

# OMG Education Safeguarding Policy

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## KEY CONTACTS AT OMG

### FIRST POINT OF CONTACT FOR ALL SAFEGUARDING CONCERNS

NAME: JAMAL MIAH

CONTACT NUMBER: 07498 330 265

EMAIL: [jamal.miah@omgeducation.co.uk](mailto:jamal.miah@omgeducation.co.uk)

### DESIGNATED SAFEGUARDING LEAD

NAME: HELEN ROSE STRACHAN

CONTACT NUMBER: 0208 159 3838

EMAIL: [helen.strachan@omgeducation.co.uk](mailto:helen.strachan@omgeducation.co.uk)

### OUT-OF-HOURS SAFEGUARDING CONTACT

NAME: JAMAL MIAH

CONTACT NUMBER: 07498 330 265

EMAIL: [jamal.miah@omgeducation.co.uk](mailto:jamal.miah@omgeducation.co.uk)

## KEY CONTACTS WITHIN THE TOWER HAMLETS

Multi-Agency Safeguarding Hub (MASH)	020 7364 3444 / 5601 / 5606
To make a referral you need to complete the <a href="#">interagency form</a> .	
Police Child Abuse Investigation Team (CAIT)	020 8217 6484 (or use 999 if not available)
Contact Melanie Benzie for allegations against professionals, staff, or volunteers.	020 7364 0677 07903 238827 <a href="mailto:LADO@towerhamlets.gov.uk">LADO@towerhamlets.gov.uk</a>
Early Help select Option two. Open during weekday (excluding public holidays) from 9am and 5pm	020 7364 5006 (select option two)
Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards)	020 7364 5006 (Select option 3)

The Safeguarding in Education Service is able to provide advice and consultancy in non-emergency situations

[https://www.towerhamlets.gov.uk/ignl/health\\_social\\_care/children\\_and\\_family\\_care/child\\_protection.aspx](https://www.towerhamlets.gov.uk/ignl/health_social_care/children_and_family_care/child_protection.aspx)

The Tower Hamlets Local Safeguarding Partners (Tower Hamlets Safeguarding Children Board) can provide advice and training. The Local Safeguarding Partners within Tower Hamlets consist of; the Tower Hamlets Council, The Accountable officer for East London Integrated Healthcare, the Managing Director of the Tower Hamlets Clinical Commission Group CCG and the Tower Hamlets Metropolitan Police.

<https://www.towerhamlets.gov.uk/Documents/Children-and-families-services/THSCParrangements.PDF>

## REFERRAL TO LOCAL AUTHORITY SOCIAL SERVICES

If you feel that a child is at immediate risk of harm, please call the Police on 999, who will be able to provide an immediate response. Alternatively, you can contact your local Police on 101 at any time.

If you don't believe the risk requires immediate action, contact the Tower Hamlets Agency Safeguarding Hub team (previously the Referral and Advice Team) to discuss your concerns on:

Tel: 020 7364 5006 (Monday to Thursday, 9 am-5.15 pm and Friday, 9 am-5 pm)

Tel: 020 7364 5006 (Out of Hours).

You will get to speak to a social worker who is part of the Tower Hamlets Multi-Agency Safeguarding Hub (MASH) team. The social worker will need to gain as much information as possible about the child and the family.

If the young person does not reside in Tower Hamlets, contact their home borough social services.

## Core operational policies and procedures

### Purpose and Aims of this Policy

This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England must regard it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance, children include everyone under the age of 18. ([Keeping Children Safe in Education, KCSIE 2023](#)). KCSIE now applies to providers of post-16 education as set out by the Education and Training (Welfare of Children) Act 2021

*It is essential that everybody working in a school or college understands their safeguarding responsibilities. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play.*

### Aims

- Ensure safe recruitment practices in checking the suitability of all staff and volunteers to work with children, including completing risk assessments.
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns.
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that links with relevant agencies are effective, including working in partnership regarding child protection matters, including attendance at case conferences and core group meetings.
- Ensure the school environment is safe and is one in which pupils feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure pupils know there are adults in the school who they can approach if they are worried about anything.
- Ensure the curriculum and other provisions, including opportunities in the Health and Wellbeing/Personal, Social, Health and Economic Education (PSHE) curriculum, develop and equip pupils with the skills needed to feel safe and adopt safe practices
- Support for pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure staff follow accepted "safe practice" principles when working with pupils.
- Ensure pupils are protected from all forms of harm.

## **PART 1 Safeguarding Information for ALL Staff**

### **Induction and training**

- The head teacher/principal will ensure that all OMG Education (OMG) staff are fully inducted, are made aware of the following policies of OMG and that staff are fully aware of their role in implementing these:
  - Safeguarding and child protection policy and procedures (including information themes such as Child-on-Child abuse, contextual safeguarding, and Online Safety)
  - School Behaviour policy (including measures to prevent bullying, including cyberbullying, prejudiced-based and discriminatory bullying.)
  - Staff code of conduct (may also be known as staff behaviour policy) including low-level concerns, allegations against staff and whistleblowing.
  - Safeguarding response to children missing from education.
  - Role of the designated safeguarding lead and deputies
- Staff, including those not directly working with children, will be asked to confirm in writing that they have received, read, and understood all relevant staff policies, including “What to do if you are worried a child is being abused” guidance and ‘Keeping Children Safe in Education 2023 part 1’ or ‘Annex A’ (a condensed version of Part 1)
- The designated safeguarding lead will ensure that all OMG staff are fully inducted with regard to the OMG child protection procedures and that they receive safeguarding and child protection training on two yearly bases as a minimum. This will include online safety.
- The headteacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- OMG staff and governors will receive multi-agency safeguarding training at the appropriate level to their roles and responsibilities.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses.
- OMG staff will also receive training on Early Help and the Multi-agency Safeguarding Hub (MASH) safeguarding referral process as part of their safeguarding training. They will understand what the services are for and how to access support through them.
- OMG staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation (for example, via email, e-bulletins, and staff meetings).
- All OMG staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.



- All OMG staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.
- All OMG staff should be aware that children may 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.

## **Safeguarding children**

### **Safeguarding: is about every child.**

In relation to children and young people, safeguarding and promoting their welfare is defined in 'Working together to safeguard children as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in the circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

## **Early help cases**

- OMG staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:
  - Children with disabilities and additional needs, including those with special educational needs
  - Young carers
  - If the child has a mental health need.
  - Children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime.
  - Children who frequently go missing from home, school or care.
  - Children who are misusing drugs or alcohol.
  - Children at risk of exploitation through modern slavery and trafficking.
  - Children are at risk of being radicalised or exploited.
  - A family member in prison or is affected by parental offending.
  - Children whose home circumstances are negatively affected by adult substance misuse or mental ill health, or domestic abuse.
  - Misusing drugs or alcohol themselves.
  - Children who have returned home from care.
  - Children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low-level neglect.
  - Is at risk of honour-based abuse such as Female Genital Mutilation or forced marriage.
  - Is persistently absent from education.
  - Privately fostered children.

- Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the OMG Designated Safeguarding Lead (DSL).
- If the child requires an early help service from another agency, the OMG DSL will make a referral to the MASH for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.
- Where the child is receiving an Early Help service, the OMG DSL will work as part of the Team Around the Child/Family and take up the role of lead professional where this is appropriate.
- Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the OMG DSL believes that this is not the case, consideration should be given to making a referral for a statutory social work service.

### **Child Protection: those at risk of significant harm**

OMG will carry out its duty to safeguard pupils, which is:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring children are growing up in the circumstances consistent with the provision of safe and effective care
- undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.

Action may be needed to protect children and learners from specific safeguarding issues such as:

- Abuse: Neglect, physical, sexual and emotional
- Disguised compliance
- Children missing in Education (CME)
- Children who are home-schooled ('Hidden Children')
- Radicalisation / extremism
- So-called 'Honour Based' Abuse (HBA)
- Breast Ironing
- Mental health concerns, including self-harm
- Bullying, including online (cyber) bullying and prejudice-based bullying
- Racism, disability, homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- Domestic Abuse
- Poor parenting
- Child sexual exploitation and trafficking (CSE)
- The impact of new technologies on sexual behaviour
- Substance misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Fabricated or induced illness
- Faith abuse

- Gangs and youth violence (including Child Criminal Exploitation: County Lines)
- Private fostering
- Sexting (Youth Produced Sexual Imagery)
- Child-on-child abuse
- Teenage relationship abuse
- Serious Violent Crime
- Sexual violence
- Sexual harassment
- Children with family members in prison
- Children and the court system
- Homelessness
- Adverse Childhood Experiences (ACEs)
- Trauma and Attachment issues
- Up-skirting
- Knife Crime
- County Lines
- Modern Slavery
- Cybercrime

OMG DSL will seek advice from the MASH Professionals' Consultation Line to help make decisions on the child's level of need and the appropriate service to refer to for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

All referrals for a children's social care service will be made by way of the MASH [Safeguarding Referral Form](#).

Parental consent for a referral will be sought unless advised not to by a member of the MASH team, specifically linking to allegations of sexual abuse, concerns of fabricated or induced illness or the parent is the alleged perpetrator, but a referral will be made regardless of consent being given in cases where the child is at risk of significant harm.

Staff will also share information and work in an integrated way to ensure a coordinated response from agencies to support families and meet the child's needs.

### **Referral for a statutory social work service**

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead, or their deputy are most likely to have the most complete safeguarding overview. Following consultation, the designated safeguarding lead should decide on whether to make a referral to children's social care via MASH. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges 19 provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Additional information is available here: [Contextual Safeguarding](#).

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Tower Hamlet's MASH team to gather relevant information from other agencies.

MASH will inform the school/college of the outcome of any referral and what action children's social care will be taking. This may include any of the following:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a child in need under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a strategy meeting/discussion under child protection procedures as set out in section 4 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.
- Providing interim services for the child and their family in the meantime whilst work is ongoing (including details of appropriate services).

### **Children who need a Social Worker**

Children may have a social worker due to neglect, abuse or difficult family circumstances. Their experience can leave them vulnerable to further harm, and we have a duty as professionals to help protect them. The local authority should communicate with the designated lead so they know if a child has a social worker and therefore enable them to make decisions which are in the best interest of the child's safety, welfare and educational outcomes.

Further documents which may assist in supporting these families can be found in the [Review of Children in Need. Help, Protection, Education](#) concludes the review.

### **Child protection procedures**

OMG will work on the following policy documents in order to support the protection of pupils who are at risk of significant harm.

- [Working together to safeguard children](#)
- [What to do if you're worried a child is being abused](#)
- [Keeping Children Safe in Education](#)
- [Tower Hamlets Child Protection](#)
- [London Procedures](#)

In line with these policies and procedures, OMG will:

- Identify those pupils where there are child protection concerns and make a referral to MASH.
- Attend child protection case conferences in order to effectively share information about risk and harm.
- Contribute to the development and monitoring of child protection plans as a member of the core group.

- Carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing, and liaising with the allocated social worker as required.

## Recognition

- All OMG staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the DSL.
- Staff should refer to Annex 3 for abuse indicators that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the DSL, and advice sought on what action should be taken. Where required, advice can be obtained from the MASH Professionals Consultation Line on a no-names basis.
- Concerns may be monitored over time and should be recorded on a monitoring/incident form shown, such as the example in Appendix 2, or logged on MIS. Details of any concerning incidents should also be recorded in this way.
- All OMG staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- All OMG 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 OMG staff should be aware that technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse and other risks online as well as face-to-face.

## Records

- Safeguarding monitoring records and Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the OMG MIS System.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on the safeguarding monitoring/incident area of MIS, highlighting dates, times, and who recorded the entry.
- MIS records should show:
  - What the concerns were.
  - Whether information of the concern was shared with the parent and what their response was.
  - What action was taken to refer on concerns or manage risk within OMG.

- Whether any follow-up action was taken.
  - How and why decisions were made.
  - Outcomes
- 
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken and the outcomes.
  - The monitoring/incident form must be completed.
    - Whenever concerns arise, or there is a serious incident or
    - where a child is being monitored prior to a case conference or core group meeting.
  - When a child who transitions to a new educational provision, the master file is passed to the designated safeguarding lead at the new school, transferred securely and confirmation of receipt is obtained. Designated Leads should also consider if there is a need to share any key information about the family ahead of their start date. This may assist the new school in planning appropriate support for the family.
  - A copy of the child protection & safeguarding file should be retained by the school and kept in line with the school's information retention schedule. Child protection & safeguarding records must be disposed of as confidential waste.

### **Dealing with disclosures**

If a pupil discloses to a OMG member of staff that they are being abused, the OMG member of staff should:

- Listen to what is said without displaying shock or disbelief and accept what the child is saying.
- Allow the child to talk freely.
- Reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to children's social care.
- Reassure the child that what has happened is not their fault and that they were right to tell someone.
- Not ask direct questions but allow the child to tell their story.
- Not criticise the alleged perpetrator.
- Explain what will happen next and who has to be told.
- Make a formal record using OMG MIS and immediately alert the designated safeguarding lead in person.

### **Do Not Delay**

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this – do not leave notes for Designated Safeguarding Lead as they may not get back to check their post until the end of the day once the pupil has gone home.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious.

- When the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult the MASH.

### **Make Written Notes**

- At the earliest opportunity, make a written record of your concerns; these can then be added to OMG MIS - record facts accurately and do not express an opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.
- Do not take photographs of any physical injuries; record them on a body map. Do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using MIS.

### **Referral**

- Where possible, a decision on whether or not to refer a pupil to MASH should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral, and any member of staff may make a referral if this is necessary, but staff should discuss the matter with a member of the senior management team and take advice from the MASH team social worker. The designated safeguarding lead should be informed as soon as possible.
- Referrals should be in writing using a MASH safeguarding referral form completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the MASH safeguarding referral form within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with the MASH Professionals’ Consultation Line to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made unless seeking consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- If the child already has an allocated social worker, the referral should be made directly to them. If the child is not already known to children’s social care, referrals should be made to MASH. If the child lives outside Tower Hamlets, a referral should be made to their home local authority.
- All referrals will be acknowledged by the MASH, and the referrer will be informed of what action will be taken.
- If OMG does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with children’s social care via the designated safeguarding lead.

## **Attendance at Case Conferences, Core Groups and Child in Need Meetings**

- The designated safeguarding lead will liaise with children’s social care to ensure that all relevant information held by the school is provided to children’s social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that OMG is represented at child protection case conferences and core group meetings:
  - where possible, a member of staff who knows the child best, such as a class teacher or head of the year, will be nominated to attend
  - failing that, the designated safeguarding lead or their deputy will attend
  - If no one from OMG can attend, the designated safeguarding lead will ensure that a report is made available at the conference or meeting.

## **Monitoring**

Where a pupil is the subject of a child protection plan, and OMG has been asked to monitor their attendance and welfare as part of this plan.

- Monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead.
- All information will be recorded on the child protection monitoring/incident area of MIS prior to each conference and core group meeting.
- The completed monitoring form will be kept on the pupil’s separate child protection file (that should be separate from the school record), and copies will be made available to all conferences and core group meetings.
- The designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

## **Confidentiality and Information Sharing**

*[KCSIE 2023](#) tells us that: The Data Protection Law does not prevent the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.*

**Further information on information sharing can be found:**

- [Working Together to safeguarding children](#)
- [Information Sharing: Advice for Practitioners](#)
- [Information Commissioner’s Office](#)
- [Data Protection Toolkit for Schools](#)



- All information obtained by school staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have a sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act. Otherwise, consent should be sought from parents.
- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with children's social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by children's social care.
- Parental consent to making a child protection referral should be sought, but if withheld, the referral must still be made, and parents must be made aware of this. Before taking this step, OMG should consider the proportionality of disclosure against non-disclosure. Is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the MASH Professionals Consultation Line on a "no names" basis to gain advice on whether this course of action should be taken.
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.
- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school/college's duty to share information.
- OMG staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the MASH Professionals Consultation Line.

### **Working with Parents and Carers**

OMG recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

OMG will:

- Make parents aware of OMG's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by having a safeguarding statement on the home page of their website and making all OMG policies available on the OMG website or on request.

- Provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff.
- Consult with and involve parents and carers in the development of OMG policies to ensure their views are taken into account.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- Provide advice and signpost parents and carers to other services and resources where pupils need extra support.
- Schools should also be aware of the additional guidance available from the DfE on dealing with issues around parental responsibility: [Understanding and dealing with issues relating to parental responsibility](#).

### Multi-agency Working

- OMG will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and Working together to safeguard children 2018.
- OMG recognises its vital role in safeguarding school-age children and will co-operate with the Tower Hamlets Safeguarding Children Team to ensure joint working with partner agencies in order to improve outcomes for children in Tower Hamlets.

### Inspection

- Since September 2019, Ofsted's Inspection of schools, early years and Post-16, inspectors will judge whether establishments are effective in their provision of safeguarding. [Ofsted Education Inspection Framework](#). Additional guidance for Early Years is available here. Independent schools are inspected through the Independent Schools Inspectorate (ISI), and their inspection framework can be found [here](#).

### Safeguarding Issues

*The Law – [KCSIE 2023](#) Page 24 sets out legal requirements around safeguarding. These include:*

- [The Human Rights Act 1998](#)
- [Equality Act 2010](#)
- [Equality and Human Rights Commission](#)

### Child-on-Child abuse

Child-on-child abuse is where a pupil's behaviour is likely to cause significant harm to other pupils. This is most likely to include, but not limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

- Sexual violence and sexual harassment.
- Gender-based violence.
- Sexting (also known as youth-produced sexual imagery).
- Initiation/hazing type violence and rituals.
- Upskirting (typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019)

This type of abuse should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example, include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The school will refer the perpetrator and the victim to children’s social care via MASH.

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

Schools and colleges (including 6th forms) should respond to all reports and concerns of a child on child sexual violence and sexual harassment, including those that have happened outside of the school or college premises and or online (what to look out for, and indicators of abuse are set out in Part one KCSIE 2023).

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to college age. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of ‘it could happen here’ and know OMG have ZERO Tolerance to child-on-child harassment, abuse and violence.

Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable.

### **Sexual Violence**

When referring to sexual violence, we are referring to sexual offences under the Sexual Offences Act 2003. Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent are crimes. (Definitions of categories can be found on page 104 [KCSIE 2023](#)). Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the school or online, but involved pupils from the school, the school’s duty to safeguard pupils remains the same.

The designated safeguarding lead (or deputy) should ensure they are engaging with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

### **Consent**

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

time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Further information on consent can be found [here](#).

## **Sexual Harassment**

[KCSIE 2023](#) tells us that when referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Examples include:

- Sexual comments
- , sexual “jokes”, or taunting
- physical behaviour, such as: deliberately brushing against someone or interfering with someone’s clothes.
- displaying pictures, photos or drawings of a sexual nature
- upskirting and
- online sexual harassment. Further examples can be found on page 106, [KCSIE 2023](#).

## **Harmful Sexual Behaviour**

This is where sexual behaviour ranges from developmentally ‘normal’ to inappropriate, problematic, abusive and violent. Harmful Sexual Behaviour HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in [KCSIE 2023](#), Page 107

## **Policy**

- OMG recognise that sexual violence and sexual harassment between pupils is a serious safeguarding issue, and such behaviour will not be tolerated. OMG behaviour management and anti-bullying policies will reflect OMG’s approach, and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- OMG will follow the statutory guidance on Sexual violence and sexual harassment between pupils and will work with relevant agencies to safeguard and support victims, take appropriate action

against alleged perpetrators and ensure a safe learning environment for all pupils. For further details, please see [Sexual Violence and sexual harassment between children in schools and colleges](#).

- OMG will take all necessary steps to put in place a planned PHSE curriculum to convey OMG's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regard to sexual conduct. OMG will also make close links to the [new Relationships Education Curriculum](#), which is compulsory for all schools from September 2020.
- OMG will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by OMG, and appropriate referrals will be made to the police and children's social care.
- OMG will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguard the welfare of all pupils and staff.
- It should be noted that ALL reports of sexual harassment and violence should be taken seriously, but staff need to be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with additional needs are three times more likely to be abused.
- OMG will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

## Procedures

- Not all children will directly tell a member of staff about their experience and OMG staff need to know how to respond when overhearing a conversation or if they notice a change in the child's behaviour. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing.
- OMG will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the [Keeping children safe in Education statutory guidance](#).
- Governing bodies and proprietors should ensure that the school contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the OMG environment. Toolkits that will support the risk assessment process include [Brook: traffic light tool](#).
- Where the allegation involves material posted online, OMG will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance [Searching, screening and confiscation guidance](#) and [UKCIS Sexting in schools and colleges advice](#).

- The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable and informs the designated safeguarding lead (or deputy) as soon as practically possible if the designated safeguarding lead (or deputy) is not involved in the initial report.
- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider the victim, especially their protection and support, the alleged perpetrator(s) and all the other children (and, if appropriate, adult students and staff) at OMG, especially any actions that are appropriate to protect them.
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the school will respond to the incident.
- The designated safeguarding lead may take advice from MASH Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police or managing the matter internally under OMG behaviour policies.
- Where a referral will be made to children's social care or the police, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion, a decision will be made on whether and how to inform the alleged perpetrator and their parents.
- KCSIE states that Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on OMG's initial response. Important considerations will include the wishes of the victim in terms of how they want to proceed. This will, however, need to be balanced with OMG's duty and responsibilities to protect other children. The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. The ages of the children involved. The developmental stages of the children involved. Any power imbalance between the children. If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse, and a sustained pattern may not just be of a sexual nature). That sexual violence and sexual harassment can take place within intimate personal relationships between peers. Are there ongoing risks to the victim, other children, adult students or school or college staff. And other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- OMG will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in light of ongoing police and children's social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, OMG will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.

- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will “take sides” following a report, and OMG will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The school will keep in mind that contact may be made between the victim and the alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- The [National Organisation for the Treatment of Abusers \(NOTA\)](#) provides support for professionals involved in work with or related to sexual offending.
- OMG will consult with Part 5 KCSIE 2023 (specifically pages 110-115) when managing allegations of child-on-child sexual harassment or sexual violence. OMG will consider the 4 likely scenarios when managing reports of incidents
  - Manage internally
  - Early Help
  - Referral to Children’s Social Care
  - Report to Police
- Risk assessing (479), safeguarding and supporting victims (530), Safeguarding and supporting the alleged perpetrator (540), disciplining alleged perpetrators (543) and safeguarding other children (552) can all be advised through the relevant paragraphs in KCSIE 2023.
- OMG will refer to paragraphs 527-529 with regard to unsubstantiated, unfounded, false or malicious reports and fully follow the recommendations/guidance of recording information and what to do when the report is found to be unsubstantiated, unfounded, false or malicious.

### **What to do if you are informed that a parent is on the sex offender register**

In this situation, the head teacher will be guided by parole conditions where relevant to keep children safe in school. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

### **Additional procedures**

Individual schools should record any additional procedures here or refer to any separate policies.

- Sexual violence is defined as any act which is an offence under the [Sexual Offences Act 2003](#), including rape, assault by penetration or sexual assault without the consent of the victim.
- Sexual harassment is defined as unwanted sexual conduct likely to violate the victim’s dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, and physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.
- When dealing with incidents, OMG should ensure that the written report of the incident contains objective facts and sets out clearly the next steps to be taken, with the views of the victim clearly recorded.



- OMG should be aware of their equality duty as victims of sexual violence and harassment are more likely to be female but should follow the same procedures and ensure the same level of response for incidents involving male pupils or incidents where the victim and perpetrator are the same sex.
- Cases may be managed internally by OMG without referral to other agencies where the incident involves low-level concerns and is a “one-off” occurrence where there is no further risk to the victim or other pupils.
- OMG should give careful thought to the day-to-day management of risk and support for the victim, taking into account the victim’s views when considering practical issues such as separating the victim and perpetrator. However, OMG must be able to justify any measures taken and ensure that they do not interfere with the educational opportunities of either party.
- Schools may wish to consider developing specific policies around responding to incidents of sexual violence and harassment towards staff members.
- OMG will ensure that staff and governors are able to take up training and support around relationships and child-on-child abuse and how these messages should be delivered within the PSHE curriculum.
- Sexual violence and harassment will also be addressed in general, with designated safeguarding leads receiving more intense training in view of their role.

### **Contextual safeguarding for young people**

OMG is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at OMG or from their own peer group. Protecting children from these external risks is known as contextual safeguarding.

School safeguarding policies must therefore reflect the needs of young people in their own communities. (Please see the OMG’s annexe to this policy).

Schools/colleges act as a protective factor in children’s lives. Children who do not attend can become hidden, which means that schools/colleges are less able to help and protect them. Children who do not attend school may be at further risk of not achieving their educational potential. This could include the following groups.

- Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.
- Children who fall under the heading ‘educated at home’, but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
- Children are attending unregistered schools, sometimes under the guise of being electively home-educated.
- Children in an alternative provision that is of insufficient quality or is not provided for the required hours.
- Children without a school place in Local Authority (LA) in which the protocols are not working well enough for hard-to-place children.



## **Children who run away/go missing**

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If a school becomes aware of a child who is missing from home or care and that child has not been reported missing to the police, they should do so using 101.

Running away may be an indicator of other problems, and therefore referral to MASH should be considered. Early intervention after the first episode may prevent a child from being exploited. For further information, please see [Children who run away or go missing from home or care.](#)

## **Child criminal exploitation – county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploited even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females and young people or adults.
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, cognitive ability, physical strength, status and access to economic or other resources.

If you become aware of a child or young person who may be at risk, a referral should be made to MASH.

Further guidance:

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of Children and vulnerable adults: County Lines guidance](#)

*KCSIE 2023 states: 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 misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>9</sup> can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:*

## **Children at risk of Sexual Exploitation (CSE)**

Both Child Criminal Exploitation and Child sexual exploitation is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 in sexual or criminal activity:

- a) in exchange for something the victim needs or wants, and/or
- b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with males or females, adults or children and can be a one-off event or a series.

Criminal and sexual exploitation of females can present differently in girls to boys as well as potential indicators.

### **The three main types of child sexual exploitation:**

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. It can also occur through the use of technology.

- **Inappropriate relationships:** Usually involve just one abuser who has inappropriate power, physical, emotional or financial control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- **Boyfriend/girlfriend:** Abuser grooms a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.
- **Organised exploitation and trafficking:** Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc., without plausible explanation.
- Gang association and/or isolation from peers/social networks.
- Exclusion or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequent areas are known for sex work.
- Concerning the use of the Internet or other social media.
- Increasing secretiveness around behaviours. and
- Self-harm or significant changes in emotional well-being.

### **Potential vulnerabilities**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

If a school becomes aware of a child that may be being sexually exploited, they should refer to MASH.

Further guidance:

[Child sexual exploitation: definition and guide for practitioners](#)

### **Serious Violent Crime - people at risk from gang activity or serious youth violence**

Schools/colleges are a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities.

Staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include:

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These may indicate involvement or approach by criminal networks or gangs.

OMG staff need to be alert to the possibility of children and young people bringing weapons onto their site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person.

Further guidance:

[Preventing youth Violence and Gang Involvement](#)

## **Domestic abuse and/or sexual violence**

Exposure to domestic abuse can have a significant impact on children’s emotional development and mental health. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first-ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children as victims in their own right if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over, and they must be “personally connected” (as defined in section 2 of the 2021 Act).

## **Operation Encompass**

Tower Hamlets is part of the Operation Encompass service, which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child’s circumstances and can enable immediate support to be put in place according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass](#) website. (KCSIE 2023)

## **National Domestic Abuse Helpline**

Refuge runs the [National Domestic Abuse Helpline](#), which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Schools should refer young people who are victims of domestic or sexual violence to MASH.

Further advice and guidance can be obtained from the Multi-Agency Safeguarding Hub, which can be contacted by phoning their helpline at Tel: 020 7364 5006 option 3 or by emailing [Mash@towerhamlets.gov.uk](mailto:Mash@towerhamlets.gov.uk).

**Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:**

- [NSPCC: UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge: what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- <https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations/domestic-abuse-specialist-sources-of-support>(includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

- [Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

Specific guidance on adolescent-to-parent violence and abuse is published by the [Home Office Adolescent to parent violence and Abuse \(APVA\)](#)

## **Prevention of Radicalisation and Extremism**

OMG's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

For further information, please see: [Promoting fundamental British values as part of SMSC in schools.](#)

Under Counter-Terrorism and Security Act 2015, the school/college also has a duty to refer young people to [Tower Hamlet's Prevent Team](#) under the Prevent strategy where there are concerns that they are being radicalised.

For further information, please see [The Prevent Duty.](#)

If OMG staff have concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies or that a younger pupil may be at risk due to their parent's radicalisation, the school/college should make a referral to MASH using the [MASH Safeguarding Referral Form.](#)

## **Risk indicators of vulnerable pupils**

### **Indicators of an identity crisis include the following:**

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

### **Indicators of a personal crisis include the following:**

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

### **Indicators of vulnerability through personal circumstances include the following:**

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

### **Indicators of vulnerability through unmet aspirations include the following:**

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life

- Indicators of vulnerability through criminality
- Experiences of dealing with the police
- Involvement with criminal groups

**Critical indicators include where the pupil is:**

- In contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Making significant changes to their appearance and/or behaviour

**When making a judgement, staff may consider the following questions:**

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities?
- Has the pupil witnessed or become the victim of racial or religious hate crimes?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Is there a pattern of regular or extended travel within the UK?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?
- Is the pupil the victim of social isolation?

[Educate Against Hate](#), a website launched by His Majesty's Government, has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British Values) to help recognise and address extremism and radicalisation in young people.

[Channel](#) is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

*Schools should always be a safe space for young people to explore new ideas and perspectives and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered, the school/college should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.*

*OMG's designated safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral, the school may also speak to and get advice from Tower Hamlet's Multi-Agency Safeguarding Hub Professionals.*

## **Mandatory reporting of Female Genital Mutilation (FGM)**

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK. FGM typically takes place between birth and around 15 years old. However, it is believed that the majority of cases happen between the ages of five and eight.

### **Risk factors for FGM include:**

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

### **Indications that FGM may have already taken place may include:**

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

OMG staff will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM.

Where a pupil makes a disclosure of FGM, OMG will follow the mandatory reporting rules and make appropriate referrals to the police and MASH.

Further Guidance:

[Multi-agency statutory guidance on female genital mutilation](#)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation FGM (mentioned above), forced marriage, and practices such as breast ironing.

**Breast Ironing** is practised in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them from growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape,



kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

If OMG staff become aware of a child that may be at risk of forced marriage, they should, in the first instance, MASH. If a child is at immediate risk, they should contact the police.

Further advice on forced marriage can be obtained from the [Foreign and Commonwealth Office's Forced Marriage Unit](#) by phone at 0207 008 0151 or by emailing [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

Further Guidance:

[Forced Marriage: a survivor's handbook](#)

All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#).

### **Children Requiring Mental Health Support**

Schools and colleges play a key role in supporting the emotional health and well-being of pupils. In some cases, mental health can be an indicator of abuse, and all provisions should have clear procedures on how to access the appropriate support for these children.

More information can be found in the [mental health and behaviour in schools guidance](#). Children who have experienced abuse and Adverse Childhood Experience (ACEs) through traumatic events are likely to be impacted. Only appropriately trained professionals should make a diagnosis. The Additional documents listed below may also assist in supporting children and young people. See [Rise Above](#) for links to all materials and lesson plans.

### **Online Safety**

As part of their duty to provide a safe learning environment, OMG will ensure their pupils know how to remain safe online.

There is considerable risk to children online, but they can be categorised within these three areas as stated within KCSIE:

#### **Content:**

Being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogynistic, self-harm, suicide, anti-Semitism, radical and extremist.



**Contact:**

Being subjected to harmful online interaction with other users. For example, peer-to-peer pressure, commercial advertising and adults posing as children or young adults for the purposes of grooming children. and

**Conduct:**

Personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images, sharing others explicit images and online bullying.

**Commerce:**

Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students, or staff are at risk, please report it to the [Anti-Phishing Working Group](#).

The DfE published [Teaching Online Safety in Schools](#), identifying the importance of including reporting and acting on online safety concerns within the Child Protection Policy, school behaviour policy and bullying policy.

Governing bodies and proprietors should be doing all that they reasonably can limit children’s exposure to the above risks from the school’s IT system.

Pupils should be just as clear about what is expected of them online as offline. A recommended framework published by [UK Council for Child Internet Safety \(UKCCIS\)](#) supports the delivery of online safety.

Further Guidance:

[Educated for a Connected World](#)

OMG is aware that some pupils may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, children’s social care or other agencies in order to overcome problems or keep them safe.

Educating children and young people to stay safe online is crucial in the modern world.

Other websites that can assist are:

- [Be internet legends](#)
- [PSHE Association](#)
- [ThinkUKnow](#)
- [Safer Internet Centre](#)
- [360 Safe Website](#) has a free online self-assessment tool for schools.

**Remote Learning**

Where children are being asked to learn online at home, the Department has provided advice to support schools and colleges in doing so safely: safeguarding in schools, colleges and other providers and safeguarding and remote education.

The NSPCC and PSHE Association also provide helpful advice:

- [NSPCC Learning - Undertaking remote teaching safely during school closures](#)
- [PSHE - PSHE Association coronavirus hub Filters and monitoring](#)

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can limit children's exposure to the above risks from the school's IT system. As part of this process, governing bodies and proprietors should ensure their school has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems is a matter for individual schools and colleges and will be informed, in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published [guidance as to what "appropriate" filtering and monitoring might look like](#).

Support for schools when considering what to buy and how to buy it is available via the: [schools' buying strategy](#) with specific advice on procurement.

Education settings are directly responsible for ensuring 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 e-security is available from the [National Education Network](#). In addition, broader guidance on cyber security, including considerations for governors and trustees, can be found on [NCSC](#) website.

## Cybercrime

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

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example, accessing a school's computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDoS) attacks or 'booting'. Attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources. and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy) should consider referring to the [Cyber Choices programme](#). This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing or being drawn into low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crimes such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

Additional advice can be found at:

[NPCC- When to call the Police](#)  
[National Cyber Security Centre](#)

### **Looked after and Previously Looked After Children (LAC) and Care Leavers**

OMG recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

OMG's designated teacher for LAC and care leavers has specialist knowledge of the issues faced by this cohort, and for this reason, the designated safeguarding lead will consult with the designated teacher to seek advice whenever there are concerns about the welfare of a looked-after or previously looked after child or care leaver.

More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked After Children](#).

### **Children who are lesbian, gay, bi, or trans (LGBT)**

Children being LGBT is not a safeguarding concern in itself, but it is important to be aware that they can be targeted by others. This can increase the vulnerability of these children. It is important to consider helping LGBT children to identify a trusted adult who they can talk to, as well as provide safe places within school to talk about their concerns.

LGBT inclusion is part of the [Relationships Education and Relationships and Sex Education curriculum](#). There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

### **Children with Special Education Needs and Disabilities (SEND)**

OMG is aware that children with special education needs may be more vulnerable to harm and abuse and may be more likely to experience bullying.

They can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse, such as behaviour, mood and injury, relating to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs.
- Difficulties may arise in overcoming communication barriers.
- There may be a higher risk of peer group isolation.

OMG policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. OMG will identify pupils who might need more support to be kept safe or to keep themselves safe.

### **Privately Fostered Children**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent but is a 'close relative' for 28 days or more. Schools have a legal duty to notify Tower Hamlets

of any pupils they know to be private fostered. Designated safeguarding leads should refer to MASH for any private fostering arrangements that come to their notice.

### **Why are children in Private Foster Care?**

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents have moved away, but the child stays behind (e.g. to stay at the same school to finish exams)
- teenagers living separately from their own family
- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families

### **Are children in private foster care defined as ‘Looked after Children’?**

No. The term ‘Looked after Children’ means children who are looked after by the local authority. Privately fostered children are outside the care of the local authority. Schools should not, therefore, code children in private foster care as ‘LAC’.

### **Children staying with host families (homestay)**

Some schools and colleges make arrangements for their pupils to have learning experiences by staying with a ‘host family’ who are not related. It can be part of a foreign exchange visit and is known as a ‘homestay’ arrangement. Appendix E of KCSIE 2023 has further definitions around this. In some cases where the family is within the UK, this could amount to private fostering under the Children’s Act 1989 (see above).

### **Young Carers**

If schools have concerns about a pupil they believe to be a young carer, they can contact the [Young Carers Service](#) at 07985 607 928.

### **Fabricated or Induced Illness**

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child’s biological mother, exaggerates or deliberately causes symptoms of illness in the child.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being evicted from a property. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

## **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes, including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children to help mitigate negative consequences for those children.

## **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and there are two age-appropriate guides to support children:

- [Going to court \(5 to 11-year-olds\)](#)
- [Going to court and being a witness \(12 to 17-year-olds\)](#)

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

## **Children who are missing from education (CME)**

Schools need to be aware of those children who are persistently absent or missing from school, as this may be an indicator of welfare concerns.

Attendance policies should state clearly who needs to be notified and what action should be taken, and any relevant timescales. Parents should be asked to provide contact details for at least 2 or more people who can be contacted in the event that a child does not attend school. Schools should refer to Tower Hamlets's [Attendance and Welfare](#) webpage.

Where a parent notifies the school that they are removing the child so they can be educated at home, the following notifications should be made:

- The Academic team must be notified of all decisions.
- If the child is already known to children's social care, their allocated social worker should be notified immediately.
- If the child is not known to Children's social care, but the school has concerns about their welfare, the designated safeguarding lead should make a referral to Children's social care via MASH.

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](#).

## **Elective Home Education (EHE)**

Many home-educated 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.

From September 2016, the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their Local Authority (LA) of all deletions from their admission register when a child is taken off the roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together 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.

DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

## **Opportunities to Teach Safeguarding**

The OMG Governing body should ensure the school provide opportunities for children to learn about Safeguarding. General issues may be addressed through the broad and balanced curriculum already in the school, but key issues relevant to the school community and sensitive issues may be taught through [Relationships Education \(all Primary pupils\)](#), [Relationships and Sex Education \(all secondary pupils\)](#), and Health Education (for all pupils in state-funded schools) which is compulsory from September 2020.

Schools are able to be flexible in how they teach this. DfE documents can be found here:

- The Department of Education has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships, sex and health](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

The following resources may also help schools and colleges understand and teach about safeguarding:

- [DfE advise for schools: teaching online safety in schools.](#)
- [UK Council for Internet Safety \(UKCIS\) guidance: Education for a connected world.](#)
- [UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people.](#)
- [The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors.](#)
- [National Crime Agency's CEOP education programme: Thinkuknow.](#)
- [Keeping children safe in Education 2023 \(KCSIE\)](#)

## **The Child's Wishes**

The best interest of the child should always be at the heart of any decision-making process around safeguarding. The Governing Body, school or college leaders should always make sure the child's wishes and feelings are taken into account when decisions for support are made and actions taken.

## **Other relevant safeguarding guidance**

Schools can access additional guidance, policies and procedures at:

- [DfE Advice for Schools on Equality Act 2010](#)
- [DfE Alternative Provision guidance](#)

- [DfE Working together to improve school attendance](#)
- [DfE School Attendance Parental Responsibility Measures Guidance](#)
- [DfE Behaviour and Discipline in Schools Guidance](#)
- [DfE Preventing and Tackling Bullying guidance](#)
- [DfE Children Missing Education guidance](#)
- [DfE Best Practice Advice for School Complaints Procedures](#)
- [DfE and ACPO Drug Advice for School Guidance](#)
- [DfE Exclusion from maintained schools, academies and PRUs in England](#)
- [DfE Supporting pupils at school with medical conditions](#)
- [DfE Guidance on First Aid for Schools](#)
- [DfE Mental health and behaviour in schools](#)
- [DfE Use of reasonable force guidance](#)
- [DfE Promoting fundamental British values as part of SMSC in Schools](#)
- [DfE The Prevent Duty – Advice for Schools](#)
- [DfE Keeping children safe in education](#)
- [DfE Children who run away or go missing from home or care](#)
- [DfE guidance Preventing youth violence and gang involvement](#)
- [Safeguarding children who may have been trafficked](#)
- [Criminal Exploitation of Children and vulnerable adults: County Lines guidance Preventing and tackling Bullying](#)
- [Promoting children and young people’s emotional health and wellbeing](#)
- [Information sharing advice for safeguarding practitioners](#)
- [Refuge: What is abuse](#)
- [Relationship Abuse: disrespect nobody](#)
- [Homelessness: how local authorities should exercise their functions Private Fostering](#)
- [Upskirting: know your rights](#)
- [Keeping children safe in Education 2023\(KCSIE\)](#)

## **PART 2 Responsibility of Governors, Proprietors and Management**

*Legislation and the Law which Governing Bodies and proprietors adhere to can be found on pages 23-26 KCSIE 2023.*

### **Tower Hamlets Child Protection Services**

Child Protection Services will support OMG to safeguard and promote the welfare of pupils by:

- Co-ordinating the delivery of integrated children’s services within the borough, including an [early help hub](#)
- providing statutory social work services under the [Children Act 1989/2004](#)
- providing OMG with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the [Local Authority Designated Officer \(LADO\)](#)



- Taking responsibility for those children who are not in education, including children who are known to be home-educated.

## **Governing Board**

The term 'governors' and 'governing board' is used throughout to refer to whoever is responsible for fulfilling governance functions. This could be the governors of a maintained school, the trustees of a single or multi-academy trust, or the local governing board to the function in question has been delegated within a multi-academy trust.

The OMG Governing Board will ensure that OMG meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- OMG has the following policies in place, and these are regularly monitored, reviewed and updated where necessary.
  - Safeguarding policies and procedures covering early help and child protection that are consistent with Tower Hamlets Safeguarding procedures
  - A staff code of conduct policy, including policies covering staff/pupil relationships and communications and staff use of social media
  - A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- OMG is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- A member of staff is appointed as the Designated Manager to address allegations against school staff.
- The Chair of the OMG Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the designated safeguarding lead (DSL) with responsibility for carrying out the statutory duties as set out in this policy; the individual is given sufficient time and resources to carry out their responsibilities, and another member of staff is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked-after children and previously looked-after children, and this person has received appropriate training for the role.
- OMG staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- OMG staff are confident that they can raise issues with leaders where there are concerns about safeguarding practices at the school, and there are robust whistleblowing procedures in place.



- Steps are taken to ensure parents and pupils are aware of OMG’s safeguarding and child protection policies and procedures.
- OMG Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including online.
- OMG has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the OMG Governing Board has undertaken accredited safer recruitment training.
- There is a nominated member of the OMG Governing Board who is responsible for Safeguarding and holding school accountable for their statutory duties.
- All OMG staff receive safeguarding and child protection training every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation.
- OMG has procedures in place to deal with allegations made against other pupils.
- Children’s wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children, and there is a robust system in place for gaining feedback from pupils.

### **Schools and Head Teachers/Principals**

The headteacher will ensure that OMG meets its statutory safeguarding duty by ensuring the following:

- OMG staff are inducted thoroughly and have read all OMG safeguarding and child protection policies, and behaviour policies so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All OMG staff are able to identify those children who need extra help and know how to make or request appropriate referrals to early help services.
- All OMG staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and know how to make or request appropriate referrals to children’s social care.
- OMG staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child’s plan, attending network meetings and case conferences, monitoring children’s progress and liaising with social workers.
- A Designated manager is appointed to manage allegations against staff.

- Safer recruitment practice is followed when recruiting to posts, and appropriate action is taken whenever an allegation is made against a member of staff.
- OMG offers a safe environment for staff and pupils to learn.
- Safeguarding issues are brought to the attention of the OMG governing body.

## **PART 3 Safer recruitment**

### **General Principles**

OMG recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working for OMG is suitable to do so and does not pose any kind of risk to children.

OMG will follow the Keeping Children Safe in Education guidance (DfE 2023, part 3).

- OMG will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors and those involved in the management of an independent school, in accordance with statutory requirements. OMG will consider completing online searches of the applicant
- No staff member, volunteer, governor or anyone involved in the management of an independent school, academy or free school will be allowed to take up posts if they have a Section 128 direction. Further information on this can be found in the [Education and Skills Act 2008](#).
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school. Types of DBS checks can be found on Page 63 of KCSIE 2023.
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be clear that safeguarding checks will be completed as part of safer recruitment practices.
- Staff and governors who normally sit on interview panels will have at least one member trained in safer recruitment and no interview should go ahead unless this is the case.
- Although the head teacher will have day-to-day responsibility for the recruitment of staff, the OMG Governing Board will ensure that they maintain an overview of recruitment systems in order to scrutinise practice and ensure all statutory checks are carried out.
- Staff at OMG responsible for carrying out recruitment checks will ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.

- At OMG, the head teacher will be responsible for maintaining a single central record of all staff and volunteers (including governors) who work at OMG.
- The single central record should include details of all checks carried out and the outcome of these checks or any certificates obtained in the format shown in Appendix 3.
- Where staff are recruited via third parties such as employment agencies, the head teacher will:
  - Seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
  - Request a written confirmation of the outcome of all checks
  - Request written confirmation that an enhanced DBS certificate has been received by the agency
  - Check the identity of agency staff when they first present for work to ensure they are the person against whom the checks were taken out.

### Checks to be carried out

Further descriptions of the types of checks can be found in KCSIE 2023. Also available on the DBS website. The DBS maintains 'barred lists' of those unsuitable to work with children and vulnerable adults.

In the recruitment and selection of staff and volunteers, schools/colleges will at all times adhere to the government guidance contained within "[Working Together to Safeguard Children](#)" (July 2018) and "[Keeping Children Safe in Education \(DfE 2023\)](#)."

OMG will verify the following information for all new staff and record it on the single central register/record:

- The applicant's identity must be verified from their passport or other photographic ID, and proof of address must be provided. [Guidance on checking identity can be accessed at GOV.UK](#)
- a standalone children's barred list check
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK (see paragraphs 279-284 KCSIE 2023)
- a check of professional qualifications, where required, and,
- a check to establish the person's right to work in the United Kingdom.

Schools/colleges should be aware of the following central government guidance:

- [Criminal records check for overseas applicants - Publications - GOV.UK](#)
- [Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK](#)
- [Disqualification under the Childcare Act 2006](#)
- [DBS and Filtering](#)

In addition:

- Independent schools (including academies and free schools) must record details of the section 128 checks undertaken for those in management positions (see paragraph 314 KCSIE 2023)

## Retention of Documents

OMG will keep copies of the following documents on staff personnel files:

- Documents used as proof of identity, such as passports or driving licences.
- A copy of the DBS does not have to be kept. If schools/colleges choose to keep a copy, guidance should be sought through GOV.UK in order to adhere to the requirements of the Data Protection Act 2018.
- Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.
- For those who have lived or worked outside of the UK, they **MUST** undergo the same checks as all other staff in schools and colleges. Further guidance on these checks can be found on Page 77 of KCSIE 2023.

If a school or college knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form or regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engage in such work. (KCSIE 2023)

## Agency Staff

Schools and colleges must obtain written notification from the agency that the relevant checks have been completed before they work within the school/college. The written confirmation **MUST** contain state that the certificate has been obtained. Where there is a disclosure of any matter or information on the certificate, the employment business **MUST** obtain a copy of the certificate from the agency. It is recommended that schools should also check the identity of the person presenting themselves is the same person whom the checks have been completed for.

## Volunteers

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

The headteacher will ensure that the following are carried out in relation to unpaid volunteers, such as parents who accompany pupils on school outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews, that is appropriate and proportional to the duties assigned to them.
- Volunteers who are carrying out a regulated activity, for example, being left unsupervised with children or providing personal care to children, will be subject to an enhanced DBS check, including barred list information.
- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check, but this may not include a barred list check.

- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the head teacher/principal will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on the following:
  - the nature of the role
  - what information is already known about the volunteer
  - what references from work or volunteering activity did the volunteer provide regarding the suitability
  - whether the role is eligible for an enhanced DBS check.
- OMG will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualifications and experience.
- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers will be fully inducted in relation to all school policies and procedures.

### **Trainee/Student Teachers**

Applicants for initial teacher training who are employed by the school/college, the school/college must make the necessary checks. If the student is fee-funded, it is the responsibility of the training provider to carry out necessary checks. Written confirmation of checks should be obtained by the school/college.

Schools and colleges have a legal duty to refer anyone to the DBS who has harmed or poses a risk of harm to a child or vulnerable adult. (Full details can be found in KCSIE 2023 P77)

### **References**

- Applicants will be asked to provide full employment history and details of referees, including previous and recent employers, and who should be a senior member of staff with authority to provide references. References should be sought before interviews, and references from colleagues will not be acceptable.
- All references will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided. Open references will not be accepted (e.g. to whom it may concern)
- References will be taken up from current employers only and of a senior level. If the applicant is not currently employed, verification will be sought from their previous school/college as to the dates the applicant was employed and the reasons for leaving the post.
- Any information provided by applicants as part of an application process will be verified with independent sources, and any reference received electronically will be checked to verify the originating source.
- OMG will follow up on all gaps in previous employment

- Always verify any information with the person who provided the reference and ensure electronic copies come from a legitimate source.
- Compare information on the reference to that on the application and follow up on discrepancies with the candidate.
- Establish reasons for the candidate leaving their current or most recent post.

## **DBS checks**

In order to ensure that people who work at OMG are suitable to do so and are not barred from working with children, OMG will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Where a DBS check indicates previous concerns, the Headteacher should conduct a risk assessment as to the suitability of the applicant for the post. This risk assessment should take account of the level of offending when the offences occurred and the circumstances around the offences. The assessment should be recorded and placed upon the personnel record of the applicant.

Full DBS checks, which include barred list checks, will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle
- personal or intimate care.

The activity must be carried out regularly as part of the staff member's day-to-day responsibilities, and the checks will be reasonable in order to safeguard children.

Full DBS checks with barred list checks will also be carried out on permanent staff members working at the school/college or unpaid volunteers who regularly work unsupervised at the school/college and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but not barred list checks.

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by whoever is responsible for recruitment in the school, for example, the head teacher or governor and the following will be taken into consideration when deciding on this:

- The age of the children.
- Their level of vulnerability.
- The number of children in the group.
- The nature of the role. and

- opportunities for contact with the children.

OMG has robust procedures for day-to-day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

OMG will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure or that staff members are subscribed to the [DBS Live Update Service](#). Further information on all areas of the selection and recruitment process can be found in Part 3 of KCSIE 2023.

## **PART 4 Safeguarding Concerns and Allegations Against a Member of Staff**

### **Conduct and safe teaching practice**

- OMG expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- Procedures are in place for the two areas of the allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as 'low-level concerns'.)
- The headteacher will ensure that there is a written code of conduct in place and that each member of OMG staff, including volunteers, signs a code of conduct agreement on appointment that sets out OMG expectations with regard to standards of professional behaviour and that all staff receive copies of relevant policies.
- OMG, Governors will have their own separate code of conduct. This is the responsibility of the governing board or trust.
- OMG staff will be expected to follow the OMG social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with pupils and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the OMG computer system.

In the event that an allegation is made against a member of staff or volunteer, OMG will follow [Tower Hamlets procedures for managing allegations against a member of staff](#).

The OMG Governing Board will appoint the head teacher as the school Designated Manager for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the head teacher. Allegations against the head teacher will be referred to the Chair of the Governing Board.

### **Allegations that meet the harms threshold**

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



- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

The last point includes behaviour that may have happened outside of OMG, making them unsuitable to work with children. Known as Transferable Risk. Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. Such assessments should be completed in conjunction with the local authority designated officer (LADO).

This applies to any child the member of staff/volunteer has contact with within their personal, professional or community life. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the head teacher. If the concerns are about the head teacher, the Chair of the Governing Board should be contacted.

The headteacher will always consult the Local Authority Designated Officer (LADO) immediately after the school is aware of an allegation.

Following consultation, the LADO, in agreement with the headteacher, will decide on appropriate action and consider the following:

- An immediate risk assessment
- immediate referral to the Police
- consideration of disciplinary proceedings
- consideration of a senior strategy meeting

**Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part One of this guidance.

**Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO the nature, content and context of the allegation and agree on a course of action.

It is important to bear in mind that although the concern may relate to an individual pupil, other pupils may also be at risk. The procedures in [DfE Safeguarding Children and Safer Recruitment in Education](#), [Working Together to Safeguard Children](#) and [Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools](#) will be followed in such cases.



When appropriate (see guidance above), consideration will be given to the referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2023 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the [Teaching Regulation Agency](#) can be found on GOV.UK.

### **Concerns that do not meet the harm threshold - Low-Level Concerns**

All concerns regarding the conduct of staff working with children should be referred to the LADO to consider whether the threshold for LADO involvement is met.

Following on from submissions made by the London LADO Regional Group to the [London Safeguarding Partnership](#), the London procedures have been altered to reflect LADO's concerns regarding the adoption of Low-level Concerns by KCSIE.

### **Allegations Against Staff and Volunteers, including supply staff**

Agencies are encouraged to ensure that they have a code of conduct in place which clearly includes references to behaviours/relationships between people in a position of trust and those for whom they are responsible that are over the age of 18; this includes the need for "low level" concerns to be discussed with the LADO and for them to be recorded.

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. These could include suspicion, complaint, or disclosure made by a child, parent, or other adult within or outside of the organisation. Or as a result of vetting checks undertaken.

It is important to have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

### **Low-level concerns**

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) can be raised are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold (see Part Four - Section one KCSIE 2023) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This should enable schools and colleges to identify concerning, problematic or inappropriate behaviour early. Minimise the risk of abuse. And ensure that adults working in or on behalf of the school or college are clear about professional boundaries.

### **What is a low-level concern?**

The term ‘low-level’ concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold set out in paragraph 423 KCSIE 2023. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that isn’t quite right. This may be because they are 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 by the LADO to be serious enough to consider a referral.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section 2 KCSIE 2023), are shared responsibly and with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Low-level concerns should be shared as with any other concerns and recorded for future reference in order to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy](#).

### **Whistleblowing**

OMG fosters a culture of openness in line with the “Freedom to speak up” review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practices within the school that may cause a risk to children.

OMG recognises that there may be circumstances where staff and pupils feel unable to raise concerns or incidents of malpractice within the OMG environment, as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or OMG are failing to safeguard and promote the welfare of children.

Where it is not possible to raise concerns within OMG, staff and volunteers may report concerns to the following:

- Tower Hamlets lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil.
- The following numbers can be used where there are issues regarding OMG’s overall procedures around safeguarding

- Tower Hamlets’s confidential whistle-blowing email address – [Whistleblowing@towerhamlets.gov.uk](mailto:Whistleblowing@towerhamlets.gov.uk)
- the Ofsted whistle-blowing line on 0300 123 3155
- the NSPCC whistleblowing advice line on 0800 028 0285 is open from 8 am – 8 pm Monday –Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

The headteacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

### **Additional policies**

Individual schools should record any additional procedures here or refer to any separate policies, which should cover the following areas:

- Relationships with pupils/positions of power and trust for the purposes of the Sexual Offences Act 2003
- expected guidance on professional and personal standards of conduct and behaviour
- confidentiality
- duty of care
- contact and communications with pupils and parents, including appropriate physical contact, home visits, email and other electronic communications
- behaviour management and use of restraint
- dealing with allegations
- first aid and administering medicines
- providing intimate or personal care
- photography and videos

### **Behaviour management, physical intervention and reasonable force**

OMG will put in place a behaviour management policy, which has been agreed by the Governing Board, which follows government guidance and any use of physical intervention and restraint will be linked to the implementation of this policy. OMG’s culture embraces [Choice Theory](#) to ensure that our pupils have choices, and that they can make the right choices for themselves and their peers.

There are occasions where it may be appropriate for staff at OMG to use reasonable force in order to safeguard pupils. The term ‘reasonable force’ is used to define an action where staff will need to intervene in order to prevent injury or harm to an individual pupil or member of staff. All OMG staff receive training which equips them with de-escalation strategies and safe physical intervention practices to minimise incidents of injury or harm.

Physically handling children with SEND or medical needs requires further consideration, as their additional needs make them more vulnerable. OMG uses Individual behaviour support plans, which have been agreed upon with parents/carers as a way of planning ahead for such eventualities and allow parents/carers to work with staff in constructing a plan that meets the individual needs of the pupil and provides a plan for all staff to be familiar with.

OMG records all incidences of physical intervention and use of reasonable force on the OMG MIS System.

Guidance from the Department of Education provides schools with the power to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at [Behaviour and Discipline in Schools - Publications - GOV.UK](#)

HM Government guidance [Reducing the need for restraint and restrictive intervention](#) provides information on how to support children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention in special education settings. This guidance may also be helpful for schools and colleges.

## Music tuition

It is recognised that music tutors are vulnerable to allegations being made against them because they often work with children alone, and the activity can involve some physical contact with a child.

Music tutors need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:

- Ensure they behave in an appropriate manner and maintain professional boundaries at all times.
- only use physical contact as necessary within the context of the activity, for example, as a means of demonstrating technique, and only for as long as needed
- make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why
- ask the child's permission first and respect their wishes
- report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken
- never travel alone with children in a car
- seek permission from parents before contacting children by mobile phone, for instance, to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable.

At OMG, we carry out a risk assessment around providing music tuition.

This includes:

- Providing rooms/spaces that are adequately safe and open locations where the teacher can be easily observed by others, for example, a door with glass in it and never working alone with pupils
- Passing on any relevant information about children that may have a bearing on how they could react to physical contact so the tutor can adapt their practice accordingly
- Inform parents about Music tuition and what level of physical contact may take place as part of the activity
- Record any reported incidents or issues and deal with these within the framework of the school's own policies
- Make sure music tutors are aware of the school's safeguarding and staff conduct policies prior to starting.

## PART 5 Health and Safety and Risk Assessments

### Responsibility for health and safety

The OMG Governing Board and head teacher will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within the OMG environment.

Any health and safety policy adopted by OMG will be based on the [Health and safety: advice for schools](#) and will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage to risk themselves.

Day-to-day responsibility for health and safety issues at OMG will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training. There should also be a named governor responsible for health and safety. These are:

Name: Jamal Miah

Designation: Director with responsibility for health & safety

Contact details: [jamal.miah@empirecollegelondon.co.uk](mailto:jamal.miah@empirecollegelondon.co.uk); Tel: 0208 159 3838

### **Risk assessments**

OMG will seek to identify and manage risk through the use of risk assessments. These will be carried out:

- On an annual basis for the school environment as a whole.
- For all school trips.
- For pupils travelling between locations during the school day.
- For all work-based learning or work experience placements.
- When a pupil who has been excluded for risky or violent behaviour is returning to the school.
- Whenever there are any changes to the school environment or school practices.
- Following any serious incident, including serious youth violence, harmful sexual behaviour and/or harassment.

Consideration should also be given to conducting risk assessments before PTA and other parent-led events (e.g. fireworks or fairs) where people outside the school may have unregulated access or the usual measures for health and safety may not be sufficient.

### **Working with aggressive and violent parents**

Where OMG is working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that OMG is part of this process.

### **Site security and visitors**

- The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.

- The headteacher will ensure that contractors have received the appropriate level of DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example, NHS staff, the head teacher/principal will request written confirmation that relevant checks have been carried out for that individual.
- All visitors and contractors will be:
  - Informed to report to reception on arrival.
  - Expected to provide proof of identity
  - expected to wear a name badge or carry some form of identification at all times when on the school/college premises.
  - Suitably supervised by OMG staff at all times.
  - Made aware of OMG health and safety procedures.
- The headteacher will ensure that any contract entered into with contractors sets out clearly the expectations for workers' behaviour and the responsibility of contractors to monitor and ensure compliance with school/college policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance on what level of supervision or contact they will have regarding pupils.

### **Use of the school premises by other organisations**

OMG will only allow the use of the school premises by other organisations or schools outside of school hours for the purposes of providing supplemental schooling if:

- The school's incorporating document allows this.
- The organisation provides an overview of what it intends to teach so that the Headteacher, in line with the school letting policy, is able to make a judgement on whether this is in line with the promotion of British values and OMG ethos.
- The organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks.
- Reasonable due diligence checks are taken out on the organisation by the school.

### **Monitoring and review**

To enable OMG to monitor the safety of the premises and the school environment, as well as the implementation of policies, the head teacher and the governing board will ensure that:

- All OMG policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher, and agreed by the governing board.
- OMG keeps a central record of all accidents and incidents, including what action was taken and by whom.
- All OMG staff are aware of their responsibility to record accidents and incidents.
- The headteacher has an overview of all accidents/incidents.
- Serious accidents and incidents are reported to the Governing Board, and appropriate external reporting ([RIDDOR](#)) is conducted.
- The designated safeguarding lead ensures a high standard of recording all concerns held about children.
- All accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around OMG safeguarding policies and procedures or any emerging patterns and agree to any course of action.

## Appendix 1: Role of the designated safeguarding lead (DSL)

The role of the designated safeguarding lead (DSL) and their deputy is to take lead responsibility for safeguarding and child protection (including online safety) within the school/college and to be available during school hours for staff to discuss safeguarding concerns. This role should be explicit within their job description. They MUST be a senior member of staff from within the leadership team.

The designated safeguarding lead (and their deputy) will:

- Liaise with and manage referrals to relevant agencies such as Children’s Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).
- Keep the head teacher informed of ongoing safeguarding and child protection issues and enquiries, especially [section 47 enquiries](#).
- Provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- Ensure the school’s safeguarding and child protection policies are up to date and consistent with Tower Hamlets Safeguarding Children policies and that policies are reviewed annually.
- Ensure all OMG staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1, the school’s Code of Conduct, the School Safeguarding Policy, including the Annex to this policy for their school and the Behaviour Policy. They will be a point of contact for advice and support for staff as well as safeguarding partners.
- Attend regular training, including Prevent awareness training, in order to keep up to date with new policies, emerging issues and local early help, safeguarding and child protection procedures and working practices.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues.
- Provide regular updates to all staff members and governors on any changes in safeguarding or child protection legislation.
- Liaise with the mental health lead, where safeguarding concerns link to mental health.
- Have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs.
- Liaise with the designated teacher for CLA whenever there are safeguarding concerns relating to a looked-after child or previously looked-after child.



- Oversee child protection systems within the school/college, including the management of records, standards of recording concerns and referral processes.
- Provide a link between OMG and other agencies, particularly children’s social care and the Tower Hamlets Safeguarding Children Board.
- Ensure all OMG staff, including temporary staff, receive appropriate safeguarding and child protection training at least every 2 years.
- Ensure parents are fully aware of OMG policies and procedures and that they are kept informed and involved.
- All records are kept up to date and stored securely. It is good practice to keep a separate child protection file.
- Ensure relevant records are passed on appropriately when children transfer to other schools and, where appropriate, share relevant information with schools or colleges to enable continued support of the child on transfer. Schools will gain a receipt when passing files to a new provision. This should be within 5 days of the transfer.

*FULL Details of the role of the designated safeguarding lead and deputy can be found in Annexe C of KCSIE 2023. It is important that the DSL and DDSL are fully aware of their role and have the capacity to carry out all areas of this.*

## **Appendix 2: Example Safeguarding Report Form**

**Name of child**

**First Name**

**Family Name**

**Also known as**

**First Name**

**Family Name**

**Date of Birth**

**Date, time and place of incident causing you concern**

**Record of what the child said or did, what you observed and said to the child**

**Record discussion with parent/carers**

**Record discussion with another professional**

**Name of professional**

Action taken / strategies

**\* Please confirm you have spoken to the parent about your recording (unless doing so places the child at further risk).**

Yes      No

**Next Steps**

- Continue monitoring
- Carry out Early Help Assessment
- Referral to MASH
- Referral to health services
- Referral for education support services
- Referral on behalf of parent/carer

**To be filled by Senior Designated Officer for safeguarding**

<b>Date of Writing</b>		<b>Time of writing</b>	
<b>Print Name:</b>			
<b>Signature</b>			
<b>Setting</b>			

## Appendix 3: Child Protection Definitions and Indicators

### Definitions

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse, as well as witnessing the ill-treatment of others. Under the [Children Act 1989](#), OMG has a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering significant harm, which is defined as:

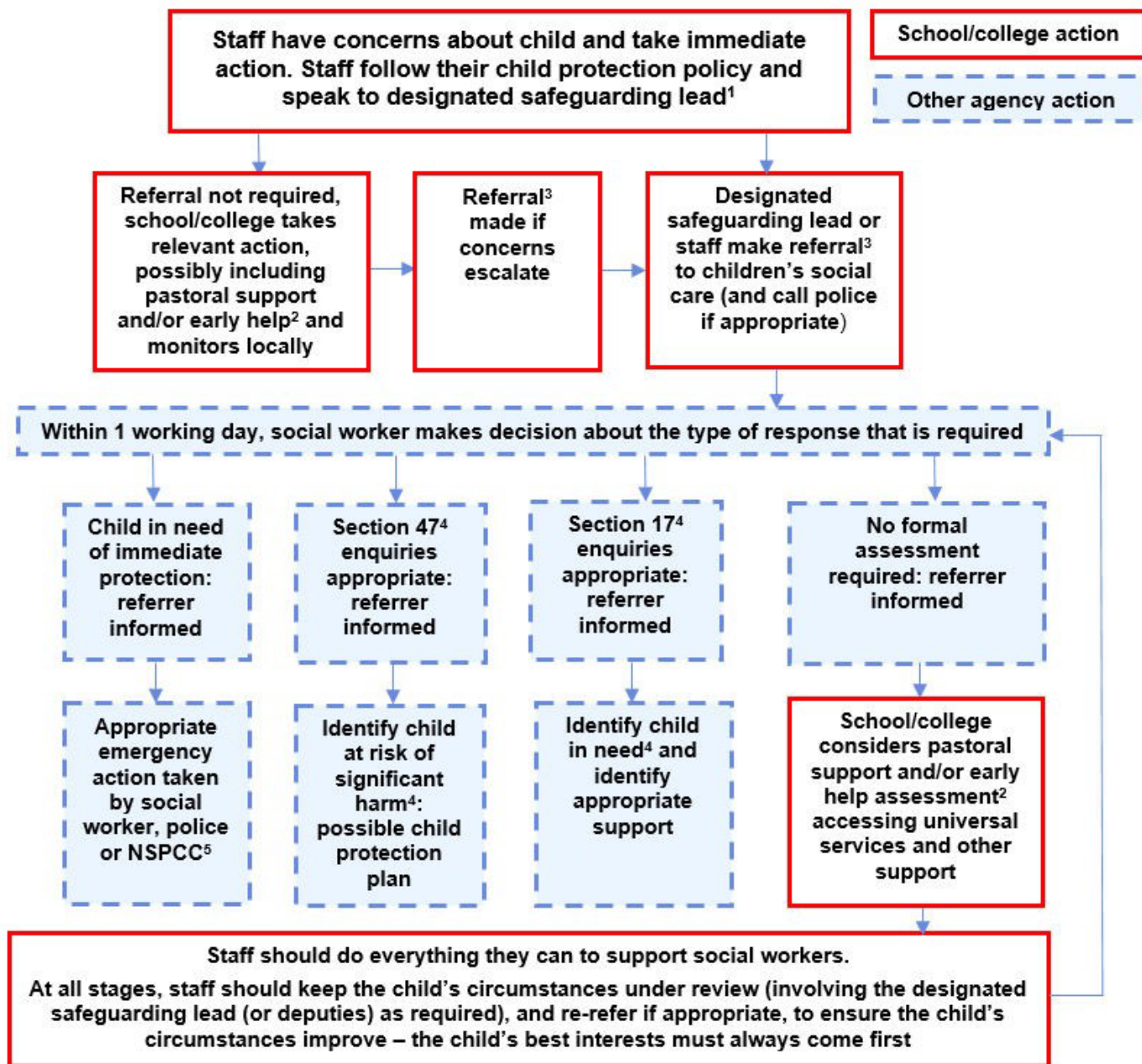
- **Neglect:** failure to provide basic care to meet the child’s physical needs, such as not providing adequate food, clothing or shelter. Failure to protect the child from harm or ensure access to medical care and treatment.
- **Physical abuse:** causing physical harm or injury to a child.
- **Sexual abuse:** involving children in sexual activity or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.
- **Emotional abuse:** failure to provide love and warmth that affects the child’s emotional development. Psychological ill-treatment of a child through bullying, intimidation or threats.

### Possible indicators of abuse and neglect:

<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Inadequate or inappropriate clothing</li> <li>• Appears underweight and unwell and seems constantly hungry</li> <li>• Failure to thrive physically and appearing tired and listless</li> <li>• Dirty or unhygienic appearance</li> <li>• Frequent unexplained absences from school</li> <li>• Lack of parental supervision</li> </ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"> <li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>• High frequency of injuries</li> <li>• Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"> <li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child’s age/stage of development</li> <li>• Sexual risk-taking behaviour, including involvement in sexual exploitation/older boyfriend</li> <li>• Continual, inappropriate or excessive masturbation</li> <li>• Physical symptoms such as injuries to the genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>• Unwillingness to undress for sports</li> </ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"> <li>• Developmental delay</li> <li>• Attachment difficulties with parents and others</li> <li>• Withdrawal and low self-esteem</li> </ul>

<p><b>Indirect indicators of abuse and neglect</b></p>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Withdrawal and low self-esteem</li> <li>• Eating disorders</li> <li>• Aggressive behaviour towards others</li> <li>• Sudden unexplained absences from school</li> <li>• Drug/alcohol misuse</li> <li>• Running away/going missing</li> </ul>
<p><b>Parental attributes</b></p>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> <li>• Domestic violence</li> <li>• Avoiding contact with school and other professionals</li> </ul>

## Appendix 4: Actions where there are concerns about a child (P22 KCSIE Sept 2023)



## Appendix 5: School Single Central Record/Register (SCR)

Please note:

- Checks carried out on volunteers, maintained school governors and local governors in an academy trust do not need to be recorded on the SCR under the latest version of Keeping Children Safe in Education (KCSIE), but it is recommended to include them
- KCSIE does not say specifically that contractors must be on the SCR, but it does say all staff who work at the school must be included, including supply staff, so it's best to include contractors too
- Where academies are mentioned, this includes free schools.

### Important notes

This record should indicate what checks have been taken out for the following:

- For schools, all staff, including supply staff and teacher trainees on salaried routes, who work in school and others who work in regular contact children in school, including volunteers and governors
- For independent schools, including academies and free schools as above plus all members of the proprietorial body and involved in the management of the school
- For colleges, all staff providing education and/or whose positions involve a relevant activity

### Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

### Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised, an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.
- For existing volunteers who provide personal care, the school should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity, there is no requirement for an enhanced DBS check (a school can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity, a risk assessment should be made, and a professional judgement should be made about the need for an enhanced DBS check.
- Supervision of volunteers – there must be supervision by a person in regulated activity; where supervision occurs, this must be regular and day-to-day, and the supervision must be reasonable in all circumstances to ensure the protection of children.

### Regulated activity

Regulated activity (see p171 KCSIE 2023 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature

defined is considered regulated activity if done regularly. Where this is the case, an enhanced DBS check is needed with a barred list check.

## Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS check if a check is required, e.g. if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

## Documents and certificates

OMG collects the following documents during the recruitment process. All documents provided by the prospective staff are kept secure.

<b>Proof of current address</b>
<b>Proof of identification</b>
<b>Professional qualifications essential to role</b>
<b>Original enhanced DBS applied for/requested</b>
<b>The most recent enhanced DBS received and seen.</b>
<b>Children's barred list check seen</b>
<b>Overseas checks</b> – if applicable, eg: <ul style="list-style-type: none"> <li>• Certificate(s) of good conduct</li> <li>Letter(s) of professional standing</li> </ul>
<b>Prohibition from teaching check</b>
<b>Section 128 check (prohibition from management)</b>
<b>Disqualification declaration</b> (annual form) – if applicable
<b>Online search</b> – shortlisted candidates from 1/9/22
<b>Right to work in the UK.</b>
<b>Reference 1 received</b> - one reference must be a most recent or current employer.
<b>Reference 1 follow-up</b> – the referee was phoned, and the reference validated.
<b>Reference 2 received</b>
<b>Reference 2 follow-up</b>
<b>Advert:</b> safeguarding statement, role and salary, exemption of Rehab of Offenders Act 1974
<b>Job description and selection criteria</b>
<b>Application form</b>



<b>Shortlisting record</b> – including self-declaration form being sent for those shortlisted, letter of invite to interview, was candidate informed that they would be subject to an online search as part of due diligence checks?
<b>Interview schedule</b> – incl. questions and activities – records of the interview, including who was on the panel.
<b>Offer letter</b>
<b>Risk assessment</b> - if required
<b>Health declaration</b>