been a report of SVSH, unless there is reason to believe that this will put a child at additional risk.

Domestic Abuse

Hedgewood school will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children. Our staff are aware that domestic abuse:

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own relationships.

We are part of a joint agency project with Hillingdon Council and the Metropolitan Police called Operation Encompass, to support our pupils and their families who have experienced a domestic incident. Operation Encompass will ensure that our DSL is informed of the incident, so that we can offer discrete support for the family. We aim to provide a secure and caring environment to help reduce the broader effects of domestic abuse.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

Child Sexual Exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual and we recognise that children who may be sexually exploited may not understand that they are being abused, particularly children with SEND. Children with SEND who are being sexually exploited may express distress and confusion. It is vital to not assume that changes in behaviour are simple related to their special needs. CSE can also happen online, for example the child may be persuaded or forced to share sexually explicit images of themselves or take part in sexual activities using a webcam.

The school recognises the ongoing concern regarding the exploitation of children & young people especially in Hillingdon and the wider London area, including an increase in concerns regarding primary age children. We recognise the need for this school to be alert to the risk factors regarding different types of exploitation and youth violence and we know that early intervention is key in helping keep children & young people safe.

Our DSL and deputies attend Hillingdon exploitation awareness training and receive Hillingdon Axis Monthly Bulletins to keep them up to date on local information and trends regarding risks to young people. We have an understanding of CCE & county lines, CSE, Serious Youth Violence, gang affiliations/culture and missing episodes including current trends and themes in Hillingdon and nationally, signs & indicators for school staff to look out for and what to do. If a member of staff suspects CCE or CSE, they will discuss this with the DSL. The DSL will make referrals where appropriate.

Sharing of nudes and semi-nudes ('sexting')

All staff will follow the approach based on guidance from the UK Council for Internet Safety. If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images /videos, including pseudo-images, which are computer generated images that otherwise appear to be a photograph or video (also known as 'sexting') they will report it to the DSL.

Staff will not:

- View, copy, print, share, store or save the imagery themselves, or ask the pupil to share or download it
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff.
- Say or do anything to blame or shame any of the children involved.

The staff member will explain to the pupil in a way that they can understand that they need to report the incident and reassure the pupil(s) that they will receive support.

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

7. Online Safety

Online safety is an integral part of safeguarding. We have a whole school, cross-curricular approach, with collaboration between school leads, all staff, pupils, and parents. It is essential that children are safeguarded from potentially harmful and inappropriate online material. We aim to have an effective approach to online safety that empowers our school to protect and educate pupils, staff, and parents in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. It is a safeguarding priority as our pupils are known to be more vulnerable online and is detailed in our Online Safety policy.

Our approach to online safety is based on addressing the four categories of risk - Content, Contact, Conduct, Commerce. We also address misinformation, disinformation and conspiracy theories.

To meet our aims and address these risks we will:

- Educate our pupils about online safety in all curriculum pathways
- Train staff on online safety at induction and all staff to receive refresher training at least yearly
- Educate parent/carers about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone / devices
- Ensure everyone is aware of the acceptable use of internet in school, use of the school's ICT systems
- Put in place robust filtering and monitoring systems on the school's IT systems to reduce the risk of children being exposed to the four categories listed above
- Ensure that we meet the filtering and monitoring standards published by the DfE

Our DSL and IT technician review our filtering and monitoring procedures annually, and device checks are completed termly, to ensure that we effectively prevent access to harmful or inappropriate content. Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps we take to ensure harmful or inappropriate access is not made.

8. Looked after and previously looked after children

Looked after children (LAC) are defined as children who:

- Are provided with accommodation, for a continuous period of more than 24hrs under the Children Act 1989, sections 20 and 21
- Are subject to a Care order or Interim Care Order under the Children Act 1989, part 4
- Are subject to a placement order

Previously LAC (PLAC) are defined under the Children and Social Work Act 2017 as children who:

- Are no longer looked after by a Local Authority because they are subject of an adoption, special guardianship or child arrangement order; or were adopted from 'state care' outside England and Wales.

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously looked after children, also known as care leavers, can also remain vulnerable after leaving care.

We will ensure that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children safe. Appropriate staff have relevant information about children's looked after legal status and care arrangements. The DSL has details of children's social workers and relevant virtual school heads (VSH) / virtual school officers (VSO).

Where a LAC or PLAC has a social worker, this will inform decisions about safeguarding, e.g. responding to absence from education where being absent from education may increase known safeguarding risks within the family or in the community.

Hedgewood school is aware that strong multi-agency and multi-disciplinary working is vital to identifying and responding to the needs of LAC and PLAC. We have appointed a designated teacher, Tara Shiki – Assistant Headteacher, who is responsible for promoting the educational achievement of looked after children. The designated teacher will work closely with the DSL to ensure that any safeguarding concerns regarding looked after and previously looked after children are quickly and effectively responded to. The designated teacher will also work with the VSH / VSO to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans (PEP).

Personal Education Plan (PEP)

We are aware that all LAC must have a care plan, and that PEPs are an integral part of this care plan. We understand that the PEP is intended to serve as an evolving record of what needs to happen for a pupil to enable them to make the expected progress and fulfil their potential. The designated teacher will ensure that the pupil's Education Health and Care Plan (EHCP) works in harmony with their care plan and PEP to tell a coherent story of how the

pupil's needs are being met. We will ensure that each PEP reflects the importance of a personalised approach to learning which meets the identified educational needs of the pupil and will be reviewed termly.

9. Pupils who are gender questioning

When families/carers are making decisions about support for gender questioning pupils, they will be advised to seek clinical help and specialist advice.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and our pupils have wider vulnerabilities, such as autism and/or attention deficit hyperactivity disorder (ADHD).

We will consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

10. Safer recruitment

Hedgewood school's full policy and procedures for safer recruitment are outlined in our Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of Hedgewood staff have received appropriate safer recruitment training.

11. Allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk

of harm to children, and/or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be a one of the co-headteacher's or a member of the senior leadership team. Where a headteacher is the subject of the allegation, this will be the chair of governors. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused 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 there 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.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's personnel adviser and the local authority designated officer (LADO) Hannah Ives, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **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, or to cause harm to the subject of the allegation
- **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)

- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **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, record this decision and the justification for it and 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 considering what other support is appropriate, such as the Employee Assistance Programme for access to counselling.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that 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 Teaching Regulation Agency. Where the police are involved, wherever possible the school 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.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and

keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

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.

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 school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

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 child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

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, 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 child/children 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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these

for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other 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.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the LADO to determine whether there are any improvements to be made to our procedures 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

For all other cases, where the allegation concluded to be either, unfounded, false,

malicious or unsubstantiated we will consider the facts (alongside the LADO if they were involved) and determine whether any lessons can be learned and if improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

Whistleblowing

It is expected that staff who have concerns about poor or unsafe practice should follow our Whistleblowing Policy. Such concerns will be taken seriously by our senior leadership team who will act in accordance with procedures issued to all schools by the LADO.

A copy of our Whistleblowing Policy will be made available in the staff room and is issued to all new staff in their Welcome Pack. Staff are reassured that any allegations remain confidential and follow fair reporting procedures.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately and confidentially.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

Low level concerns will be shared with one of the co-headteachers. The headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct policy. Where appropriate this will be done in consultation with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1, we will refer it to the LADO
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

12. Monitoring and review

This policy is reviewed at least annually by the DSL and the Co-headteachers. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt, and approved by the full governing board.

Any changes made to this policy will be communicated to all members of staff.

