Twin Oaks Primary School
SAFEGUARDING POLICY
September 2026

The school where everyone is valued and all succeed.

Governing Body with Responsibility	Full Governing Body
Agreed by Governors on	5/10/26
Chair's Signature	Samantha Hoyer
Staff Member Responsible for Review	Headteacher
Date for Review	October 2027

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This policy should be read alongside the following other policies:

- Personal and intimate care
- Complaints procedure
- Anti-bullying policy
- Whistle blowing policy
- SEND policy
- Behaviour policy

- Safer Recruitment policy
- Grievance and disciplinary
- Attendance Policy
- Relationships, Sex and Health Education Policy
- Lewisham's Early Help Strategy (http://www.safeguardinglewisham.org.uk/assets/1/finalearlyhelpstrategy.pdf)

Safeguarding and Child Protection Structure at Twin Oaks Primary School

Headteacher	**Karen Cartwright**
Designated Safeguarding Lead	**Lisa Shearsby**
Deputy Safeguarding Lead(s)	**Karen Cartwright** **Amy Langridge**
Designated Governor for Child Protection	**Morgan Bradshaw**
Review Cycle	Annual
Governing Body Ratification	
Date shared with staff	September 2026
Review Date	September 2027
Legal Framework	Children Act 1989 (as amended 2004 Section 52) Children Act 2004 Children Schools and Families Act 2010 Education Act 2002 s175/s157 The Teachers Standards' 2012 The Counter Terrorism and Security Act 2015 (section 26 The Prevent Duty) Equality Act 2010 Crime and Policing Act 2026 (regulated activity/DBS provisions) Data (Use and Access) Act 2025
Statutory Guidance	Keeping Children Safe in Education (September 2026) Working Together to Safeguard Children (December 2026) Children who run away or go missing from home/care (Jan 2014) Children who run away or go missing from home or care (January 2014) Prevent Duty Guidance: England and Wales (2023) SEND Code of Practice: 0–25 years (2015)
Department of Education and Local Advice and Guidance	What to do if you're worried a child is being abused (March 2015)

	Information Sharing – Advice for practitioners Providing safeguarding services to children, young people, parents and carers (May 2024)

At Twin Oaks Primary School, we have a primary responsibility for the care, welfare and safety of all pupils in our charge. We are committed to providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, whether that is within or outside the home, including online, preventing impairment of children's mental and physical health or development and ensuring that children grow up in circumstances consistent with the provision of safe and effective care (Working Together to Safeguard Children (2026).

Twin Oaks staff are advised to maintain an attitude of 'it could happen here' as far as safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interest of the child.

We encourage a culture in which all staff believe safeguarding to be of the highest importance and understand that their vigilance is critical. We want all staff to feel confident to discuss their concerns with designated staff/Governors and have clear lines of protocol in place for how to do this.

At Twin Oaks Primary School, we explicitly teach pupils about safeguarding themselves in and outside of school, including online, through a broad and balanced curriculum. We establish and maintain a culture in which children feel secure, are encouraged to talk and are listened to.

At Twin Oaks Primary School, we recognise that 'Adultification bias' is a form of racial prejudice where children of minority groups, typically Black children, are treated by adults as being more mature than they actually are. Actions committed by these children that would be deemed normal for child development are more likely to be treated as opportunities for discipline and children are more likely to be seen as having malicious intentions. A clear example of this bias in action is when a Black child is assumed to be older than their actual age. These perceptions could in turn perpetuate the maturity of Black children and the assumptions of adults can lead to these students experiencing harm and can lead to Black children are not receiving the safeguarding responses they need.

This can inadvertently send a clear message in terms of worth and value to children as to who is and is not perceived as worthy of support. This can then impact on how Black children view themselves and what they then identify and understand to be harmful. Ultimately, this type of behaviour normalises harm and feeds into the narrative that Black people can withstand any form of abuse.'

Twin Oaks Primary School has signed the Lewisham's pledge to tackle race inequalities in school. We pledge to take actions that will address access and opportunity for all pupils, by highlighting inequalities and increasing awareness.

We commit to:

- Targeting ambitious outcomes for Black Caribbean heritage and Black and Minority Ethnic pupils
- Reducing exclusions of Black Caribbean heritage pupils of all ages

- Leaders and governors taking a whole school approach to tackling race inequality
- Transparent reporting and sharing of borough-wide data trends
- Working together in new ways and sharing good practice to tackle race inequality in our school cultures and curriculum
- Actively developing high quality relationships with Black Caribbean heritage and Black and Minority Ethnic pupils and their parents
- Improving Black representation in school leadership and governing bodies.

This Safeguarding Policy applies to **all** staff, governors and volunteers working in school.

1.0 Rationale:

This policy has been developed in accordance with the principles established by the Children Act, 1989, the Education Act, 2002 and the statutory guidance: Keeping Children Safe in Education, (KSCIE) 2026.

At Twin Oaks Primary School, we believe that the needs of the child are paramount. All children deserve the opportunity to achieve their full potential; they have the right to be protected from harm and exploitation whatever their race, religion, first language or ethnicity, gender or sexuality, age, health or disability, political or immigration status.

All staff accept their fundamental responsibility to keep pupil's safe, promoting children's social, physical, emotional and moral development. All staff are trained to identify signs of abuse and exploitation, and work to identify, assess, and support those children who are suffering harm. Staff will help to equip children with the skills needed to keep them safe.

There are three main elements to the child protection and safeguarding policy:

PREVENTION through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos.

PROTECTION by following agreed procedures for identifying, monitoring and reporting cases, or suspected cases, of abuse; protecting children from unsuitable people.

SUPPORT to victims and culprit of abuse and to staff in identifying signs and symptoms of abuse.

Aims:

- To provide a caring environment in which children and young people feel safe, secure, valued and respected.
- To instil confidence so that pupils can trust adults and know how to approach staff if they are in difficulty.

- To raise awareness among all staff, both teaching and non-teaching, of the need to safeguard children through identification and prompt reporting of all possible cases of abuse.
- To ensure that rigorous systems of identification, reporting and monitoring are in place to protect all children from harm.
- To establish clear and effective channels of communication between staff, and to develop effective working relationships with all other agencies involved in safeguarding children including Children Social Care services, the police and health services.
- To ensure that all adults have appropriate checks and relevant safeguarding training completed before working with children.

2.0 Roles and Responsibilities:

All adults working with children have a responsibility to protect children.
At Twin Oaks Primary School, there are, however key people within school who have specific responsibilities.

Designated Safeguarding Leads	**Deputy Designated Safeguarding Leads**	**Designated Governor for Safeguarding**
To attend safeguarding Level 3 refresher training every two years. (Minimum requirement). Deliver annual staff safeguarding training according to the needs of the team and/or in response to current practices. Ensure all staff have read and understood part 1 of KCSIE. Liaise with class teachers, learning mentors and other relevant staff to provide support for the child in school. Liaise with agencies that support the child such as social care, Child and Adolescent Mental Health Services (CAMHS), Education Welfare Service and Educational Psychology service.	To attend safeguarding Level 3 refresher training every two years. During initial meeting with new pupils – make parents aware of safeguarding policy. Monitor children on CP register and all 'live' concerns. Receive current information for children on CP register weekly. Lead/ attend TAF meetings as necessary. To maintain good relations with the school community to ensure	Ensure all members of the governing body have attended Safeguarding and Child protection (including online safety) training as part of their induction. Ensure all staff attend yearly safeguarding training and have read all of part 1 of KCSIE. Report to the governing body the number of cases (without names or details) of child protection issues in the school. Ensure safeguarding policy is reviewed annually. To oversee procedures relating to allegations

Support or lead ‘team around the family’ (TAF) meetings and attend case conference reviews/ core group meetings. Ensure the child protection policy is reviewed, updated and enforced every year. To meet weekly/biweekly with the Deputy/Assistant Heads to discuss ongoing safeguarding and behaviour concerns. To meet half-termly with designated safeguarding link governor. Ensure that relevant paperwork is copied and filed before being transferred to a pupil’s new school within 5 days. Promote educational outcomes by sharing about welfare, safeguarding and child protection issues information regarding vulnerable children with teachers and leadership staff. The DSL will be responsible when a school places a pupil with an alternative provision (AP) provider. As the school retains accountability for the pupil’s safeguarding. The Designated Safeguarding Lead will meet with the alternative provision provider at least half termly to ensure that the provider meets the pupil's needs. A review of filtering and monitoring effectiveness must be carried out at least annually by the SLT lead responsible for	effective support and access to support.	made against the Head Teacher.

filtering and monitoring, supported by the DSL and IT team. The review should confirm that filtering is working effectively across all internet-connected devices and relevant locations, with records of checks maintained.		

The Headteacher will:

- Ensure that all policies and procedures adopted by the Governing Body are fully implemented, and followed by the staff.
- Work towards establishing and maintaining a culture in school where all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children. These concerns will be treated sensitively and proactively in line with the school's Whistle-blowing policy.
- Ensure that all relevant training for all staff and governors is up-to-date and reviewed annually.
- Ensure that all staff have read Part one of 'Keeping Children Safe in Education in and have signed to acknowledge they have read and understood its contents.
- Ensure robust cover arrangements are in place for when the DSL (or a deputy) is not available, for example during term time absence, so that staff and Children's Social Care always know who to contact, including via a confidential shared mailbox.
- The SENDCO is the primary Designated Lead for safeguarding with the Headteacher as secondary Designated Lead for safeguarding. In their absence, the Deputy Head.
- Heads will take on the following responsibilities. A designated Governor (Chair of Governors) is also identified.

The Designated Safeguarding Lead (DSL) will:

- Have received the appropriate official training, which will be undertaken every two years, and obtain access to resources and attend any relevant or refresher training courses including PREVENT.
- Ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures, including new and part time staff. The DSL should ensure the school's policies are known and used appropriately.
- Ensure the Safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect and exploitation may be made and the role and responsibility the school has in this.
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help Assessments.
- Be able to keep detailed, accurate and secure written records of all concerns and referrals.

- Have a working knowledge of how local authorities conduct a Child Protection Case Conference and a Child Protection Review Conference and be able to attend and contribute to these effectively when required to do so.
- Be alert to the specific needs of children in need, those with special educational needs/disability and young carers.
- Encourage a culture of listening to children among all staff.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding whether to make a referral, liaise with the appropriate agencies.
- Refer all cases of suspected or alleged abuse or harm by a member of the school staff**,** colleague or volunteer known to work with children to the local authority children's social care and the LA Designated Officer (LADO)
- Ensure the school's safeguarding policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, working with the governing body regarding this.
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.
- Ensure that safeguarding issues are regularly discussed at Governors, SLT and staff meetings.
- Ensure all members of the governing body have attended Safeguarding and Child protection (including online safety) training as part of their induction.
- Promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.

The Governing Body at Twin Oaks Primary School will ensure that:

- The school has a Safeguarding policy in place and that procedures are in accordance with statutory and Local Authority (LA) guidance.
- The Safeguarding policy is made available to parents.
- Safer recruitment procedures are used at all times, and all appropriate checks are carried out on staff and volunteers who work with children.
- The Designated Safeguarding Lead (DSL) with responsibility for safeguarding is a member of the senior leadership team.
- All staff and governors have undertaken the appropriate safeguarding training.
- A nominated governor will have responsibility for liaising with the DSL, the LA and partner agencies.
- Oversee procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the LA and locally agreed inter-agency procedures.
- Policies and procedures are reviewed annually.
- All members of the Governing Body will have an Enhanced DBS check and a risk assessment to determine if a barred list check is required. NB: It is illegal to conduct a barred list check for any person not in regulated activity.

- The Chair of Governors oversees appropriately anonymised LADO referral information as well as managing investigations into allegations made against the Headteacher

3.0 CHILD PROTECTION:

At Twin Oaks Primary School, we fully recognise our responsibilities for child protection and strive to achieve an environment where children feel secure, supported and valued within and beyond the school gate.

We recognise that some children may be victims of neglect, exploitation, and/or physical, sexual, or emotional abuse. Such harm can occur within the home, outside the home, or online. Staff at school, through their daily contact with and knowledge of the children in their care, are well placed to identify signs of abuse or exploitation, provide support, and take appropriate action to safeguard children in need.

All child protection concerns and referrals will be handled sensitively, professionally, and with appropriate confidentiality, ensuring information is shared only with those who need it to safeguard the child. Confidentiality will never be a barrier to reporting or referring concerns, as safeguarding responsibilities take precedence over data protection requirements, including GDPR. All actions will prioritise the safety and wellbeing of the child.

What is Child Protection?

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Safeguarding, in addition to child protection, encompasses issues such as pupil health and safety, bullying/cyber-bullying, appropriate medical provision. These areas have specific policies and guidance which should be read in conjunction with this document.

What is significant harm?

The Children's Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

Responsibilities

The responsibility for child safeguarding falls on everybody who is employed at Twin Oaks Primary School . All adults who work at Twin Oaks Primary School are expected to support the Child Protection and Safeguarding Policy, with overall responsibility falling on the Headteacher. All staff, including volunteers have a statutory obligation to report to the DSL if there is suspicion of abuse, neglect and exploitation of a child or if a child discloses abuse or allegations of abuse.

3.1 Recognising abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

Abuse, neglect, and exploitation are all forms of maltreatment that can severely impact a child's well-being. Abuse involves actively causing harm, such as hitting a child, while neglect refers to failing to protect a child from harm, such as leaving a small child home alone or placing dangerous objects like knives or matches within reach of an unattended toddler. Exploitation, another serious form of maltreatment, involves taking advantage of a child for personal gain, which can include forcing them into labour, engaging them in illegal activities, or subjecting them to sexual abuse. Each of these forms of maltreatment can have devastating effects on a child's physical, emotional, and psychological health.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person.

Emotional abuse may include verbal abuse, such as persistent criticism, belittling, humiliation, rejection, intimidation or name-calling. It may also involve age- or developmentally inappropriate expectations being imposed on children, including interactions that are beyond a child's developmental capability, overprotection, limiting opportunities to explore and learn, or preventing participation in normal social interaction.

Emotional abuse may include seeing or hearing the ill-treatment of another person, including domestic abuse. It may also involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of a child.

Some level of emotional abuse is present in all types of child maltreatment, although it may also occur in isolation.

Sexual abuse

Sexual abuse involves forcing or enticing a child person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

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

(Definitions taken from Working Together to Safeguard Children)

Exploitation

Child exploitation encompasses various forms of abuse and maltreatment, including sexual exploitation, forced labour, trafficking, and the use of children in illicit activities such as drug trafficking (County Lines). It also involves the manipulation or coercion of children into performing activities that are harmful to their physical, mental, or emotional development.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. Bullying can have a significant and lasting impact on a child's emotional wellbeing and mental health. While suicide is rarely caused by a single factor, evidence shows that bullying, including online bullying, can be a contributing factor in some child deaths by suicide. Staff should remain alert to signs of bullying, distress, self-harm, or suicidal thoughts and respond promptly in line with safeguarding procedures.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. In the event that there is a possibility the bullying may be linked to abuse/, the Headteacher and the DSL will consider implementing child protection procedures.

3.2 Indicators of abuse and what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

It is the responsibility of all staff members, volunteers and contractors to *report* their concerns. It is *not their responsibility to investigate* or decide whether a child has been harmed or abused.

A child who is being harmed, abused, neglected and exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.
- Unexplained fear, anxiety, depression, or aggression.
- Unexplained increase in social media activity, especially at odd hours
- Presence of an older boyfriend/girlfriend or adult friend.
- Evidence of expensive gifts, money, or possessions without clear explanation.
- Regularly missing school or unexplained changes in school performance.
- Extreme secrecy or privacy, especially regarding online activities
- Low self-esteem or self-worth.
- Self-harm or suicidal tendencies

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that all staff, volunteers and/or contractors report *all* concerns even if there is no 'absolute proof' that the child is at risk. (All incidents must be reported on MyConcern which all staff have a log in for. Support for logging an incident can be gained from any member of the SLT)

3.3 Taking action

For staff to be able to identify and respond appropriately to possible abuse and/or neglect, they must at all times follow the four stages below:

1.Be alert
2.Question behaviours
3.Ask for help
4.Refer

It may not always be appropriate to go through all four stages sequentially, if a child is in immediate danger or is at risk of harm, the DSL must refer to police or social care without delay, so it is important staff share any concerns in a timely manner to ensure children are safe.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When worried about the welfare of a child, staff members should always act in the interests of the child and report any concerns as per Twin Oaks Primary School procedures as set out below.

Staff concerns about a child / young person's wellbeing, is likely to be based on:

a) Something the child/young person/parent has told them
b) Something they have noticed about the child's behaviour, health, or appearance
c) Something another professional said or did

Even if staff believe their concern is minor, it is always their responsibility to share concerns no matter how small. The DSL may have more information that, together with what staff have shared, represents a more serious worry about a child. It is never up to a staff member to make their decision alone on how to respond to concerns.

3.4 If you suspect a child is at risk of harm

There will be occasions when staff suspect that a child may be at serious risk, but they have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or other physical but inconclusive signs may have been noticed. In these circumstances, staff will always try to give the child the opportunity to talk. The signs noticed may be due to a variety of factors and it is wholly appropriate to ask the child if they are alright or if they can help in any way.

Use MyConcern to record these early concerns. If the child does begin to reveal that they are being harmed staff should follow the advice in the section 'If a child discloses to you'.

If, following the conversation, they remain concerned, they should discuss your concerns with the DSL.

3.5 If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to any member of staff about any risks to their safety or wellbeing it is very important that staff let them know that **they must** pass the information on. Under no circumstances should staff keep any secrets for children. Staff/volunteers/contractors should:

1. Decide whether they need to find out more by asking the child / young person, or their parent to clarify any concerns, being careful to use open questions: beginning with words like: ‘how’, ‘why’, ‘where’, ‘when’, ‘who’?
2. Let the child/young person/parent know what they plan to do next
3. Not promise to keep what s/he tells them secret....for example, ‘I am worried about your bruise and I need to tell Miss Shearsby so that she can help us think about how to keep you safe’
4. Inform the DSL immediately. If the DSL is not available, inform the Deputy DSLs. If there is no other member of staff available, staff must make the referral themselves
5. Make a written record on MyConcern as soon as possible after the event, noting:

   a. Name of child
   b. Date, time and place
   c. Who else was present?
   d. What was said / What happened / What was noticed ... speech, behaviour, mood, drawings, games or appearance
   e. If child or parent spoke, record their words rather than the staff member’s interpretation
   f. Analysis of what you observed and why it is a cause for concern

During a conversation with the child staff should:

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother thinks about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ as a child may interpret it that they have done something wrong.
- Tell the child what will happen next, either going straight to the designated person or advising that someone will come to see them before the end of the day.
- Report verbally to the designated person.
- Write up your conversation as soon as possible on MyConcern.
- Seek support if they feel distressed.

3.6 Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care.

3.7 Referral to Children's Social Care

The DSL will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. (See 3.10 for details on how this referral can be made).

3.8 Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL/Headteacher, Deputy DSL or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection and safeguarding information will be collected, stored, shared and retained in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026).

The school recognises that effective safeguarding relies upon the lawful and proportionate sharing of information. Personal information will only be shared where it is necessary, proportionate and lawful to do so in order to safeguard and promote the welfare of children.

Child protection records will be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate safeguarding purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- retained only for as long as is necessary in accordance with statutory requirements and the school's retention schedule;

- processed in accordance with individuals' data protection rights, except where safeguarding legislation or the public interest requires information to be shared; and

- stored securely, with access restricted to those who have a legitimate safeguarding need to know.

In line with KCSIE 2026, the school recognises that cyber security is part of its safeguarding responsibilities. Governors and school leaders will take reasonable measures to protect personal information, in line with the Cyber Security Standards for Schools and Colleges, so that a cyber-incident, data breach or system failure does not compromise the safety of pupils or the school's ability to monitor and respond to safeguarding concerns.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of GDPR, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the head teacher.

GDPR principles do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. When information is shared, the reason for doing so as well as the reasons why consent may not have been sought, will be clearly documented within the child protection records.

Information will be shared in accordance with the principles set out in **Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (May 2024).**

When a child leaves the school (including in year transfers), their Child Protection files will be copied with the copies archived and stored securely for 7 years and the original securely packaged and transferred by hand or secure delivery to the new school. The designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.

The school's policy on confidentiality and information-sharing is available to parents and children on request.

3.9 Early Help and Family Thrive

Twin Oaks Primary School is committed to identifying children and families who may benefit from early support and providing help as soon as concerns emerge. Early intervention can prevent needs from escalating and improve outcomes for children and young people.

The school follows Lewisham's Multi-Agency Threshold Guidance, which is based on the London Continuum of Need and the statutory guidance Working Together to Safeguard Children (2026). The guidance assists practitioners in assessing a child's level of need and ensuring children and families receive the right support at the right time.

The four levels of need are:

- **Level 1 – Universal Needs:** Children whose needs are met through universal services.
- **Level 2 – Additional Needs:** Children and families who would benefit from early help to prevent needs from escalating.
- **Level 3 – Complex Needs:** Children and families requiring coordinated multi-agency support through targeted early help (Family Help) or other specialist services.
- **Level 4 – Acute Need:** Children who are suffering, or are likely to suffer, significant harm and require statutory intervention from Children's Social Care.

Community-Based Early Help

Community-based early help is available to all children, young people and families who require additional support before problems escalate. This support is provided through universal and community services and may include:

- schools and educational settings;
- health visitors, school nurses and primary healthcare;
- children's centres and family hubs;
- youth services;
- parenting programmes;
- community and voluntary sector organisations; and
- other local support services.

Where a child's needs can be met through community-based services, the school will work collaboratively with families and partner agencies to ensure appropriate support is accessed at the earliest opportunity.

Targeted Early Help (Family Help)

Where a child or family's needs are more complex, persistent or require coordinated support from several agencies, a referral may be made for Targeted Early Help (Family Help).

In Lewisham, Family Help provides consent-based, targeted support for children, young people and families whose needs cannot be met through community-based early help alone but who do not meet the threshold for statutory Children's Social Care intervention.

Family Help practitioners work with children, families and partner agencies to:

- undertake a Family Help (Early Help) Assessment;

- identify strengths, needs and desired outcomes with the family;
- coordinate a multi-agency plan of support;
- act as the Lead Practitioner where appropriate;
- convene and chair Team Around the Family (TAF) meetings;
- provide direct work with children, young people and parents/carers;
- support families to build resilience and sustain positive change; and
- regularly review progress to ensure support remains proportionate to the child's needs.

The school will actively participate in Family Help assessments, Team Around the Family meetings and review meetings, sharing relevant information to promote the safety and wellbeing of children.

Working with Parents and Carers

Where appropriate, the school will discuss concerns with parents or carers before making a referral for community-based early help or Targeted Early Help (Family Help), seeking their consent and encouraging their participation in the assessment and planning process.
However, safeguarding the welfare of the child is paramount. Where there are concerns that a child may be at risk of harm, or where seeking consent would place the child at increased risk or compromise a safeguarding enquiry, the school will share information and make referrals without consent in accordance with statutory safeguarding guidance and local multi-agency procedures.

Reviewing Early Help

Where an Early Help or Family Help assessment is in place, the school will contribute to multi-agency planning and review meetings. The support plan will be reviewed regularly to consider progress, identify any changes in need and determine whether support should:

- continue;
- be increased through Targeted Early Help (Family Help) or statutory services; or
- be stepped down to community-based early help or universal services once outcomes have been achieved.

If, at any stage, there is evidence that a child is suffering or is likely to suffer significant harm, the Designated Safeguarding Lead (DSL) will make an immediate referral to Lewisham Children's Social Care in accordance with local safeguarding procedures.

3.10 Team around the School (TAS)

TAS is a local network consisting of schools and other family support services that meet on a regular basis (each term) to have a shared conversation about children and young people that we may be worried about and that early help and intervention may stop concerns escalating. Individuals from a range of different agencies working together to pool resources come together, to provide support to families that is outcome driven, focused on solutions and helps the family to become more resilient to prevent a child or young person requiring complex/acute support in the future.

Schools facilitate the TAS, identifying the children and young people and complete the TAS Referral form to facilitate discussion .Parents do not attend these meetings,

however, need to consent to their information being shared. The TAS will ensure their views and wishes are expressed and considered in any discussion. During the TAS meeting, the school and partner agencies will explore how best to support the child, young person and family to achieve clear outcomes, sustainable change, and prevent them requiring complex and acute support in the future.

The focus is early intervention for children, young people and their families who have an unmet need but who don't require specialist services; ensuring that early help support is getting to families as early as possible.

3.11 Lewisham Family First Contact Point (FFCP)

Referrals to Children's Social Care are only made for children with needs at Level 3 or 4 of the Continuum of Need. This is determined where children are identified as requiring specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their mental and/or physical health and development and/or who are disabled. They may require longer term intervention from specialist services. In some cases, these children's needs may be secondary to the adults needs. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989 although the assessments and services required may come from a range of provision outside of children's social care.

Staff with concerns should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSL/Deputy DSL/ Headteacher or the Chair of Governors (for allegations against the Headteacher) are all unavailable
- they are convinced that a direct report is the only way to ensure the child's safety.

As advised in KCSIE 2026 the DSL (including any deputies) should liaise with the three safeguarding partners in line with Working Together to Safeguard Children and NSPCC – When to call the Police

Making a FFCP request

If, as a professional, staff have safeguarding concerns or are requesting additional targeted early help, they can use the online FFCP request form after reading the below information.

Please note that residents and other members of the public can still make referrals in person or over the phone.

All requests that come through the MASH will be triaged by the multi-agency team and staff may be contacted by a professional representing the school to discuss the request.

Before staff make a request

- The following information will help to determine if it is necessary to make a FFCP request, and which part of the MASH request form to use:
- Lewisham's Threshold Guidance will help to assess the level of support needed or risks present. **Professionals should refer to this guidance before making a FFCP request. This, along with some brief guidance, can be found on the FFCP webpage and the LSCP website, links below.**
- If staff believe a child and their family need some additional support this should be **discussed with the family first** and agree who is best placed to provide that support. An Early Help Assessment can help to get a full picture of the family's situation and plan how to meet that need.
- If it is believed a child or family has needs at the targeted level, which are not being met by services currently involved with the family, the form can be completed to **request help and support** from the FFCP.
- If professional working with a child requires supporting information from Children's Social Care (e.g. CAFCASS, probation, housing conducting statutory safeguarding checks, assessments), the form can also be completed to **request supporting information.**
- If there is any worry that a child is at risk of significant harm through abuse or neglect, staff should call the FFCP immediately on 020 8314 6660 to discuss their concerns and then use the form to **request child protection** from the FFCP

FFCP / Early Help Consultation Service

To help professionals make the most informed decisions the FFCP and Early Help Team will provide a professionals' advice line. This will be available for consultation from 9am – 5pm.

Where the child may need help and protection they will be given advice and guidance about making a referral, including how to involve parents. Professionals will also receive guidance on the need for parental consent/ recorded clarification needed as to why consent was overridden.

During consultation professionals, should:

- Be clear about their concern and what is needed from the consultation
- Clearly identify what their organisation has already done about the concern and the impact of this
- Seek clarification where there are any uncertainties about what is involved
- In the case of the outcome of consultation being to make a referral, discuss the appropriateness of not seeking, or overriding parental consent.

The Consultation service aims to:

- Offer quick access via the telephone to Children's Safeguarding and Social Care advice
- Provide advice on Children's Safeguarding and Social Care threshold decision making i.e. S17 or S47 of the CA 1989
- Improve information sharing about universal and target services providing early help

- Allow professionals the opportunity to talk through situations (hypothetically if necessary) of concern to help determine an appropriate response, without the need for formal referral. This advice will be recorded to provide an audit trail.

How the Consultation Service works?

- Consultation will be offered by FFCP Social worker/ Early help team and their professional partners for all professionals seeking advice about children who they are concerned about
- To undertake a consultation, professionals should telephone the FFCP / Early Help team on 0208 314 6660. Professionals have the option to speak with their own service colleagues co-located in the FFCP; who in turn will always be able to seek advice and guidance from social workers
- When concerns are raised about a child (ren) the FFCP / Early Help hub will record the consultation as a contact on the EHM database checking the child's details to ensure appropriate identification. An analysis of need, harm and risk issues will be carried out to provide early action, diversion or intervention to the child and his/ her family. Consent on these cases will always be recorded and considered
- Where professionals simply seek advice and or guidance on hypothetical cases they feel stuck with, the FFCP or Early help staff members who provides the consultation will send an email as a follow up action and with the advice recorded. It is expected that the contacting professional follow the record keeping and information guidelines for their own agency, to record they have held a consultation. With hypothetical queries the FFCP / Early Help team will not contact the family but do expect professionals to discuss any concerns they have with the individuals who have parental responsibility for the child
- Professionals and their agencies are not obliged to follow the advice offered, however staff within the FFCP/ Early Help team will escalate concerns in line with the London Safeguarding Children Procedures where they feel safeguarding activity is required and advice is not followed
- If following consultation more information becomes known or the situation changes, a professional can seek further clarity by calling the consultation line at any time.
- Alternatively, if they feel that the response they have received does not meet the needs of the child/family or leaves a child at risk of harm, they can still make a referral in the usual way or escalate their concerns through their organisation's safeguarding process.

Using the Local Children Safeguarding Partnership (LSCP) Thresholds for Intervention guidance

The Lewisham Safeguarding Children Partnership (LSCP) has developed a document following consultation with partners for professionals to determine the levels of need when making a judgement and assessment of the child and their family. This document provides advice and guidance regarding the level of support and intervention children and their families may require.

Before making a referral to the FFCP professionals should consider if the needs identified can be met within their own agency, or by other professionals already

involved with the family. This is usually relevant for children who have universal or additional needs, this is often referred to as Level 1 or 2 support as demonstrated in the Thresholds Guidance.

Professionals should seek to discuss any concerns they have with the parents/carers who have parental responsibility, are caring for the child by way of private fostering arrangements (or under a statutory regulation) and inform them that they are making a referral to the FFCP when new safeguarding concerns arise or no change is affected within existing plans. This should only be done where such discussions will not place a child at increased risk of significant harm or cause any significant delay.

The Thresholds for Intervention Guidance can be accessed HERE

Identifying a child in need of help/ support or protection

A referral to the FFCP should be made when a child or family needs support identified require Level 3 or 4 support in the Thresholds Guidance. Additional information including the link to the online request from can be found on the Lewisham FFCP Webpage:

www.lewisham.gov.uk/MASH

Contact:

Family First Contact Point (FFCP) Tel: 020 8214 6660

Email: mashagency@lewisham.gov.uk

Opening hours: Monday–Friday 9am–5pm.

If you have concerns about the welfare of a child outside these hours, please contact the emergency duty team on 020 8314 6000 and ask to speak to the out-of-hours duty social worker

3.12 Female genital mutilation (FGM)

At Twin Oaks Primary School, we believe that all our pupils should be kept safe from harm. FGM affects girls particularly from north African countries, including Egypt, Sudan, Somalia and Sierra Leone.

It is illegal in the United Kingdom to allow girls to undergo female genital mutilation either in this country or abroad. People guilty of allowing FGM to take place are punished by fines and up to fourteen years in prison.

At Twin Oaks Primary School, we have a duty to report concerns we have about girls at risk of FGM to the police and social services.

FGM occurs mainly in Africa and to a lesser extent, in the Middle East and Asia. Although it is believed by many to be a religious issue, it is a cultural practice. There are no health benefits.

Communities particularly affected by FGM in the UK include girls from:
Somalia, Kenya, Ethiopia, Sierra Leone, Sudan, Egypt, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

In the UK, FGM tends to occur in areas with larger populations of communities who practice FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include: London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes. In England and Wales, 23,000 girls under 15 could be at risk of FGM.

Key Points:

- Not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old; but up to around 15
- Criminal offence in UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

Reasons for this cultural practice include:

- Cultural identity – An initiation into womanhood
- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – unmutilated women are regarded as unclean

Risk Factors include:

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

High Risk Time

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Schools should be alert to the possibility of FGM as a reason why a girl in a high-risk group is absent from school or where the family request an 'authorised absence' for just before or just after the summer school holidays. Although, it is difficult to identify girls before FGM takes place, where girls from these high-risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

Post-FGM Symptoms include:

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

Longer Term problems include:

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses

- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

At Twin Oaks Primary School if we have concerns about FGM, we will discuss these with parents/carers where appropriate, and the young person concerned, before taking any further action. In cases where it is deemed likely that discussing preliminary concerns with the family may put a child(ren) at risk of any kind, we may not discuss this with parents/carers before reporting to the relevant authorities.

3.13 Forced Marriage/Honour Based Abuse

It is now a criminal offence for any person to cause a child to enter into marriage before their 18th Birthday, whether or not they used violence, threats or any other form of coercion or deception. A child who is being forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Significant harm is defined as a situation where a child is suffering, or is likely to suffer, a degree of physical, sexual and / or emotional harm (through abuse or neglect), which is so harmful that there needs to be compulsory intervention by child protection agencies into the life of the child and their family.

The reasons given by parents who force their children to marry include protecting their children, building stronger families, strengthening family links, protecting family honour (e.g. promiscuity or homosexuality), retaining or acquiring wealth, appeasement etc.

Suspicions that a child may be forced into marriage may arise in a number of ways, including:

- A family history of older siblings leaving education early and marrying early;
- Depressive behaviour including self-harming and attempted suicide;
- Unreasonable restrictions such as being kept at home by their parents ('house arrest') or being unable to complete their education;
- A child being in conflict with their parents;
- A child going missing / running away;
- A child always being accompanied including to school and doctors' appointments;
- A child talking about an upcoming family holiday that they are worried about, fears that they will be taken out of education and kept abroad; or
- A child directly disclosing that they are worried s/he will be forced to marry.

Information about a forced marriage may come from one of the child's peer group, a relative or member of the child's local community, from another professional or when other family issues are addressed, such as domestic violence between parents.

Situations where a child fears being forced into marriage have similarities with both domestic violence and honour-based abuse. Forced marriage may involve the child being taken out of the country (trafficked) for the ceremony, is likely to involve non-consensual and/or underage sex, and refusal to go through with a forced marriage has sometimes been linked to so-called 'honour killing'.

Professionals should respond in a similar way to forced marriage as with domestic violence and honour-based abuse (i.e. in facilitating disclosure, developing individual safety plans, ensuring the child's safety by according them confidentiality in relation to the rest of the family, completing individual risk assessments etc).

3.14 Domestic Abuse (Previously Domestic Violence - DV)

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

In extreme cases this could include murder.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

3.14.1 Children and young people witnessing domestic abuse

Witnessing domestic abuse is child abuse. Living in a home where domestic abuse happens can have a serious impact on a child or young person’s mental and physical wellbeing, as well as their behaviour. It is really distressing and scary for a child, and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse
- hear the abuse from another room
- see a parent's injuries or distress afterwards
- be hurt by being nearby or trying to stop the abuse

3.14.2 Teenagers experiencing domestic abuse

Domestic abuse can happen in any relationship, and it affects young people too.

They may not realise that what's happening is abuse. Even if they do, they might not tell anyone about it because they're scared of what will happen, or ashamed about what people will think.

It's often difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around.

Children who witness domestic abuse may:

- become aggressive
- display anti-social behaviour
- suffer from depression or anxiety
- not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

Where potential cases of Domestic Violence are identified, the school will conduct an assessment using the Domestic Abuse Stalking and Harassment (DASH) Risk Indicator Checklist. If a case causes enough concern following this assessment, the Designated Safeguarding Lead (DSL), will make the necessary referral(s) on to other appropriate agencies.

3.14.3 Operation Encompass

At Twin Oaks Primary School, we are working in partnership with the Metropolitan Police and Lewisham Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass.

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

Encompass has been created to address this situation. It is the implementation of key partnership working between the police and schools. The aim of sharing information with local schools is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment.

In order to achieve this, the Lewisham Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our pupils has been present, with the Designated Safeguarding Lead and the Headteacher (DSL). On receipt of any information, the DSL will decide on the appropriate support the child requires, this could be silent or overt dependent on the needs and wishes of the child. All information sharing and resulting actions will be undertaken in accordance with the Metropolitan Police and Lewisham MASH Encompass Protocol Data Sharing Agreement. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The purpose and procedures in Operation Encompass have been shared with all parents and governors, is detailed as part of the school's Safeguarding Policy and published on our school website.

At Twin Oaks Primary School our Key Adults are Lisa Shearsby and Karen Cartwright

3.15 Child sexual exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where 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 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

A common feature of CSE is that the child or young person does not recognise the coercive nature of the relationship and does not see themselves as a victim of exploitation. This means that they are unlikely to report the abuse so police and partners must be alert to the signs of CSE and actively look for victims. CSE can also occur through the use of technology without the child's immediate recognition; for example, being persuaded to post images on the internet/ mobile phones without immediate payment or gain.

Staff should be aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

Inappropriate relationships:

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or 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 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.

If colleagues have concerns about any students at risk of CSE, they should ensure that their concerns are passed promptly on to the DSL so that a referral is made to the Concerns Hub. Any school can complete the referral form by sending a request to PLMailbox-ConcernHub@met.police.uk

3.16 Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- In exchange for something the victim needs or wants, and/or
- The financial or other advantage of the perpetrator or facilitator and/or
- Through violence or the threat of violence

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

If colleagues have concerns regarding any students at risk of CCE, they should ensure that their concerns are passed promptly on to the DSL.

3.17 County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of ‘deal line’.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations.

Staff should be aware of some of the key indicators of children who are involved in county lines, including:

- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education or not taking part in education;
- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in county lines;
- Having older friends
- Mood swings or changes in emotional wellbeing; and
- Drug and/or alcohol misuse

If colleagues have concerns about any students at risk of county lines, they should ensure that their concerns are passed promptly to the DSL so that a referral is made to the Concerns Hub. Any school can complete the referral form by sending a request to PLMailbox-ConcernHub@met.police.uk

3.18 Organised exploitation and trafficking

Trafficking involves the recruitment, transportation and exploitation of women and children for the purposes of prostitution and domestic servitude across international borders and within countries

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.

Also, modern slavery encompasses human trafficking, as defined in the UN Palermo Protocol and the Council of Europe Convention and as made illegal in UK legislation under the Sexual Offences Act 2003 and the Asylum and Immigration (Treatment of Claimants) Act 2004. It also includes cases of slavery and servitude as made illegal in the Coroners and Justice Act 2009, which criminalises holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour. When referring to modern slavery, it encompasses all of the forms of human trafficking, slavery and servitude that have been defined in national and international laws and agreements.

Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events. These include a child who:

- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for playing
- is orphaned or living apart from their family, often in unregulated private foster care
- lives in substandard accommodation

- isn't sure which country, city or town they're in
- is unable or reluctant to give details of accommodation or personal details
- might not be registered with a school or a GP practice
- has no documents or has falsified documents
- has no access to their parents or guardians
- is seen in inappropriate places such as brothels or factories
- possesses unaccounted for money or goods
- is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt
- has injuries from workplace accidents
- gives a prepared story which is very similar to stories given by other children.

Our procedures for responding to concerns about students at risk of or victims of modern slavery are informed by the statutory DfE guidance 'Care of unaccompanied migrant child and child victims of modern slavery, published in November 2017. All concerns about students who may be being trafficked should be passed straight to the DSL on our standard concerns form.

3.19 Child on Child abuse

Child on child abuse can take many forms including physical (including hitting, kicking, shaking, biting, hair pulling etc.), sexual (e.g. inappropriate touching) and emotional abuse (including bullying & cyberbullying). Department for Education (DfE).

KCSIE 2026 highlights misogyny as a significant safeguarding risk, recognising its escalatory nature and its role as a contributing factor in harmful sexual behaviour, sexual harassment and sexual violence between children. Staff should be alert to misogynistic attitudes and language, including those linked to online content, and should not dismiss this as harmless 'banter'. Concerns of this nature should be reported to the DSL so that early, preventative action can be taken before behaviours escalate.

September 2026: Keeping children safe in education; statutory guidance for schools and colleges, makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up. The Equality Act 2010 replaced previous anti-discrimination laws with a single Act.

A key provision was a new public sector Equality Duty, which came into force on 5 April 2011. This requires the school/college to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it.

Child on child abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing

what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities).

At Twin Oaks Primary School, we believe that all children have the right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour and Anti-Bullying Policies were necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Child Protection issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. KCSIE 2026 defines a form of child on child abuse described as "upskirting", which 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".

At Twin Oaks Primary School, we are committed to supporting victims of child-on-child abuse by adhering to the DfE guidance in KCSIE 2026.

In addition, Twin Oaks Primary School uses the Brook Traffic Light Tool to help staff identify, understand and respond appropriately to sexual behaviours in children and young people. The tool supports staff to recognise and identify sexualised behaviours and differentiate between those which are part of healthy sexual development and those which are problematic or harmful. It helps us to understand what a behaviour may be communicating and why the child or young person may be exhibiting the behaviour enabling us to respond appropriately to sexualised behaviours, considering possible motivations, communications and severity.

3.19.1 Child to Parent or Caregiver Abuse

The school recognises that abuse can also involve children causing harm to adults, including their parents or carers. This is sometimes referred to as child to parent or

caregiver abuse and may involve physical violence, verbal or emotional abuse, coercive or controlling behaviour, threats, intimidation, financial abuse or damage to property. Such behaviour can have a significant impact on the safety and wellbeing of family members and may indicate that the child has unmet needs, has experienced trauma or abuse, or requires additional support. Staff should not view these incidents simply as behavioural issues but should consider the wider safeguarding context. Any concerns will be reported to the Designated Safeguarding Lead (DSL), who will assess the child's needs, consider the safety of all family members and, where appropriate, make referrals for community-based early help, Targeted Early Help (Family Help) or Children's Social Care in accordance with Lewisham's Multi-Agency Threshold Guidance.

3.20 Making or sharing of nudes or semi-nudes

In line with KCSIE 2026, we no longer use the terms ‘sexting’, ‘indecent’ or ‘nude/semi-nude images (also known as sexting or youth produced sexual imagery)’. Instead we refer to the ‘making or sharing of nudes or semi-nudes’. Any incident involving the making or sharing of nudes or semi-nudes requires a safeguarding response and will be referred to the DSL, whether or not the images were shared consensually. This definition includes images that are digitally altered or wholly generated using artificial intelligence, including so-called 'deepfakes' or 'deep nudes'. Any concern involving an AI-generated or AI-manipulated nude or semi-nude image of a child, whether or not a real photograph was ever taken or shared, is treated as seriously as any other image-based safeguarding concern and reported to the DSL immediately. We follow the UK Council for Internet Safety guidance ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’.

https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

3.21 Preventing Radicalisation

‘Channel’ and ‘Prevent’

Terrorism is defined in KCSIE 2026 as “an action that endangers or causes violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause”.

As part of the Counter Terrorism and Security Act 2015, schools have a duty to ‘prevent people being drawn into terrorism’. This has become known as the ‘Prevent Duty’. Channel, a key element of the Home Office’s “Prevent” strategy, is a multi-agency approach to protect people at risk from radicalisation. As a school we will work with the local authority, local law enforcement, and religious and community leaders, to identify children vulnerable to radicalisation, and to stamp out extremism if it arises. This includes identifying pupils:

- Displaying feelings of grievance and injustice
- Feeling under threat
- Searching for identity, meaning and belonging
- Who have a desire for status amongst their peers
- Shows empathy for extremist causes

- Glorifying violence, especially other faiths or cultures
- Who have a desire for excitement and adventure
- Displaying a need to dominate and control others
- Who have a susceptibility to indoctrination
- Displaying a radical desire for political or moral change
- Who are susceptible to opportunistic involvement
- Who have family or friends involved in extremism
- Susceptible to being influenced or controlled by a group
- With relevant mental health issues
- Secretive behaviour
- Advocating messages similar to illegal organisations or other extremist groups

We will always take allegations and concerns of radicalisation and/or terrorism seriously. We will help pupils channel their desire for excitement and adventure into suitable and healthy activities. Radicalisation and extremism can be wider than religious beliefs and linked affiliations and can include radicalisation around far right groups and also by criminal groups connected with gang activity.

We will work with local religious and cultural organisations to instil a strong sense of identity in our pupils, as well as a clear place and purpose within the school. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We will establish appropriate filters to protect children from terrorist and extremist material online.

Our school is stronger thanks to our open, multi-cultural and multi-faith community. We will always aim to integrate and engage every child within the school community, and in the wider community.

We will celebrate a range of different religious and cultural festivals across the year, giving every child the opportunity to take part.

We will monitor and assess incidents which suggest pupils are engaging, or are at risk of engaging in, extremist activity and/or radicalisation.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised in any way, they should discuss this with the DSL.

4.0 Safer Working Practice

4.1 Safer Recruitment

Twin Oaks Primary School recognises that sometimes people who want to cause harm to children actively seek employment that provides them access to young people.

The school will protect our pupils from having to come into contact with people with the propensity to cause harm by thorough and rigorous scrutiny of all applications. We will:

- Verify applicant's identity
- Check applicant's qualifications/experience/ employment/history
- Obtain professional and character references

- Check applicant's health and physical capacity to undertake the job
- Hold a face-to-face interview for all candidates with at least one member of the Twin Oaks Primary School panel who has attended safer recruitment training
- Ensure all adults in regulated activity with the children have been DBS checked and barred list checked.
- Make staff aware of their contractual, legal, administrative and pastoral responsibilities. A key document to support staff's understanding in this area is 'Keeping Children Safe in Education' (2026) which will be made available to all staff.

In recruiting and appointing staff, the Headteacher and the School's Governing body have key responsibilities to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children.

4.2 Employees: Advertising / Shortlisting / Interviews

We ensure that the advertisement makes clear the school's commitment to safeguarding and promoting the welfare of children.

All job descriptions make reference to the responsibility for safeguarding and promoting the welfare of children.

All person specifications include specific reference to suitability to work with children.

We ask for written information about previous employment history and check that information is not contradictory or incomplete. If a candidate for a teaching post is not currently employed as a teacher, we will check with the school, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

We will always seek at least two references to obtain objective and factual information to support our appointment decisions. These will be scrutinised and any concerns need to be resolved satisfactorily, before the appointment can be confirmed.

We endeavour to seek references on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

We will always request references directly from the referee and employers and will not rely on open references, for example in the form of 'to whom it may concern' testimonials.

On receipt, references will be checked by the Head Teacher to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate: for example, if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any information about past disciplinary action or allegations will be considered carefully when assessing the applicant's suitability for the post; including information obtained from records held on the Database of Qualified Teachers (DQT). The DQT

is maintained by the Teaching Regulation Agency (TRA) which is an executive agency of the Department for Education (DfE).

We verify that the successful applicant has all the academic or vocational qualifications claimed.

We check his or her previous employment history and experience.

We conduct a face-to-face interview that explores the candidate's suitability to work with children as well as his or her suitability for the post.

We verify the successful applicant's identity, when they arrive for an interview.

4.3 Offer of appointment

An offer of appointment to a successful candidate, including one who has lived or worked abroad, will be conditional upon satisfactory completion of our pre-employment checks.

Before new staff are appointed, we will:

- Verify a candidate's identity from current photographic ID and proof of address;
- Obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity;
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- Check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the NCTL Teacher Service Portal (formerly known as the Employer Access Online service);
- Verify the candidate's mental and physical fitness to carry out their work responsibilities. This is done through the council's occupational health services;
- Verify professional qualifications, as appropriate.

4.4 Additional checks on individuals who have lived or worked outside the UK:

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff. In addition, we will make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered.

We will verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, we will follow the council's guidance and the advice on the GOV.UK website.

All schools have a statutory duty under the new Home Office guidance issued on 6 April 2017, which states that:

"All Tier 2 (General) visa applicants who want to work in specified health, education or social care sectors must provide a criminal record certificate and so for all new appointments, schools must consider additional checks, including obtaining a Certificate of Good Conduct, where staff have ever lived or worked abroad".

The requirement is applicable to **all** *Tier 2 (General) staff from any country (excluding the United Kingdom and Northern Ireland),where an individual has lived

or worked for more than 12 months+ either in total or continuously as well as within the previous 10 years.

Overseas Criminal Record Checks

In Lewisham, all new employees who declare that they have lived or worked outside the UK for **12 months or more (either continuously or cumulatively) since the age of 18** will be subject to an overseas criminal record check, where this is available and appropriate.

The school recognises that it is not always possible to obtain overseas criminal record information due to differences in national systems, availability of records, language barriers, or where a country does not provide a suitable checking process. Where an overseas criminal record check cannot be obtained, the school will complete a **risk assessment** to consider the circumstances, the role being undertaken, the individual's employment history, and any other available safeguarding information.

The school will retain evidence of all reasonable attempts made to obtain overseas criminal record information, including correspondence, applications, responses and any reasons why information could not be obtained. This evidence, along with the completed risk assessment and any decision-making records, will be securely retained within the employee's personnel file.

The school will ensure that recruitment decisions continue to follow safer recruitment principles and that appropriate safeguarding measures are considered before an individual begins regulated activity with children.

It is not a legal requirement for existing staff who have ever lived or worked abroad for 12 months+ in total or continuously since the age of 18 years, but the governing body and senior leadership at Twin Oaks Primary School have made the decision that we will risk assess existing staff to make a decision whether or not we will pursue overseas criminal records checks for existing members of staff, volunteers or governors.

4.5 Additional online checks for shortlisted candidates

As part of the shortlisting process we may consider carrying out an online search for shortlisted candidates. This may help identify any incidents or issues that have happened, which are publicly available online which may be explored with the applicant at interview.

4.6 Single Central Record (SCR)

We keep a SCR for the school. Generally, the information to be recorded is whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed and by whom:

- an identity check;
- a barred list check;
- an enhanced DBS check;
- a prohibition from teaching check;
- further checks on people living or working outside the UK;
- a check of professional qualifications; and

- a check to establish the person's right to work in the United Kingdom.

The SCR will cover the following people:

- all staff (including supply staff) who work at the school
- all others who work in regular contact with children in the school including volunteers.
- Governors

In order to comply with the requirements of the Data Protection Act, we will not retain a copy of the individual's Disclosure and Barring Service (DBS) Certificate. However, copies of other documents used to verify the successful candidates' identity, right to work and required qualifications will be kept on their personnel file.

4.7 Visiting Professionals/Agency Workers/Third Party Staff

We only use supply agencies that are able to provide full written vetting information about their staff prior to them starting work at the school.

The vetting information must contain the following:

- ID Checked
- Teaching Agency Check
- Qualification Evidence
- Medical Check
- Barred List Check and Date
- Valid DBS Date
- Enhanced DBS number
- Further Disclosure Information, if necessary
- Right to work in the UK Check
- Overseas Checks/Risk Assessment
- References Check
- Confirmation of Level 1 safeguarding training within the last 12 months

We ask supply agencies to email the vetting information to the School Business Manager as well as to the school receptionist

The school's receptionist checks this evidence on arrival, checking that the person presenting themselves for work is the same person on whom the checks have been made.

Any discrepancies will be reported to the Business Manager immediately and the agency staff will not be able to start their work until satisfactory checks have been concluded.

Safer recruitment records of regular agency workers are included in the school's SCR.

We provide an induction for supply staff, which includes safeguarding and a briefing on any vulnerable children they will be working with.

4.8 Trainee/Student Teachers

Initial Teacher Training Students, e.g. Schools Direct Students, who are salaried by the school, have to undergo the same safer recruitment checks as regular staff, before they can start working for the school.

Safer Recruitment records for Initial Teacher Training Students, e.g. Schools Direct Students, who are salaried by the school, are included in the school's Single Central Record.

Where trainee teachers are fee-funded, it is the responsibility of the Training Provider to carry out the necessary checks.

4.9 Regulated Activity

A person will be considered to be in 'regulated activity' if as a result of their work they:

- will be responsible, on a frequent basis (more than 3 days in a 30-day period, or overnight), for teaching, training, instructing, caring for or supervising children, or providing advice or guidance on their physical, emotional or educational wellbeing, or driving a vehicle only for children; or
- provide relevant personal care or healthcare, or any overnight activity, even if this happens only once; or
- carry out any other paid work in the school on more than 3 days in a 30-day period, or overnight, with the opportunity for contact with children.

Important change for 2026: the Crime and Policing Act 2026 has removed the 'supervision exemption' from regulated activity. Previously, a supervised volunteer teaching, training, instructing or supervising children on a regular basis was not in regulated activity. This exemption no longer applies. Any person, paid or unpaid (including volunteers), carrying out these activities on more than 3 days in a 30-day period, or overnight, is now in regulated activity and requires an enhanced DBS check with children's barred list information, regardless of whether they are supervised.

Any member of staff, volunteer or governor that will be working in regulated activity will have a barred list check carried out.

All visiting professionals e.g. PE coaches, Music teachers, Health Professionals and LA advisors have to provide the school with their valid enhanced DBS details.

All kitchen staff have to provide the school with their valid enhanced DBS details. It is the responsibility of the Catering Contractor to carry out the necessary checks.

All kitchen staff's safer recruitment records are included in the school's SCR.

All cleaning staff have to provide the school with their valid enhanced DBS details. It is the responsibility of the Cleaning Contractor to carry out the necessary checks.

All cleaning staff's safer recruitment records are included in the school's SCR.

All Breakfast Club and After School Club Personnel have to provide the school with their valid enhanced DBS details. It is the responsibility of the Extended School providers to carry out the necessary checks.

All Extended School personnel's safer recruitment records are included in the school's SCR.

It is the responsibility of the Business Manager to make sure all enhanced DBS checks are current and recorded.

4.10 Volunteers E.g. Parents/Carers

As per the guidance in Keeping Children Safe in Education 2026, all volunteers will be risk assessed to determine whether they require a DBS and whether or not this will need to include a barred list check should their role require them to be in regulated activity. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Important change for 2026: the 'supervision exemption' has been removed

Previously, a volunteer who was directly supervised by a member of staff was not in regulated activity, however frequently they helped. The Crime and Policing Act 2026 has removed this exemption. Any volunteer whose role involves teaching, training, instructing or supervising children on more than 3 days in a 30-day period, or overnight, is now in regulated activity regardless of whether they are supervised, and we will obtain an enhanced DBS certificate with children's barred list information for them. Where a regular volunteer helps at more than one setting and, between them, meets this threshold, we will work with the other setting(s) to agree who obtains the check, and the volunteer may supply that information to each setting.

Existing volunteers who move into regulated activity as a result of this change (from 1 September 2026) will have their children's barred list status checked, either through a new enhanced DBS certificate with barred list information, or, where the volunteer already holds a recent enhanced DBS certificate without barred list information and there has been no break in service, through a standalone barred list check.

For volunteers who are not in regulated activity, for example someone helping on an occasional or one-off basis (such as accompanying a single school trip), there is no requirement for an enhanced DBS check, and a barred list check must not be requested as this is not legally permitted.

The school may still choose to request a standard or enhanced DBS check (without barred list information) for a volunteer not in regulated activity, where this is judged necessary following a written risk assessment considering the nature of the role, what is already known about the volunteer, and whether the volunteer has other roles or references that speak to their suitability.

Under no circumstances should a volunteer whose role involves regulated activity be allowed to start before the necessary checks are complete, except where they are appropriately supervised in line with DfE guidance while the enhanced DBS certificate is awaited.

4.11 School Governors

The school will apply for an enhanced DBS check for all members of the governing body. In addition to this, a risk assessment will be completed to ascertain if any members of the governing body are taking part in regulated activity with children. If it is determined that any person is taking part in regulated activity, a barred list check will be requested. They must do this by 1 September 2016 where a governor was elected before 1 April 2016 and within 21 days of appointment or election if a governor is elected or appointed after 1 April 2016.

All new governors will be asked to declare their overseas history and where necessary, complete a risk assessment. Existing governors will also/will not be

required to complete an overseas criminal history risk assessment in line with our agreed school procedures.

All governors must also undergo a s128 check to confirm any directions which may have been made against them by the Secretary of State. This check will be carried out using the NCTL Teacher Service Portal (formerly known as the Employer Access Online service).

All governors and trustees should receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

All governors and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, (including the Public Sector Equality Duty23), and their local multi-agency safeguarding arrangements

4.12 Contractors

The Receptionist and /or a member of the Premises Team will always check the identity of contractors upon their arrival in the school.

Contractors and contractors' employees for whom an appropriate DBS check has not been undertaken will be supervised by a member of the Premises Team, if they will have contact with children.

If a self-employed contractor is working at the school and will have unsupervised contact with children, the school will obtain an DBS check and/or barred list check as appropriate, as self-employed people are not able to make an application directly to the DBS on their own account.

4.13 General Visitors to the School

We will not request DBS checks and barred list checks, or ask to see DBS certificates, for general visitors, e.g. children's relatives attending events in the school, etc. Visitors to school will be expected to sign in using the school inventory system and wear a visitor's lanyard. Visitors who wear red lanyards have no DBS and therefore need to be escorted on the premises. Visitors wearing green lanyards have a valid DBS.

5.0 Staff Conduct

5.1 Safeguarding Training and Awareness

All staff will be supported to recognise the signs and symptoms of all forms of abuse and neglect, including physical abuse, emotional abuse, sexual abuse, exploitation, and other safeguarding concerns that may affect children and young people.

As part of their induction process, all new, temporary and supply staff will receive appropriate safeguarding information and training to ensure they understand the school's safeguarding procedures, their responsibilities, and how to report concerns.

All staff working in the school will be required to read and understand:

- the school's Safeguarding and Child Protection Policy;
- the Staff Code of Conduct;
- Keeping Children Safe in Education (2026) – Part One: Information for all school and college staff

Staff will be expected to understand the role they play in safeguarding children, including recognising concerns, responding appropriately, recording information accurately, and reporting concerns without delay to the Designated Safeguarding Lead (DSL).

All staff will receive child protection training at least annually with a particular focus on recognising signs of abuse, managing a disclosure as well as recapping monitoring and reporting procedures of abuse and suspected abuse. In addition, staff will receive regular training updates about safeguarding related issues.

The safeguarding training of third-party staff/contractors will be verified and if necessary, further training may be given as part of the induction process. Third party colleagues will also sign the Staff Code of Conduct. Should a child or a member of staff be concerned about another member of staff's conduct in relation to child protection then procedures are in place. All school staff should take care not to place themselves in a vulnerable position with a child. They should strictly adhere to the Department for Education and Skills (DfES) guidelines on teachers' behaviour and the school's policies.

5.2 Safer Working Practice

We make use of the Safer Recruitment Consortium document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.' May 2019 as the basis for our Code of Conduct. All staff are expected to follow the Twin Oaks Primary School Staff Code of Conduct and the expectations set out in the staff handbook (see Code of Conduct and Staff Handbook).

Staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for adults working with individual children to do so in view of other adults. If staff anticipate being in a situation that could be open to misinterpretation they should alert a senior manager in advance and inform the child's parent or carer. Staff should escort children of the same sex to the toilet but are not expected to be involved with toileting, unless the child has an additional need that has been brought to their attention by the parent/guardian and a strategy agreed in writing. We recognise that physical touch between adults and children in relation to the activity being provided is acceptable in public places.

5.3 Managing Allegations Against Staff

We understand that a parent/pupil/another staff member may make an allegation against a member of staff (including volunteers and supply staff). If such an allegation is made:

The member of staff receiving the allegation will immediately inform the Headteacher or the most senior DSL who must be part of the senior Leadership team if the Headteacher is not present.

The Headteacher or the senior teacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) for Child Protection. If the allegation made to a member of staff concerns the Headteacher,

the person receiving the allegation will immediately inform the Chair of Governors who will consult as above, without notifying the Headteacher first.

The School will follow the Lewisham Local Authority procedures in the LADO protocol, updated in May 2018, for managing allegations against staff, and statutory guidance 'Keeping Children safe in Education.' (2026)

Individuals who are the subject of allegations should be informed of these as soon as possible, as should the parents and carers of any children involved. However, every effort must be taken to maintain confidentiality, in order to comply with the reporting restrictions in the Education Act 2011.

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult the LADO for Child Protection, or the School's Personnel Officer.

The name of any member of staff considered not suitable to work with children will be given to the Department for Education Misconduct Team, with the advice and support of Education Personnel and in accordance with the Barring Regulations.

Any child making such an allegation will be treated sensitively and made to feel safe and listened to. If there are any immediate concerns of safety action must be taken to remove the child from harm. Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it.

Police need to be contacted at the earliest opportunity when a victim of a crime makes an allegation of serious sexual assault. Any delay will be likely to have a serious impact upon safeguarding/the reassurance of the victim and the securing all available evidence. Criminal procedures and considerations must be placed above internal disciplinary/suspension protocols in such instances.

5.4 Organisations or Individuals using school premises

Allegations relating to an incident when an individual or organisation was using school premises for the purposes of running activities for children, schools should follow their safeguarding policies and procedures, including informing the LADO.

5.5 Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in relation to children. If necessary, they should speak to the Designated Child Protection Governor or the Chair of Governors, or the LA Designated Child Protection Officer (LADO) via the DSL, if they are not the same person – see Whistleblowing Policy.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.

6.0 General Safeguarding

6.1 Health and Safety

Our Health and Safety policy, set out in a separate document, is reviewed annually by the governing body. It reflects the consideration we give to the protection of our

children both within the school environment and when away from the school when undertaking school trips and visits.

6.2 Attendance

Our policy on attendance is set out in a separate document and is reviewed annually by the governing body. Twin Oaks Primary School recognises that poor attendance can be an indicator that a child is experiencing abuse. The attendance officer (Rebecca Price) and senior leadership team monitor attendance weekly and report concerns to the Attendance & Welfare Officer at regular meetings.

Twin Oaks Primary School has enrolled in a programme called 'Study Bugs' to monitor children's attendance. The recorded data will be accessible to the Local Authority, in line with the new requirement from the DfE in Working together to improve school attendance - GOV.UK (www.gov.uk) (August 2024). The objective is to share this information with the local authority in a bid to support the improvement of school attendance and the provision of the most appropriate support.

6.3 Information Sharing of Child Protection Files

Where children leave Twin Oaks Primary School (including in year transfers), the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. In addition to this, the Designated Safeguarding Lead may also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

6.4 Online Safety, Digital Safeguarding and Mobile Technology

We ensure pupils at Twin Oaks Primary School are protected while using digital technologies at the school. The school is committed to including digital technologies, in particular, internet use, in our curriculum. In so doing we recognise the inherent risks posed by this useful learning tool. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme. Full compliance with the school Digital Safeguarding policy will mitigate these risks and help to ensure pupils are safe online.

Mobile Phone Policy

In line with KCSIE 2026 and DfE statutory guidance on mobile phones in schools, twin Oaks Primary School is a mobile phone-free environment by default. Pupils do not have access to their mobile phone during the school day, including lessons, time between lessons, breaktimes and lunchtime. Mobile phones and smart watches are handed to the class teacher/office on arrival to school and then given back at the end of the day. Phones are locked away throughout the school day.

Generative AI

We recognise the growing use of Generative AI by children and staff, and the associated safeguarding, data protection and intellectual property risks highlighted in

KCSIE 2026. Staff and pupils are supported to use AI safely and effectively in line with DfE guidance and training materials on the safe and effective use of Generative AI in education, and any concerns about AI-generated or AI-manipulated content, including sexual imagery of children, are treated as child sexual abuse material and reported to the DSL immediately.

6.5 Filtering and Monitoring Systems

As part of our statutory responsibility to safeguard and promote the welfare of all pupils, Twin Oaks Primary School is committed to providing a safe online environment that supports effective teaching and learning while protecting children from online risks.

In line with DfE guidance, the governing body ensures that robust filtering and monitoring systems are in place to limit children's exposure to harmful and inappropriate content through the school's IT systems. These systems are reviewed regularly to ensure their effectiveness, and updates are made in response to new risks, changing technology, or emerging guidance.

The leadership team and relevant staff are expected to:

- Be aware of the filtering and monitoring systems in place.
- Understand how these systems function and how to manage them effectively.
- Know how to escalate any concerns arising from online activity.

When reviewing filtering and monitoring arrangements, the school considers:

- The number and age range of pupils.
- The specific needs of vulnerable pupils who may be at greater risk of harm.
- The frequency and ways in which pupils access the school’s IT systems.
- The school follows the Department for Education’s Filtering and Monitoring Standards, which recommend that schools:
- Clearly identify and assign roles and responsibilities for managing filtering and monitoring.
- Review the systems and provisions at least annually.
- Block harmful and inappropriate content without unnecessarily restricting access to learning resources.
- Implement effective monitoring strategies that are appropriate to the school’s safeguarding needs.
- We use the DfE’s ‘Plan Technology for Your School’ self-assessment tool to evaluate our current provision and receive tailored recommendations for improvement.
- The governing body regularly reviews these standards and works in collaboration with IT staff and service providers to ensure continued compliance and protection for all users of the school’s digital infrastructure.

6.6 Anti-Bullying Policy

Our policies on anti-bullying and cyber-bullying are set out in separate documents and are reviewed annually by the governing body. We expect staff to acknowledge that to allow or condone bullying, constitutes a lack of duty of care, which may lead to consideration under child protection procedures.

Both policies are written in line with advice and statutory guidelines set out in the DfE guidance *Preventing Bullying*, in July 2017 and *Approaches to Preventing and Tackling Bullying*, June 2018.

6.6.1 Supporting Children Who Are Questioning Their Gender

The school recognises that some children and young people may question their gender identity. Staff will respond to all children with dignity, respect, sensitivity and compassion, ensuring that the child's welfare remains paramount in accordance with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026).

The school recognises that some younger children may go through a period of questioning their gender and that, for many, this may not continue into adulthood. Staff will avoid making assumptions and will take time to understand the child's views, wishes and feelings through a supportive, professionally curious and safeguarding-informed approach.

Children who are questioning their gender may experience a range of vulnerabilities, including bullying, discrimination, social isolation, anxiety, self-harm, poor mental health or other complex psychosocial needs. Any safeguarding concerns will be considered within the wider context of the child's circumstances, and appropriate support will be offered or referrals made where necessary.

The school will:

provide a safe, respectful and inclusive environment where all pupils are treated with dignity;

- take a robust and proactive approach to preventing and responding to all forms of bullying, harassment, discrimination and prejudice;
- avoid reinforcing rigid gender stereotypes through its policies and practice wherever possible;
- ensure that any safeguarding concerns are reported to the Designated Safeguarding Lead (DSL);
- work closely with parents or carers wherever appropriate and involve them in decisions relating to support for their child unless doing so would place the child at increased risk of harm or compromise their safety;
- consider requests for support on an individual basis, taking account of safeguarding responsibilities, the child's best interests, relevant legislation and statutory guidance.

Requests Relating to Social Transition

Where a child or their parent/carer requests support relating to social transition, the school will consider each request carefully on a case-by-case basis. Decisions will not be made by individual members of staff but through the school's established decision-making processes, led by the Headteacher and Designated Safeguarding

Lead, with appropriate involvement of parents or carers unless there are safeguarding reasons why this would not be appropriate.

The school will:

- carefully assess the safeguarding implications of any request;
- consider the child's wishes and feelings alongside their age, understanding and individual circumstances;
- seek appropriate advice where necessary;
- document the decision-making process and maintain accurate records;
- review decisions regularly to ensure support remains appropriate and in the child's best interests.

No member of staff should agree to or implement changes relating to a child's social transition without the school's agreed decision-making process being followed.

The school also recognises that a child's views or circumstances may change over time. Requests to review previous decisions or support a child who wishes to detransition will be considered sensitively, with appropriate safeguarding support and involvement of parents or carers where appropriate.

Single-Sex Facilities

In accordance with statutory guidance, pupils will use toilets, changing rooms and shower facilities designated for their biological sex.

Where a pupil who is questioning their gender does not wish to use these facilities, the school will consider whether suitable alternative arrangements can be provided, where reasonably practicable. Any alternative arrangements will not compromise the safety, privacy, dignity or wellbeing of the pupil concerned or other pupils.

Where mixed-sex toilet facilities are provided, the school will ensure appropriate safeguarding measures are in place and undertake regular risk assessments to maintain the safety and privacy of all users.

The school will keep appropriate records of any agreed arrangements and review these regularly.

Physical Education and Sport

The school is committed to ensuring all pupils can participate safely in physical education and sporting activities.

Where activities require separation by biological sex for reasons of safety, fairness or the nature of the sport, pupils will participate in accordance with statutory guidance. Where there are no safety considerations and a pupil requests support relating to participation, the school will consider the request individually through its safeguarding and decision-making processes, balancing the rights, safety and wellbeing of all pupils.

Throughout any decision-making process, the school will continue to comply with its safeguarding responsibilities and its duties under equality and human rights legislation.

6.7 Physical Intervention

Our policy on physical intervention by staff is referred to in the Behaviour Management policy and is reviewed annually by the governing body. We acknowledge that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimum force necessary to prevent injury to themselves, another person or property. Individual Risk Assessments are completed for particular pupils who have a higher likelihood of needing physical intervention and/or restraint and staff who work closely with these students are provided with additional Positive Handling training.

6.8 School Visits

We have clear protocols in place to ensure the safety of children whilst on school trips (see visits and trips policy). These include:

- Visit procedures to be documented by staff and agreed with the Educational Visits Coordinator (The Headteacher)
- A briefing for parents going on the trips including detailed information about complying with safeguarding responsibilities and what to do if a child discloses to them
- Defined roles and responsibilities for school staff
- Risk assessments
- DBS/barred list checks for parents/carers where appropriate

6.9 Looked After Children (LAC)

Our Headteacher and our Designated Teacher **(DT)** are responsible for Looked After Children and ensure that appropriate staff have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. The Headteacher and the SENDCO also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The **DT** for Looked After Children has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

The Chair is the designated Governor for Looked After Children **(CLA)**.

A separate policy sets out our systems and procedures in relation to CLA, which has been written with reference to the two statutory DfE guidance documents, 'Designated Teacher for looked after and previously looked after children' and 'Promoting the education of looked after and previously looked after children' released in February 2018.

6.10 Children Missing/Absent from Education

- Children absent from education are on the school roll, but are regularly not attending
- Children missing education aren't on any school roll or being educated elsewhere
- These are vital warning signs of safeguarding risks to a child

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so,

the identity of children of compulsory school age who are missing education in their area. A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in the future.

Twin Oaks Primary School places a great emphasis on regular and punctual attendance and we promptly follow up any unexplained absence. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Twin Oaks Primary School has both an admission register and attendance register as required by law. All pupils are placed on both registers. Twin Oaks Primary School informs and seeks guidance from the Local Authority before any child is deleted from the admission register. No child is deleted unless there are appropriate checks conducted to ensure that the child is not at risk from being missing from education. A child may be deleted from the admission register for the following reasons.

- The child has been taken out of school by their parents and is being educated outside the school system e.g. home education;
- The child ceased to attend the school and no longer lives within reasonable distance from the school at which they are registered;
- The child has been certified by the education medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Are in custody for a period of more than four months due to a final court order and the Headteacher does not reasonably believe that they will be returning to the school at the end of that period; or,
- Have been permanently excluded. The Local Authority must be notified when the school is to delete a pupil form its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty so that Local Authorities can, as part of their duty to identify 8 regulation 4 of the Education (Pupil Registration) (England) Regulations 2006 9 Regulation 12(3) of the Education (Pupil registration) (England) Regulations 2006 14 children of compulsory school age who are missing education , follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Twin Oaks Primary School informs the Local Authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days.

6.11 Children with Special Educational Needs and Disabilities

For a variety of reasons, children with additional needs face an increased risk of abuse and neglect, therefore adults are expected to take extra care to interpret correctly apparent signs of abuse or neglect. Indications of abuse will be reported as for other pupils.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- Difficulties may arise in overcoming communication barriers

At Twin Oaks Primary School, we identify pupils who might need more support to be kept safe or to keep themselves safe. We need therefore to be especially vigilant when caring for these children and be alert to the most minor of changes. Staff will consider the pupils' age, stage and level of understanding at all times. Building relationships with our families are key. We ensure that all pupils will have access to bespoke support from our Learning Mentor when required to overcome difficulties with communication and be heard.

6.12 Young Carers

The school recognises that young carers are children and young people who take on caring responsibilities for a family member who may have a physical or mental health condition, disability, substance misuse issue, or other support need. Young carers may face additional barriers to their safety, wellbeing and education, including tiredness, missed learning, difficulties with attendance, social isolation, emotional pressures, and reluctance to disclose challenges at home due to concerns about what may happen to their family.

Staff will remain alert to signs that a child may have caring responsibilities and understand that young carers may not always identify themselves or ask for support. The school will provide a safe and supportive environment where children feel able to share their experiences and access appropriate help.

Where a child is identified as a young carer, staff will discuss their needs with the Designated Safeguarding Lead (DSL) and consider what support may be appropriate. This may include pastoral support, signposting to community-based early help, referral for a Family Help (Targeted Early Help) assessment, or working with relevant partner agencies to ensure the child and family receive appropriate support.

The school will work collaboratively with children, parents/carers and partner agencies to ensure that young carers are supported to achieve their full potential and that their caring responsibilities do not negatively impact on their safety, wellbeing, attendance, education or development.

Where there are concerns that a young carer's circumstances indicate they may be at risk of harm or that their needs are not being met, the DSL will follow Lewisham's Multi-Agency Threshold Guidance and take appropriate safeguarding action.

6.13 Children with Medical Conditions

Children with a medical condition may be more vulnerable to abuse, neglect, and other safeguarding risks, including missed education due to ill health, and staff

should ensure that any concerns are considered alongside, rather than dismissed because of, a child's medical condition. Our Supporting Pupils with Medical Conditions policy sets out our arrangements in more detail.

6.14 Fabricated 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.
FII is also known as 'Munchausen's syndrome by proxy' (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness.

Behaviours in FII include a parent or other carer who:

- persuades healthcare professionals that their child is ill when they're perfectly healthy
- exaggerates or lies about their child's symptoms
- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes
- deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary medication or other substances

If you suspect that a parent/carer may be fabricating or inducing illness in their child, you should not confront them directly. It's unlikely to make the person admit to wrongdoing, and it may give them the opportunity to dispose of any evidence of abuse. You must immediately report any concerns to the DSL using the concerns form.

6.15 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Please refer to the Private Fostering Policy for more details).

A close family relative is defined as a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

A referral should be made to Children's Social Care in writing using Lewisham's referral form. The referral should have as much information as possible, including full details of all children concerned and their parents/carers/those with PR and any information about how these children came to be in their current situation. In some cases, you may not have been provided with all the details so it is important that you discuss the referral with the carers to obtain them. However, if the information is not forthcoming, the referral should not be delayed. Referrals should be made online at: www.lewisham.gov.uk/MASH.

Once notified about a private fostering arrangement, the local authority is required to assess the home to ensure that is suitable. If it is happy with the arrangements, then it is required to arrange a visit once every six weeks for the first year and then at three-monthly intervals whilst the placement continues. Children's Social Care will be appointing a dedicated worker to work with private fostered children. Details will be provided as soon as possible. This worker will be available to offer advice and assistance if required.

6.16 Parents, Parental Responsibility and Separation

For the purposes of education law, the definition of a parent is wider than in everyday use. Under the Education Act 1996, a parent includes:

- all natural parents, whether married or not;
- any person who has parental responsibility for a child, such as a legally appointed guardian or a person named by the court or Local Authority; and
- any person who has care of a child, meaning a person with whom the child lives and who looks after the child, regardless of their relationship to the child.
- Parental Responsibility

Parental responsibility is defined in the Children Act 1989 as having all the rights, duties, powers, responsibilities and authority which, by law, a parent has in relation to a child and their property.

People other than a child's birth parents can acquire parental responsibility through, for example:

- being granted a Child Arrangements Order (previously a Residence Order);
- being appointed as a guardian;
- being named in an Emergency Protection Order (with responsibilities limited to safeguarding and promoting the child's welfare); or
- adopting a child.

Where parents are not married at the time of a child's birth, the mother automatically has parental responsibility. A father may acquire parental responsibility through legal means, including being named on the child's birth certificate (where the birth was jointly registered after the relevant legislative changes), through a parental responsibility agreement, or by a court order.

Separated Parents and Parental Conflict

The school recognises that separation and parental conflict can be extremely difficult for children and families. The school's priority in all circumstances is the safety, wellbeing and best interests of the child.

The school will work in partnership with parents and carers who have parental responsibility and will provide information and support to all parties in accordance with their legal rights and responsibilities. However, the school will remain neutral and impartial in disputes between parents or carers and will not become involved in parental disagreements, arguments, grievances or conflicts.

The school is not a mediator, legal advisor or decision-maker in family disputes and will not be expected to:

- take sides in disagreements between parents or carers;
- determine who is right or wrong in relation to parental conflict;
- pass messages between parents or act as a communication channel for disputes;
- become involved in disagreements regarding arrangements that are matters for parents or the family courts; or
- restrict a parent's involvement unless there is a legal reason or safeguarding concern requiring this.

The school will not make decisions based solely on the wishes or preferences of one parent where both parents have parental responsibility. In the absence of a court order or other legal restriction, the school will continue to treat all parents with parental responsibility equally and will provide information, communications and access to school-related matters accordingly.

Where parents are unable to agree arrangements relating to their child, these matters should be resolved between parents, through appropriate mediation services, legal advice or the family court. The school will comply with any court orders or legal directions provided to it.

Safeguarding and Child-Centred Practice

While remaining neutral in parental disputes, the school will always act to safeguard and promote the welfare of the child. Where parental conflict is having a negative impact on a child's emotional wellbeing, attendance, education, safety or development, the school will consider whether additional support or safeguarding action is required.

Any concerns about domestic abuse, coercive control, emotional harm, neglect or any other safeguarding issue will be considered separately from parental disputes

and managed in accordance with the school's safeguarding procedures and Lewisham's Multi-Agency Threshold Guidance.

The school will always approach situations involving separated parents from a child-centred perspective, ensuring that decisions are based on what is in the child's best interests rather than the views, disagreements or conflicts of adults.

Please see Separated Parents Policy

6.17 Photography and Images

To protect children, we will:

- Seek parental consent for photographs to be taken or published (for example on our website or in newspapers and/or publications)
- Only use the school's equipment
- Only take photos and videos of children to celebrate achievement
- Use only the child's first name with an image
- Ensure that the children are appropriately dressed
  Encourage children to tell us if they are worried about any photographs that are taken of them

Parents that are taking photographs at school assemblies and other productions or school trips are instructed that these are to be for personal use only and are not to be shared on social media.

6.19 Commissioned Extended School Provision and Lettings

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any other services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. **(Chapter 2 - Working Together 2023)**

In relation to extended school provision and lettings, these include:-

- A clear line of accountability for the commissioning and /or provision of services designed to safeguard and promote the welfare of children
- A designated professional lead for safeguarding
- Safe recruitment practices for individuals whom the organisation will permit to work regularly with children
- Clear policies, in line with those from the LSCP for dealing with allegations against people who work with children
- Allegations relating to an incident when an individual or organisation was using school premises for the purposes of running activities for children, schools should follow their safeguarding policies and procedures, including informing the LADO.

'Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.' Working Together 2018. Where any extended service is directly commissioned by Lewisham Council, they will be responsible for the safeguarding.

Where extended school provision is offered directly under the supervision or management of school staff, for example an after-school sports club led by a member of school staff, the school's safeguarding arrangements will apply.

Where services or activities are provided separately by another body, the Governing Body should seek assurance that the body concerned has **appropriate policies and procedures in place** regarding safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate

Schools and colleges should have arrangements in place with extended school providers and contractors to make sure that anyone who will be coming onto school site and working with children has been subject to the appropriate level of DBS check and safer recruitment processes.

6.19 Drop-off and Collection Procedures

The school has procedures in place to ensure that all pupils are safely collected at the end of the school day and remain in the care of a parent, carer or authorised adult. Parents/carers must provide the school with accurate and up-to-date contact details, including details of additional authorised adults (for example, grandparents or other trusted adults) who may collect their child in an emergency.

It is the responsibility of parents/carers to ensure that these arrangements are reviewed regularly and that they have made appropriate arrangements for the collection of their child, including identifying alternative authorised adults who can collect their child if they are unexpectedly delayed.

Parents/carers should make every effort to ensure their child is collected on time and should inform the school as soon as possible if an unavoidable delay occurs. Late collection should be a rare occurrence, and parents/carers remain responsible for ensuring suitable arrangements are in place.

Where a child has not been collected at the expected time, the school will follow its Drop-off and Collection Procedures. The school will attempt to contact the parent/carer and any authorised emergency contacts provided by the family.

If the school is unable to contact the parent/carer or any named emergency contact, and the child remains uncollected after a reasonable period, particularly where the school day has ended and staff are no longer able to safely supervise the child, the school will consider the situation as a safeguarding concern. In line with safeguarding procedures, the school may contact Children's Social Care for advice and support to ensure appropriate arrangements are made for the child's safety and welfare.

The school will not allow a child to leave with an adult who has not been authorised by the parent/carer unless this has been agreed in advance or there are exceptional circumstances where safeguarding considerations require further action.

6.20 Mental Health/Self-Harm

Mental health problems can affect children and young people and may include conditions such as depression, anxiety, eating disorders, emotional difficulties, and conduct disorders. They can sometimes develop in response to experiences in a child's life, including trauma, abuse, neglect, exploitation, bullying, or other adverse childhood experiences. In some cases, mental health difficulties may be an indicator that a child has suffered, or is at risk of suffering, harm and should be treated as a potential safeguarding concern.

At Twin Oaks Primary School all staff will receive regular training as part of our safeguarding and child protection training to help them recognise and respond appropriately to mental health concerns, including self-harm, suicidal thoughts (suicidal ideation), and the risk of suicide. Staff will be supported to understand that changes in a child's emotional wellbeing or behaviour may require safeguarding action.

Staff are well placed to recognise potential warning signs that a child may be experiencing mental health difficulties or may be at risk of self-harm or suicide. These may include significant changes in behaviour, mood or relationships; withdrawal from friends, family or usual activities; changes in attendance or performance; difficulty sleeping; increased anxiety or distress; expressing hopelessness or feeling like a burden; giving away possessions; talking about death or wanting to harm themselves; and physical signs of self-harm such as unexplained injuries or changes in clothing to hide injuries. Any concerns should always be taken seriously and shared promptly with the DSL.

Where children have experienced abuse, neglect, exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact on their mental health and wellbeing. School staff will work to provide appropriate support, identify concerns early, and ensure children receive timely help.

Where the school provides or signposts mental health support or interventions, these will be considered carefully to ensure they are safe, effective, appropriate, and responsive to the individual needs of the child. Support will be provided by appropriately trained staff or professionals, and referrals will be made where specialist support is required.

If a member of staff believes a child is at immediate risk of harm, including risk of serious self-harm or suicide, they must act immediately by following the school's safeguarding procedures, informing the DSL (or deputy DSL), and contacting emergency services where necessary. Safeguarding concerns must never be delayed due to confidentiality concerns or uncertainty.

6.21 Faith Based Abuse

Faith abuse is abuse of a child, linked to faith or belief. It is not about challenging people's beliefs, but where these beliefs lead to abuse, this should never be tolerated. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the

killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

In Twin Oaks Primary School , we have provided all staff, as part of our safeguarding training, information about potential signs and indicators of faith-based abuse.

In working to identify such child abuse, it is important to remember every child is different. Some children may display a combination of indicators of abuse whilst others will attempt to conceal them. In addition to the factors above, there are a range of common features across identified cases. These indicators of abuse, which may also be common features in other kinds of abuse, include:

- a child's body showing signs or marks, such as bruises or burns, from physical abuse;
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children;
- a child's personal care deteriorating, for example through a loss of weight, being hungry, turning up to school without food or lunch money, or being unkempt with dirty clothes and even faeces smeared on to them;
- it may be directly evident that the child's parent or carer does not show concern for or have a close bond with the child;
- a child's attendance at school becoming irregular or the child being taken out of school altogether without another school place having been organised, or a deterioration in a child's performance at school;
- a child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'.

All staff should be alert to the indicators above and should be able to identify children at risk of this type of abuse and intervene to prevent it.

Following the potential identification, confirmation or disclosure of faith abuse by a child/young person/family member to an adult in school, the following actions will be considered:

- Standard child safeguarding procedures apply and must always be followed in all cases where abuse or neglect is suspected including those that may be related to belief systems
- A FFCP referral may be necessary to safeguard the child/young person (see below for contact details)
- An Early Help Assessment may be appropriate for some children and young people to meet need

6.22 Exclusions

Decisions to exclude a child are not taken lightly and the final decision will always be made by the Headteacher. In line with the recent DfE statutory guidance, 'Exclusion from maintained schools, academies and pupil referral units in England', September 2017, when the school is considering excluding, either fixed term or permanently, a vulnerable pupil and / or a pupil/student who is the subject of a child protection plan

or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Governing Body.

6.23 Searching Screening and Confiscation

The DfE advisory guidance, Searching, screening and confiscation guidance for Headteachers, school staff and governing bodies' sets out the power schools have when searching pupils, both with or without consent, and their right to confiscate items found during the searches.

The United Nations Convention on the Rights of the Child (UNCRC) embodies the idea that every child should be recognised, respected and protected as a rights holder and as a unique and valuable human being. It applies to all persons under the age of 18. At Twin Oaks Primary School we will ensure that we give due diligence to Article 3 and 16 as outlined below when we conduct any such searches.

Article 3 (best interests of the child)

The best interests of the child must be a top priority in all decisions and actions that affect children.

Article 16 (right to privacy)

Every child has the right to privacy. The law should protect the child's private, family and home life, including protecting children from unlawful attacks that harm their reputation.

We will attempt to contact the parent/carer immediately to advise them of the situation and if practical and safe to do so, may wait until the parent/carer can be present. If this is not possible or the search needs to be undertaken more speedily, the Head teacher may authorize a member of security staff to conduct a search, when there is credible and reliable evidence to suggest that a child or young person is in possession of a prohibited item by the school or an item which may be intended to cause serious harm to an individual including themselves.

Contact will be made to the parent/carer immediately if this is the case. A search will only involve the removal of outer clothing and searching pockets. If a more intimate search is required, this can only be carried out by the police under specific instructions of the Borough Command Unit (BCU) Inspector. In this instance, the parent/carer will be advised immediately and the search will only go ahead when the parent/carer or appropriate member of school staff, in loco parentis is present.

Colleagues must ensure that they have confirmed instructions from the BCU Inspector to permit such a search being carried out.

At Twin Oaks Primary school we will at all times consider our duty to advocate for the child and pay due diligence to promoting anti-racist practice and be aware of the potential of adultification in these cases. We will also make the appropriate referrals to FFCP following any such requirement.

At Twin Oaks Primary School there are times that we routinely screen students for safeguarding reasons while on other occasions it may be necessary to conduct searches more randomly. Any such searches/screening will always be done in accordance with advisory guidance and full details of our school's approach are detailed in our Behaviour Policy.

6.24 Serious Youth Violence and Knife Crime

At Twin Oaks Primary School we recognise that serious violence is a significant safeguarding concern. Serious violence may include physical assault, the carrying, threatening with, or use of weapons, and may occur in the context of peer conflict, bullying, gang-related activity, or criminal exploitation.

All staff must remain alert to signs that a child may be at risk of, involved in, or affected by serious violence. This includes children who may be vulnerable to exploitation, those who are being harmed by others, and those involved in causing harm, who may also be victims themselves.

Any concerns that a child is carrying a weapon, has access to a weapon, has threatened to use a weapon, or is at risk of involvement in serious violence must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. The DSL will assess the level of risk to the child, other pupils, staff, and the wider school community, considering all available information and any wider safeguarding concerns.

Where appropriate, the school will put in place a safety and support plan, which may include actions to reduce risk, support the child's wellbeing, manage peer conflict, and prevent further harm. The school will work with relevant partners, including external agencies and the police where necessary, to ensure children receive appropriate protection and support.

Staff should be particularly aware that the risk of involvement in serious violence may increase for some children, including those experiencing disrupted education, such as repeated suspensions, permanent exclusion, or periods in alternative provision, as well as children with previous involvement in offending or exploitation. Staff should also consider that risks may increase at particular times or locations, including before or after the school day and outside of the school environment.

Early identification and support are essential. Where concerns are identified, the school will seek to provide appropriate help, which may include access to trusted adults, mentoring, emotional wellbeing support, social skills development, targeted interventions, and referrals to specialist services where required.

For further guidance on recognising indicators of serious violence, assessing risk, making referrals, and when to involve the police, staff should speak to the DSL and refer to the school's safeguarding procedures.

6.25 Contextual Safeguarding

Twin Oaks Primary School is aware that the young people in our school may face additional extra-familial risks outside of the school context. Working Together to Safeguard Children, 2018 states that, "These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including:

- exploitation by criminal gangs and organised crime groups such as county lines;
- trafficking;

- online abuse;
- teenage relationship abuse;
- sexual exploitation and
- the influences of extremism leading to radicalisation,".

As part our whole-school approach to these contextual safeguarding risks, we have developed a curriculum, policy and practice that promotes a culture that focuses on educating about risks and potential threats as well as responding to these. In addition to this, Twin Oaks Primary School will regularly use student-led intelligence to identify potential risks in and outside of our community and mitigate against them through regular safety mapping exercises.

Where safety mapping exercises identify people, places and environments where extra-familial harm could take place, we will focus on interventions that address these wider environmental factors by partnering with other professionals, external agencies and community establishments to create more safe spaces for our young people.

We will train colleagues to understand how to identify these potential contextual safeguarding risks/threats and refer any new concerns in the normal way.

Schools have been identified as sites in which young people can experience and/or be safeguarded from abuse and violence. From experiences of sexual harassment and sexual violence through to physical assaults, relationship-based abuse, bullying and grooming into exploitative networks, young people have told practitioners, researchers and journalists about risks they have faced in educational settings.

As such it is critical that when young people experience abuse and violence and this is in some way associated to their school environment or school relationships – that the school itself features within the process of assessment and intervention. If we want to address the factors that cause abuse, or provide an opportunity for abuse to occur, then these factors needs to be identified explored and addressed – and school assessments is one way to achieve this.

School assessments uncover risks and strengths within school contexts, that are associated to young people's experiences of abuse.

A school assessment draws on aspects of the environment to build a picture of how the school can be safer for young people. A range of methods will be used to gather this information including:

- Speaking to young people
- Student and parent surveys
- Speaking with staff
- Reviewing behaviour logs
- Observing the school environment

At Twin Oaks Primary School we take contextual safeguarding very seriously. If colleagues have concerns or become aware of circumstances within school where young people are currently experiencing or are at risk of harm, please report to the DSL using the concerns form. A decision will then be made by the Senior Leadership Team about the potential need to carry out a school assessment.

6.26 Alternative Provision

When our school places a pupil in an alternative provision, we maintain responsibility for the safeguarding of that pupil. We will ensure that the placement meets the pupil's needs and that their safety and well-being are prioritised.

Given that pupils placed in Alternative Provision (AP) often have complex needs and may be at increased risk of harm, Twin Oaks Primary School] recognises the importance of robust safeguarding oversight in these settings. The school will obtain written confirmation from all alternative providers that appropriate safeguarding checks have been completed for all individuals working with pupils equivalent to those that schools would undertake for their own staff.

This includes a commitment from the provider to inform the school of any changes that could pose a risk to pupils, such as new staff appointments, so the school can be assured appropriate vetting has occurred. The school will also maintain accurate records of each child's placement, including the address of the AP or subcontracted provision being accessed.

To ensure ongoing safety and suitability, placements will be reviewed at least half-termly, with checks on attendance, safeguarding practices, and the child's overall wellbeing. Where safeguarding concerns arise, the placement will be immediately reviewed and terminated, if necessary, unless or until those concerns are satisfactorily resolved.

6.27 Children and the Court System

Children may sometimes be required to provide evidence in criminal courts, whether as victims of crimes or as witnesses. At Twin Oaks Primary school we recognise the significant impact this can have on a child's emotional and psychological well-being, our school is committed to supporting children throughout this challenging process.

To assist children in understanding the court system, there are two specific guides available:

For children aged 5-11 years. This guide explains the court process in simple terms, including the special measures available to support young children.

For children aged 12-17 years. This guide offers a more detailed explanation of the court process, appropriate for older children.

Both guides include diagrams illustrating the courtroom structure and explain the use of video links to help children understand what to expect.

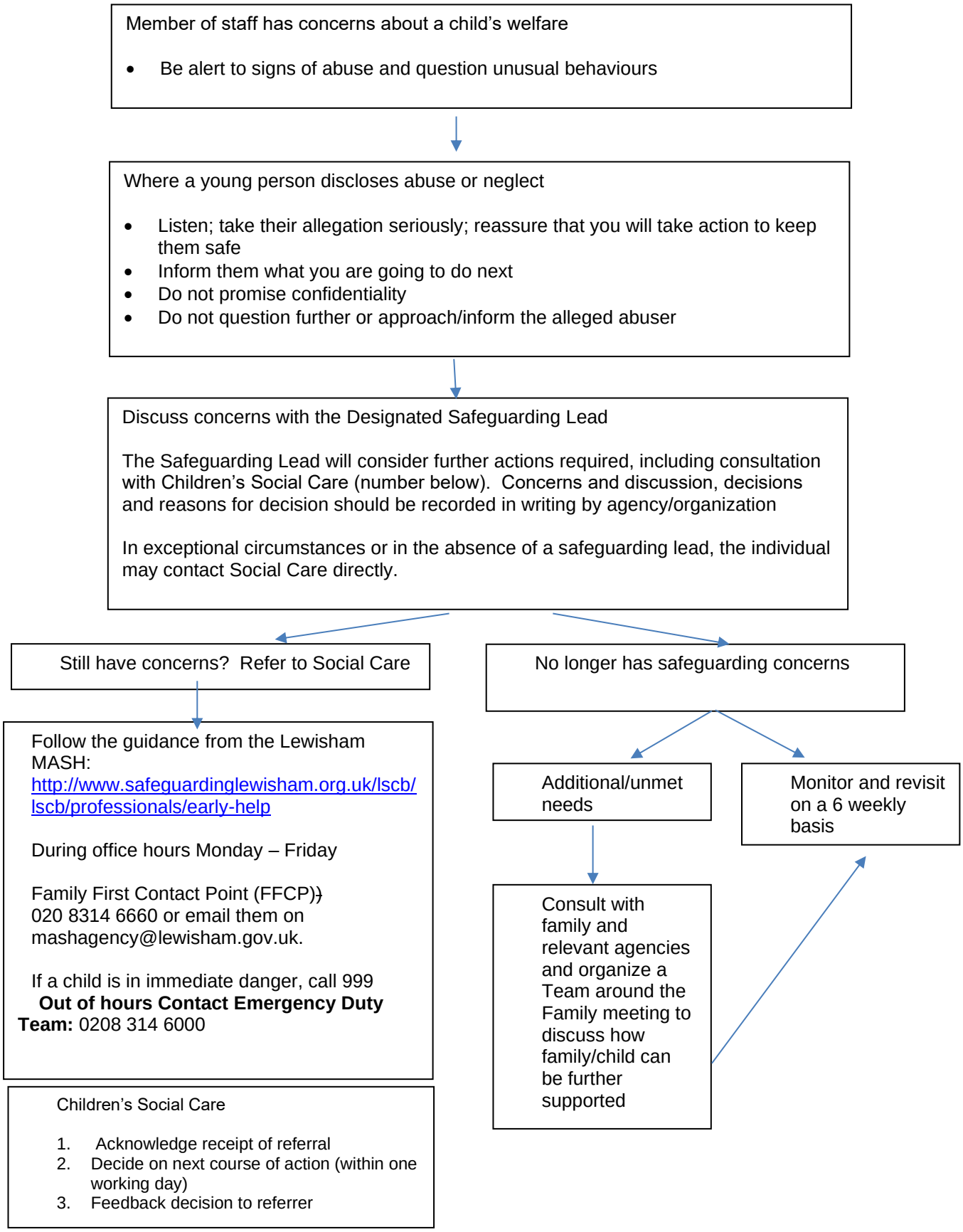
When children are required to give evidence, our school will:

1. Provide Emotional Support: Offer counseling services and emotional support through our school's support staff.

2. Educational Support: Ensure that children understand the court process by discussing the age-appropriate guides in a safe and supportive environment.

3. Coordination with Families: Work closely with families to understand the child's needs and coordinate support strategies.

Appendix 1 What to do if you're worried a child is being abused or neglected



This flowchart is intended for use as a brief guide. Please refer to the DfE Guidance 'What to do if you're worried a child is being abused, which includes definitions and possible indicators of abuse.