ASHLEY COLLEGE

SAFEGUARDING AND CHILD PROTECTION POLICY

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1. Important Contacts

Title	Contact details
Designated Safeguarding Lead **Lead teacher for Looked after Children** **Senior Mental Health Lead**. Louise Togher – Deputy Headteacher/SENCo 	ltogher@ashleycollege.brent.sch.uk 020 8937 3336 07735 826382
Deputy Designated Safeguarding Lead Ranjna Shiyani –Headteacher 	rshiyani@ashleycollege.brent.sch.uk 02089373330
Deputy Designated Safeguarding Lead Anne-Marie Mika – Deputy Headteacher 	amika@ashleycollege.brent.sch.uk 02089373330
Designated Management Committee Member responsible for Child Protection Denyse Mitchell 	020 8937 3330
Brent Family Front Door	020 8937 4300
Brent LADO	Brent.LADO@brent.gov.uk
Police	101 or for emergency: 999
FGM - Mandatory reporting	Police on 101
NSPCC	0800 800 5000
Report Abuse in Education NSPCC Helpline	0800 136 663
Childline	0800 1111
Government's Whistle-blowing Service	0800 028 0285
Forced Marriage Unit	Tel: 020 7008 0151 From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm) Out of hours: 020 7008 1500 (ask for Global Response Centre)
Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)	Tel: 020 7340 7264 Email: counterextremism@education.gsi.gov.uk
Disclosure and Barring Service	Tel: 03000 200 190 Email: customerservices@dbs.gov.uk
Teaching Regulation Authority	Tel: 020 7593 5392 Email: misconduct.teacher@education.gov.uk

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of hours the DSL can be contacted by email safeguarding@ashleycollege.brent.sch.uk.

When the DSL is absent, the Deputy DSLs Ranjna Shiyani rshiyani@ashleycollege.brent.sch.uk & Anne-Marie Mika amika@ashleycollege.brent.sch.uk will act as cover.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education and Working Together to Safeguard Children , and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025 (collectively referred to as 'data protection legislation')

3. Links to other policies

This policy should be read in conjunction with the following policies and procedure

- Anti-Bullying
- Behaviour
- Digital Safety Social Media and Acceptable Use of Property
- Educational Visits
- Equality Implementation
- E-Safety
- Health & Safety
- Home Tuition Guidance
- Recruitment and Employment including DBS Policy & Procedures for Schools
- Remote Learning

- SEND Policy
- Staff Behaviour Policy and Code of Conduct
- Supporting Students with Medical Conditions - *Staff should be aware that children with medical conditions may face additional safeguarding challenges. Further information about supporting children with medical needs can be found in our Supporting Pupils with Medical Conditions Policy.*
- Whistleblowing

4. Aims

Ashley College is committed to the vital contribution all staff and management committee make to safeguarding children. Only children who are Brent residents are able to access our provision and therefore we work closely with the Brent Safeguarding Partnership.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We promote a culture of vigilance, and are alert to the signs of abuse and neglect. We follow our procedures to ensure that children receive effective support, protection and justice. The procedures contained in this policy apply to all staff and governors and are consistent with those of the Brent Safeguarding Partnership.

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues.

Ashley College is committed to achieving these aims by:

- Ensure that all staff and volunteers are recruited using robust 'Safer Recruitment' processes
- Ensuring that all staff are clear and aware of referral procedures within the school (Child Protection is everyone's responsibility and any member of staff can, if necessary, make a referral to social care via the local authority website)
- A continuous package of training which helps all staff to develop an awareness of the need for Child Protection and the responsibility which they have in identifying abuse, especially with regards to children whose characteristics mean they are at increased risk of abuse
- Ensuring that all staff are aware that both mental and physical health are relevant to the safeguarding and welfare of children
- Ensuring that outside agencies are involved where appropriate
- Ensuring that key concepts of Safeguarding (including child on child abuse and online safety) are integrated within the curriculum especially via Relationships, Sex and Health Education and PSHCE
- Creating an environment where children feel secure, have their viewpoints valued, are encouraged to talk and are listened to
- Creating an environment where everyone assumes that sexual harassment. abuse (including online abuse) are happening in school (even where there are no specific reports). We adopt the mantra of "it can happen here".

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the child
- failing to re-assess concerns when situations do not improve
- not sharing information or sharing information too slowly
- a lack of challenge to those who appear not to be taking action

Keeping Children Safe in Education 2025 emphasises that a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil. The school should

be satisfied that the placement meets the pupil's needs. Pupils placed at Ashley College will be safeguarded by their mainstream schools and Ashley College.

5. Equality Statement

Ashley College staff and management committee recognise that some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs and/or disabilities (SEND) or health conditions
- have specific medical conditions that may affect their vulnerability or ability to keep themselves safe
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are missing or absent from education for prolonged periods and/or repeat occasions
- whose family has expressed an intention to remove them from school to be home educated.

Single-Sex Sports and Activities:

Ashley College recognises that we can legally separate children into sports and PE activities based on biological sex for reasons of safety and fairness, without violating non-discrimination laws under the Equality Act 2010. When making decisions about participation in single-sex sports or activities, we will: consider the safety and fairness of all pupils, follow relevant sporting body guidance, communicate clearly with pupils and families about the reasons for any decisions. We will ensure that all pupils have access to appropriate PE and sporting opportunities

6. Definitions

Domestic abuse

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines

neglect in more detail.

Making or sharing of nudes and semi-nudes refers to children creating, possessing, or sharing nude or semi-nude images, videos or live streams. This includes images that are digitally altered or wholly generated by artificial intelligence (e.g., deepfakes). All such incidents mandate a safeguarding response, regardless of whether the sharing was consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

7. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, and management committee members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. Our policy and procedures also apply to Crystal House and our home tuition service.

7.1 All staff

All staff will:

- All staff members (including those not working directly with children) must read Part 1 of Keeping Children Safe in Education 2026 in its entirety during their induction and annually thereafter. The condensed summary previously contained in Annex A of KCSIE has been removed. All staff, regardless of role, must read the full Part 1 without exception. Staff will be required to sign to confirm they have read and understood this guidance.
- Reinforce the importance of online safety when communicating with families. This includes making families aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

All staff will be aware of:

- Ashley College systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection.

7.2 The Designated Safeguarding Lead (DSL)

Our DSL is Louise Togher and she is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- See appendix 1 for thresholds which DSL has clear understanding of

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- Keep the Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and Deputy DSL are set out in their job description.

7.3 Role of the Management committee and the Nominated Member for Child Protection

The management committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- A link management committee to monitor the effectiveness of this policy in conjunction with the full management committee. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate.

All governors will read Keeping Children Safe in Education in its entirety.

7.4 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to families when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

7.5 Virtual school heads

- Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker
- They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

7.6 Third-Party Providers and Contractors

Ashley College shares active safeguarding duties with all third-party providers, including supply teachers, trainee teachers, and contracted staff. This is explicitly stated in KCSIE 2026.

We will:
• Ensure that all third-party providers understand and comply with our safeguarding policies and procedures
• Verify that appropriate safeguarding checks have been completed for all supply staff, trainee teachers, and contractors who will have contact with pupils
• Provide third-party staff with our Code of Conduct and behaviour expectations
• Monitor the conduct of third-party staff and address any safeguarding concerns immediately
• Maintain clear communication channels with agencies and providers regarding safeguarding responsibilities

All third-party staff will be required to read Part 1 of Keeping Children Safe in Education 2026 and confirm their understanding of our safeguarding procedures before beginning work at Ashley College.

8 Training

8.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but formally at least once a term.

Volunteers will receive appropriate training, if applicable.

8.2 The DSL and deputies

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

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

8.3 Management Committee

All management committee members receive training about safeguarding and child protection, including online safety at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the Chair of the management committee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

8.4 Recruitment – interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

9. Confidentiality and record keeping

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information. Information must never be used to intimidate, humiliate, or embarrass the pupil.

Confidential information about a child or young person should never be used casually in conversation (e.g., in the corridor during break or lunchtime) or shared with any person other than on a need-to-know basis.

There are some circumstances in which a member of staff may be expected to share information about a child, for example when there is a safeguarding concern. In such cases, individuals have a duty to pass information on without delay, but only to the Designated Safeguarding Leads.

Confidential information should not be displayed where others can see it. Gossip spreading within school is not acceptable and, if necessary, situations will be clarified publicly by a senior member of staff.

Using CPOMS for Safeguarding Records

Ashley College uses CPOMS (Child Protection Online Management System) as our central system for recording, monitoring and managing all safeguarding concerns and child protection information. CPOMS provides us with a secure, comprehensive and holistic overview of each child's safeguarding journey.

What we record on CPOMS:
• All safeguarding concerns, disclosures and incidents
• Child protection referrals and outcomes
• Records of conversations with pupils, families and external agencies
• Attendance at multi-agency meetings (e.g., child protection conferences, core groups, TAF meetings)
• All child protection plans and reviews
• Early Help Assessments and support plans
• Serious incidents including self-harm (see Appendix 4)
• Filtering and monitoring alerts that raise safeguarding concerns
• Any communication or action taken in response to a safeguarding concern

Why CPOMS is important:

CPOMS enables us to maintain a complete chronological record of all safeguarding activity for each child. This is crucial because:

• Pattern recognition - CPOMS allows us to identify patterns, trends and escalating concerns that might not be apparent from individual incidents. We can see the full picture of a child's experiences over time, which helps us intervene early and effectively
• Holistic view - All staff who work with a child can see (with appropriate permissions) the relevant safeguarding information, ensuring a consistent and informed approach to supporting the child
• Information sharing - CPOMS facilitates secure and efficient information sharing between staff, external agencies and (where appropriate) mainstream schools for dual-registered pupils
• Accountability and audit trail - Every entry is time-stamped and attributed to a specific staff member, creating a clear audit trail of who knew what and when, and what actions were taken
• Multi-agency working - CPOMS records provide comprehensive evidence for multi-agency meetings and help us demonstrate the support we have provided to children and families
• Safeguarding oversight - The DSL and senior team can monitor all safeguarding activity across the school, ensuring no concern is missed and appropriate action is taken
• Transition and continuity - When a child moves to another school, we can provide a complete safeguarding record, ensuring continuity of support and protection

How we use CPOMS:

All staff have been trained to use CPOMS and understand their responsibility to record safeguarding concerns promptly and accurately. Staff must:

• Record any safeguarding concern on CPOMS on the same day it arises, or as soon as practically possible
• Provide a clear, precise, factual account of observations or what has been said
• Avoid opinions or judgements - stick to the facts • Use the child's own words where possible (especially in cases of disclosure)
• Alert the DSL immediately for urgent concerns (in addition to recording on CPOMS)

The DSL and Deputy DSLs monitor CPOMS daily and respond to all entries. They will:

• Review all new entries and take appropriate action
• Link related incidents to build a comprehensive picture
• Identify patterns or escalating concerns • Ensure appropriate follow-up actions are completed and recorded
• Share information with relevant staff on a need-to-know basis
• Maintain oversight of all open safeguarding cases

Confidentiality and access:

CPOMS is a secure system with role-based access controls. Staff can only access information that is relevant to their role and necessary for them to know. All users must:

• Keep their login credentials secure and never share them
• Only access information they need to know to support a child
• Understand that all activity on CPOMS is logged and monitored
• Follow our data protection procedures when using CPOMS

Data protection:

All information recorded on CPOMS is processed in accordance with data protection legislation (the Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025). CPOMS data is stored securely and retained in line with our data retention policy and statutory requirements.

It is essential that accurate written records are kept where there are concerns about the welfare of a child. These records are kept in secure, confidential files via CPOMS, which are separate from the child's school records. The preferred practice is for families to be informed of and agree to any referral being made (except when informing the families may increase the risk of or actual harm to a child). Records also show how concerns were followed up and resolved (i.e., actions taken and decisions reached). This also helps if/when responding to any complaints about the way a case has been handled by the school.

All written information regarding child protection referrals (both active and obsolete) is kept by the Designated Safeguarding Lead, Louise Togher. All safeguarding information is kept in the pupil's safeguarding folder on CPOMS. All child protection plans, Early Help Assessments, risk assessments and multi-agency meeting records are uploaded to each individual child's CPOMS file.

To co-ordinate the provision of child protection records they will be transferred to a child's new school or college as soon as possible, and at least:

• Within 5 days for an in-year transfer
• Within the first 5 days of the start of a new term

to allow the new school or college to have support in place for when the child arrives.

9.1 Dual registration

The vast majority of our students are dual registered.

KCSIE is clear:

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

The mainstream school still retains responsibility for the safeguarding of students on dual roll and we will work together with our mainstream partners to ensure that all information about the child is shared:

• At the initial meeting when a pupil joins our roll

• Any important plans or paperwork that the mainstream school deems important for us to have should be either securely sent via egress and saved on our CPOMS system or dropped by a member of staff to Ashley College

• Attendance data is shared weekly

• Any safeguarding or behavioural issues that arise will be shared with the DSL of the mainstream school within 24 hours and recorded on CPOMS

When a child is removed from our roll and back to single roll we will transfer all safeguarding files (exported from CPOMS) to them within 5 days.

10. Recognising abuse and specific safeguarding issues

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called ‘honour’-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

10.1 Four categories of 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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

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 health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence

CSE includes 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, it can occur over time or be a one-off occurrence.

Sexual exploitation involves varying degrees of coercion, intimidation, force or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or may not realise they are victims of sexual exploitation.

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

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

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

Whilst age may be, the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of

the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Indicators of CSE and CCE include children having unexplained gifts, money or new possessions, a change in peer groups, changes in emotional wellbeing and misuse of drugs and alcohol.

Any concerns of CSE or CCE must be passed on to our DSL, Louise Togher immediately.

10.3 Children missing in education or persistently absent

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with families when pupils are not at school. This means we need to have at least three up to date contacts numbers for families.

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school

- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who are absent 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 going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger. Please see our attendance policy for more detail.

10.4 Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by families or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. There may also be community safety incidents within the vicinity of the school which can raise concerns amongst children and families. Opportunities for pupils to develop their confidence and abilities around keeping themselves are embedded into the school curriculum.

10.5 Children and the court system

Guidance is available for when children are required to give evidence in criminal courts 5-11 year olds and 12-17 year olds. Making arrangements for children via the family courts following separation can be stressful and entrench conflict in families. The Ministry of Justice has launched useful online guidance Get help with child arrangements (also known as contact, access or custody).

10.6 Children with a family member in prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information to support professionals working with offenders and their children, to help mitigate negative consequence for those children.

10.7 Cybercrime

Cybercrime is a criminal activity committed using computers and/or the internet. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime. If there are concerns about a pupil in this area then the DSL will consider referring them to the Cyber Choices programme.

10.8 Domestic Violence

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. Domestic abuse continues to be a prevalent risk factor identified through children social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact, the abuse has on others such as the non-abusive parent. This including where they see, hear or experience its effects.

Child-to-Parent or Caregiver Abuse

Ashley College recognises that child-to-parent or caregiver abuse is a form of domestic abuse where a child or young person uses controlling, coercive or harmful behaviour towards a parent or caregiver.

This can include:
• Physical violence
• Emotional or psychological abuse
• Financial abuse
• Damage to property
• Threats and intimidation

Child-to-parent abuse can have serious impacts on family functioning and the wellbeing of all family members. It may also indicate that the child themselves is experiencing abuse or has additional needs requiring support.

Staff should be aware that:
• Families may be reluctant to disclose child-to-parent abuse due to shame or fear of judgment
• The child may have experienced trauma or abuse themselves
• Early intervention and support can help prevent escalation

Any concerns about child-to-parent abuse should be reported to the DSL, who will consider what support can be offered to the family and whether a referral to children's social care or other services is appropriate.

10.9 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. FGM mandatory reporting duty for teachers - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Further information on when and how to make a report can be found at

- Mandatory reporting of female genital mutilation procedural information
- Multi-agency statutory guidance on female genital mutilation

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead (or deputy) and involve local authority children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

10.10 Forced Marriage

Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen following coercion, intimidation, threats and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or

decline the partner chosen for them by their families. A pupil who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear, that the proposed holiday will result in a forced marriage, may only become apparent after a number of conversations. These young women may also become victims of what is termed honour-based violence. This type of violence is described in 'The Right to Choose' guidance as:'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community.

As of 2023, it is now an offence to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families.

10.11 Homelessness

Our staff will alert the DSL of families becoming or at risk of becoming homeless, so that the DSL can refer to housing services at the earliest opportunity. Indicators for the risk of homelessness can include debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Duties introduced under The Homelessness Reduction Act 2017 shift focus to early intervention. For further information refer to Homeless Reduction Act Factsheets.

Temporary Accommodation Notification Duty:

Local housing authorities have a duty to notify the relevant local authority when a child who is owed a homelessness duty is placed in temporary accommodation in another local authority area.

This notification must include: the name and address of the temporary accommodation, the name of the child and their parent/carer and contact details

This helps ensure that the child's education and safeguarding needs are met. Staff should be aware that children in temporary accommodation may: experience frequent moves and changes of school, have disrupted education and face additional safeguarding risks

10.12 'Honour-based' abuse (HBA)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

10.13 Mental Health and self-harm

Our DSL, Louise Togher, is our trained Senior Mental Health Lead.
Many pupils referred to Ashley College have acute mental health needs and we recognise how important mental health and emotional wellbeing is for the whole school community. Our aim is to promote positive mental health and wellbeing for pupils, staff, families. We recognise that children's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. Through a whole-school approach and multi-agency work, we actively seek to promote emotional health and wellbeing by helping pupils to understand their feelings and the feelings of others.

Our role in school is to help our pupils to succeed, reach their potential and reintegrate to a mainstream setting by supporting them to improve their resilience and working with medical professionals to support and improve their mental health. We also have a role to ensure that pupils learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues and where they can go if they need help and support.

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

child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Self-harm and suicidal threats by a child/young person put them at risk of significant harm and should always be taken seriously and responded to without delay.
Common examples of deliberate self-harm include

- overdosing
- hitting, cutting or burning oneself
- pulling hair or picking skin
- self-strangulation.

Self-harm can be a coping mechanism, a way of inflicting punishment on oneself and a way of validating the self or influencing others. Self-harming is not attention seeking behaviour, it is attention needing behaviour.

Please see appendix 4 for the school's response to self-harm.

10.14 Private Fostering

We recognise the importance of identifying children in Private Fostering arrangements so that their needs can be fully assessed by the local authority. Ashley College will confirm the status of every pupil's care arrangements on admission (or when a pupil's care arrangements change) and notify the local authority of any known or suspected Private Fostering arrangement. We will support any subsequent assessment and remain alert to any additional needs that children placed away from their immediate families might face. See links for information on what constitutes private fostering and details of The Children's Act 1989: private fostering.

10.15 Recognising Extremism and Preventing Radicalisation (Prevent duty)

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools safeguarding approach.

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

Radicalisation risk indicators

There is no single route to radicalisation. However, there are some behavioural traits that could indicate that a learner is susceptible to radicalisation into terrorism. Radicalisation is not a linear process. Pupils may express a combination of behaviours at different times. Designated safeguarding leads (DSLs) should consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. In most cases, schools will speak with pupils and their families or carers (if under 18). Contextual, vulnerability and protective factors will also be taken in to consideration to make a comprehensive assessment of risk and harm.

Ashley College uses the 2023 DofE guidance on Manging risk of radicalisation in your setting.

The Prevent duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have **"due regard to the need to prevent people becoming involved with or supporting terrorism".** This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' wider safeguarding obligations.

10.16 Sexual Harassment

Any unwanted conducted of a sexual nature, which can occur online or offline is sexual harassment. Sexual harassment is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments (such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names)
- Sexual "jokes" or taunting
- Physical behaviour (such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature)
- Online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages (including online)
- sexual exploitation, coercion and threats.

All concerns about sexual violence and sexual harassment must be passed to Louise Togher.

Ashley College's child protection policy addresses all forms of discrimination and harmful attitudes. We recognise that both misogyny (prejudice against females) and misandry (prejudice against males) are forms of abuse that must be challenged and addressed. Our safeguarding procedures apply equally to all pupils regardless of gender, and we will take action against any form of gender-based discrimination, harassment, or abuse.

10.17 Serious Violence

All staff should be aware of indicators, which may signal that children (especially males) are at risk from, or are involved with serious violent crime. These may include

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs.

10.18 Substance Misuse

We recognise the clear role our school has to play in preventing drug misuse as part of our pastoral responsibilities. We will provide age appropriate information on drugs and alcohol and tackle problem behaviour, working with local partners to prevent drug or alcohol misuse. For further guidance refer to DfE and ACPO Drug Advice for schools. (ACPO has changed to the National Police Chiefs' Council). Parental Substance Misuse: Substance misuse (drugs or alcohol) may impact on parental capacity and can significantly exacerbate other concerns such as domestic violence or mental health issues. We will remain vigilant in identifying and supporting pupils and their families facing such issues, and work in collaboration with other agencies where necessary to prevent significant harm.

10.19 Trafficking, Modern Slavery and Financial Exploitation

Our school will remain alert for children trafficked into the country who may be registered at our school for a term or longer, before being moved to another part of the UK or abroad. We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, Traveller or migrant families – who collectively go missing from school. For further government guidance refer to Safeguarding Children who may have been trafficked practice guidance.

Modern slavery and financial exploitation are forms of abuse that staff must be aware of.
Modern slavery encompasses:
• Human trafficking
• Forced labour
• Domestic servitude
• Sexual exploitation

Financial exploitation involves:
• Taking control of a child's money or possessions
• Forcing a child to commit fraud or other financial crimes
• Using a child's bank account for money laundering
• Coercing a child into debt

Signs that a child may be experiencing modern slavery or financial exploitation include:
• Unexplained money, possessions or bank accounts
• Being controlled by others
• Appearing frightened, withdrawn or showing signs of physical or emotional abuse
• Working excessive hours or in dangerous conditions
• Having limited freedom of movement
• Living in poor or overcrowded accommodation

Any concerns about modern slavery or financial exploitation must be reported to the DSL immediately and may require referral to the police and/or the Modern Slavery Helpline (0800 0121 700).

10.20 Young carers

Ashley College recognises that young carers are a vulnerable group requiring additional safeguarding attention. Young carers are children and young people under 18 who provide care for a family member who has a physical or mental illness, disability, or substance misuse problem.

With so many adult responsibilities, young carers often miss out on opportunities that other children and young people have to play and learn. They may experience: • Educational difficulties and poor attendance • Physical and emotional health problems • Social isolation and bullying • Lack of time for play, sport and leisure activities

Ashley College is uniquely placed to identify and respond to concerns and 'triggers' where children and young people may require additional help as carers. We will: • Be alert to signs that a child may be a young carer • Provide early pastoral support • Work with families to ensure appropriate support is in place • Seek help from local authority support services for young carers where appropriate • Make reasonable adjustments to support young carers' education and wellbeing

Staff should be aware that young carers may not self-identify or may be reluctant to discuss their caring responsibilities. Any concerns about a young carer should be reported to the DSL.

11 Child on Child Abuse

We recognise that children are capable of abusing their peers.

11.1 Bullying

Our school’s policy on the prevention and management of bullying is set out in our Anti-bullying policy and is

reviewed annually. This policy includes reference to all types of bullying (including cyberbullying, prejudice-based bullying and discriminatory bullying). We acknowledge that to allow or condone bullying may lead to considerations under child protection procedures.

11.2 Sexual violence, sexual harassment and harmful sexual behaviour

Sexual violence and sexual harassment can occur between two children of any age and sex (although it is important to recognise the gendered nature of child on child abuse, i.e. it is more likely that girls will be victims and boys will be perpetrators).

Sexual violence includes:

• Rape: non-consensual penetration (however slight) of the vagina, anus or mouth with a penis
• Assault by penetration: non-consensual penetration (however slight) of the vagina or anus with any part of the body or object
• Sexual assault: non-consensual intentional sexual touching
• All sexual offences where the victim is under 13 years old (as children under 13 can never legally give consent)

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate (and individualised) support and that every effort is made to ensure that their education is not disrupted. It is also important that other children (including perpetrators) and staff are supported and protected as appropriate.

Child on child sexual abuse and or harassment must never be tolerated or passed off as ‘banter’ or part of ‘growing up’. Moreover, the school recognises the fact that even if there are no recorded cases of child on child abuse, this abuse may be taking place and simply not reported.

Where there is a safeguarding concern, the child’s wishes and feelings will be considered when determining what action to take and what services to provide.

Harmful Sexual Behaviour (HSB)

Ashley College recognises that harmful sexual behaviour exists on a continuum, from developmentally inappropriate behaviour through to criminal sexual violence. Harmful Sexual Behaviour is defined as sexual behaviour displayed by children that is developmentally inappropriate, may be harmful towards themselves or others, or be abusive towards another child or adult.

We understand that consent means having the freedom and capacity to choose to engage in sexual activity. Consent can be withdrawn at any time. Important legal facts about consent:
• A child under the age of 13 can never legally give consent to any form of sexual activity
• A child under the age of 16 can never legally give consent to sexual activity, though the law is applied differently in cases involving children of similar ages

Staff will refer to NSPCC resources on typical stages of sexual development to help identify when behaviour may be harmful. All concerns about Harmful Sexual Behaviour will be taken seriously and responded to in line with our safeguarding procedures.

When responding to concerns about harmful sexual behaviour, we will:
• Assess the behaviour against typical developmental stages
• Consider the context and any power imbalances
• Provide appropriate support to all children involved (victims and those displaying harmful behaviour)
• Work with specialist services where appropriate
• Recognise that children displaying harmful sexual behaviour may themselves be victims of abuse

11.3 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as

“banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

If a pupil makes an allegation of abuse against another pupil, staff should:

- Record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong:
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

11.4 Sharing of nudes and semi-nudes

If staff are made aware of an incident involving the making or sharing of nude or semi-nude images/videos, you must report it to the DSL immediately. This includes images that are digitally altered or wholly generated by artificial intelligence (e.g., deepfakes). All such incidents mandate a safeguarding response.

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders which Ashley College have adopted.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the making or sharing of nude or semi-nude images/videos, including: images that are digitally altered or wholly generated by artificial intelligence (e.g., deepfakes), pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, families and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will

receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact families or carers of the pupils involved (in most cases families should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
They will hold interviews with the pupils involved (if appropriate).
If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101 or contacting our safer schools officer Tony Joyce.

Recording incidents
All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage
Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

12 Procedures

The summary on Appendix 1 outlines possible indicators to help identify when an assessment may be needed to have a full understanding of child and family's needs. This will enable them to get the right support at the right time and prevent problems escalating.

If a pupil is in immediate danger of neglect, abuse, or self-harm. then an early help assessment is not the priority and the usual referral to the Brent Front Door should be made.

Social Care may conclude that the level 3 threshold has not been reached and an early help assessment may be appropriate. If a child's level of need does not place them in immediate danger then an early help assessment should be carried out, after seeking parental consent. Familys should be included in the assessment process and evidence sourced from all stakeholders, including the child.

12.1 The Early Help Assessment (EHA)

The EHA provides a common approach, common language and a holistic assessment of the family's needs, which is meaningful to the family because they have been supported to tell their story so that they can work in partnership with professionals to help achieve their goals. Early Help provides support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

The EHA can be used:

- To assess, plan and review a package of support to meet the family's agreed needs and goals.
- As a referral for targeted services across Brent's Children and Young People directorate.
- To nominate families as part of Brent's Working with Families (WwF) programme. In order to intervene at the earliest point, target help and support in a way that makes a difference to the lives of families, a good quality assessment and action plan are required.

The EHA is part of Brent's strategy to provide help to families at the earliest point of identification and to reduce the need for costlier specialist or statutory service interventions at a later stage.

12.2 Children in Need (CIN)

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

12.3 If a child is suffering or likely to suffer harm, or in immediate danger

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

12.4 Reporting your safeguarding concerns

Please also see appendix 2 and appendix 3. It is the responsibility of every member of staff and volunteer at Ashley College to know, understand and follow our Child Protection and Safeguarding Policy and Procedure. They should maintain an attitude of **'it could happen here'** where safeguarding is concerned and know what to look for.

If any member of staff or volunteer is concerned about a child they must inform the DSL or the Deputy DSL immediately. They must record information regarding the concerns on the same day. The written record must be a clear, precise, factual account of the observations or what has been said. Where there is a child protection concern, allegation or disclosure the DSL will make an immediate call to Brent Family Front Door to alert or to consult with them. The Multi Agency Referral Form will be sent by the DSL or Deputy DSL.

If in exceptional circumstance the DSL (or Deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Brent Family Front Door. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

If a member of staff disagrees about the level of concern and feels that a child has not been protected, then any member of staff can make a direct referral to Brent Family Front Door.

Within one working day of a referral being made, Brent Family Front Door should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL as required).

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following the London Safeguarding Children's Procedures on Professional Differences to ensure that their concerns are addressed and, most importantly, that the child's situation improves.

12.5 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them
- Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you - do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Log this on CPOMS (see Appendix 5)
- Speak to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

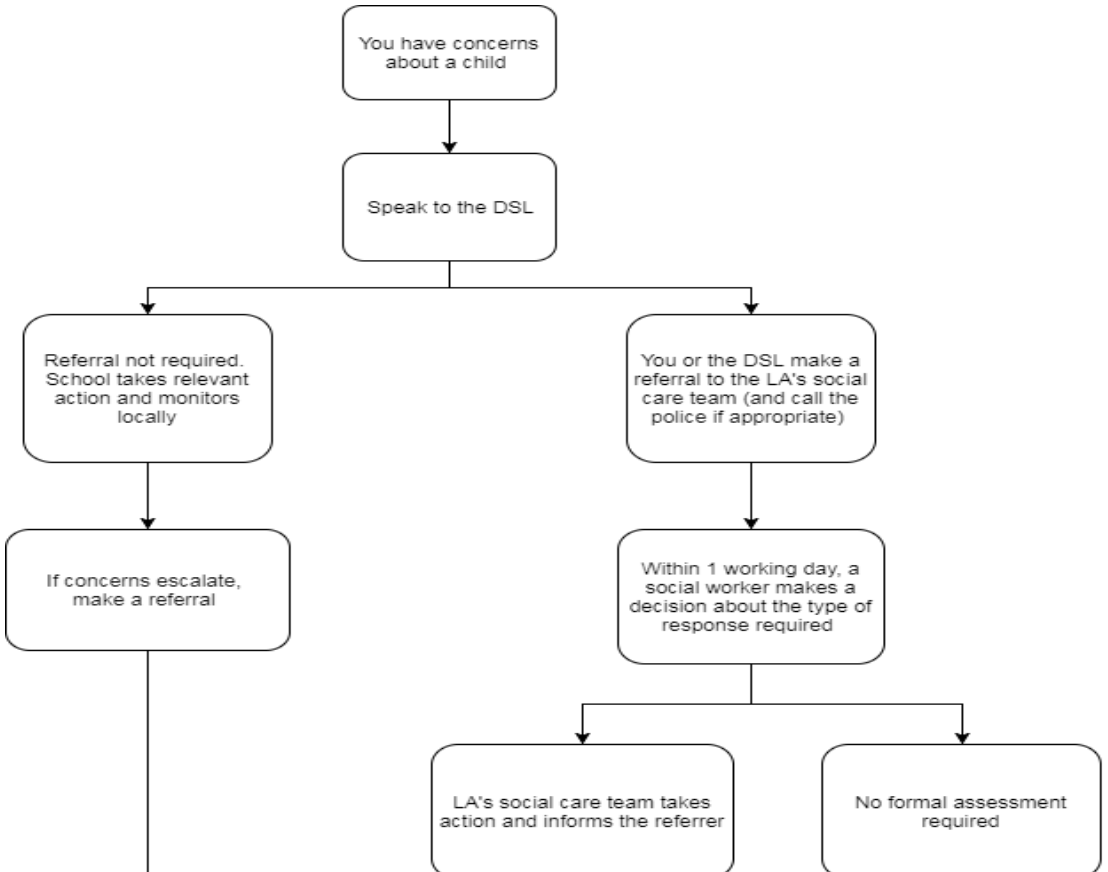
Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

12.6 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Please see next page for flowchart which illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.



12.7 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

12.8 If you have a concern about mental health

Many pupils referred to Ashley College have acute mental health needs and we recognise how important mental health and emotional wellbeing is for the whole school community. We recognise that children's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement.

Our role in school is to help our pupils to succeed, reach their potential and reintegrate to a mainstream setting by supporting them to improve their resilience and working with medical professionals to support and improve their mental health. We also have a role to ensure that pupils learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues and where they can go if they need help and support.

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

child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Where staff have a mental health concern about a pupil that is also a safeguarding concern, they should inform the DSL.

12.9 Allegations and Concerns About Staff (including supply teachers, volunteers and contractors)

When to report a concern or allegation

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff posing a risk of harm to children, you must report it immediately.

Who to report to:

- Report concerns to the **Headteacher** as soon as possible
- If the concerns/allegations are about the **Headteacher**, report to the **Chair of the Management Committee** (Nicky Chandarana)
- If you believe there is a conflict of interest in reporting to the Headteacher, report directly to the **Local Authority Designated Officer (LADO)**

Important: Under no circumstances should the member of staff concerned be told of the allegation until the Headteacher has liaised with the Local Authority.

Allegations involving external organisations
If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures and inform the LADO.

12.10 Allegations That Meet the Harm Threshold

We will refer to the LADO any allegations where it is alleged that anyone working in the school has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved in a way that indicates they may not be suitable to work with children (including behaviour outside of school)
- Discrimination. This means that any allegation that an adult working or volunteering with children has behaved in a manner that discriminates against a child on the basis of one or more of their protected characteristics (as defined by the Equality Act 2010) must now be referred to the LADO.

Procedure:

- Before contacting the LADO, we will conduct basic enquiries to establish the facts, being careful not to jeopardise any future police investigation
- The Headteacher will act as case manager and lead any investigation
- Where the allegation is against the Headteacher, the Chair of Management Committee will act as case manager

LADO Contact Details: Brent.LADO@brent.gov.uk

Full procedures are set out in Part 4 of Keeping Children Safe in Education 2025.

12.11 Low-Level Concerns About Staff

If a concern about the behaviour of a member of staff, supply teacher, volunteer or contractor does not meet the threshold for referral to the LADO or disciplinary action, the concern will still be addressed by the school.

Examples of low-level concerns include:

- Being over friendly with children

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

Any low-level concerns should be reported immediately to the Headteacher.

12.12 Whistleblowing and Staff Support

The school will strongly support 'whistle-blowers' and ensure that their anonymity, with regards to allegations or child protection issues, is preserved.

Staff should protect themselves by being mindful that even perfectly innocent actions can sometimes be misconstrued, especially when meeting on a one-to-one basis with students or when supervising students who are getting changed.

12.13 Statutory Referral Duties

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed or poses a risk of harm to a child, if that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. This includes supply teachers, volunteers and contractors.

The school will also consider whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

12.13 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

In school we will ensure that:

- There is clear signposting around the school about who is the DSL and the deputies and where to find them.
- Our PSHE curriculum regularly covers safeguarding
- Any pupil that makes a disclosure or speaks to a member of staff about a concern feels listened to, reassured that they have done the right thing in coming forward and given the time and space to feel listened to.

13 Online Safety and the use of mobile technology

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our Digital Safety/Social Media and Acceptable Use of Property Policy.

Technology is a significant component in many safeguarding and wellbeing issues. Pupils are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Pupils can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purpose.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

During PSHCE and as part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online. Pupils are specifically taught about safe use of the internet.

When pupils use the school's network to access the internet, they are protected from inappropriate content by our LGFL filtering system. We monitor our pupils and staff use of the internet via our Impero monitoring system. Reports from Impero are sent directly to the Headteacher. Any report containing serious concerns will be shared with the DSL. The DSL will follow up on all reports of concern directly with the students and families if deemed a significant safeguarding issue. These are all logged on CPOMS as safeguarding concerns under the “filtering and monitoring” category.

When students are using online technology, they are guided carefully and given a high level of supervision.

13.1 Mobile Phones

Pupils are allowed to bring their mobile phones to school but will need to hand them in to office staff upon arrival. Mobile phones are stored in each child’s named pouch and locked away for the duration of the school day. Mobile phones are handed back to the pupils when they leave and sign out at the end of the day.

It is the responsibility of staff to teach and model acceptable use of mobile phones.

- Staff should not use private mobile phone contact families/carer.
- Staff should use a school issued mobile phone if they wish to contact families
- Staff should not be carrying a personal mobile phone while supervising pupils
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Staff will take a school mobile phone on trips
- Staff will use their professional judgement in emergency situations.

Office staff, Home Tutors and all members of SLT have been issued with a work mobile phone. This is the only mobile phone that should be used to contact families, children and other professionals.

13.2 Filtering and Monitoring

Ashley College has appropriate filtering and monitoring systems in place to protect pupils online. These systems are reviewed at least once every academic year by the Headteacher (who is the Senior Leadership Team member responsible for filtering and monitoring), supported by the Designated Safeguarding Lead (DSL) Louise Togher and our IT support provider.

This annual review ensures our systems remain effective and appropriate for our pupils' needs. The review includes:
• Assessing whether the filtering and monitoring systems are working effectively
• Checking that staff understand the systems and their responsibilities
• Reviewing any incidents or concerns that have arisen
• Making any necessary improvements to our systems and processes

The leadership team and staff are aware of the provisions in place, and understand their expectations, roles

and responsibilities around filtering and monitoring as part of safeguarding training.

We have reviewed the DfE's filtering and monitoring standards, and work with our IT staff and service providers to ensure we meet these standards.

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made.

Through our association with the London Grid for Learning and Impero we make sure that the school's filtering and monitoring systems are functional and effective. All school devices used on or off site are subject to filtering and monitoring procedures.

Staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns.

13.3 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and families may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Ashley College recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse and/or expose pupils to harmful content.

Safeguarding risks associated with AI include:
• Creation of 'deepfakes' – AI-generated images, audio or video that appear real but are fake, which can be used for bullying, harassment, or creating indecent images
• Exposure to inappropriate or harmful content through AI chatbots
• Grooming or exploitation facilitated through AI tools
• Data protection and privacy concerns
• Misinformation and disinformation

Ashley College will:

• Treat any use of AI to access harmful content, create deepfakes, or bully pupils in line with this policy and our behaviour policy
• Educate pupils about the risks and safe use of AI through our PSHE and online safety curriculum
• Carry out risk assessments for any new AI tool being used by the school
• Apply our filtering and monitoring requirements to the use of AI, in line with Keeping Children Safe in Education
• Ensure staff are aware of the risks of using AI tools and understand how to report concerns

Staff should be aware that:

• AI can be used to create realistic but fake images of children, including indecent images
• Making or sharing AI-generated indecent images of children is illegal and constitutes child sexual abuse
• Any concerns about AI-generated abuse material must be reported to the DSL immediately

Ashley College has a separate Artificial Intelligence policy which sets out our approach to the use of AI in school.

14 Working with families

Our preference is to discuss any Child Protection concerns with families / carers before approaching other agencies, and we will endeavour to seek families' consent before making a referral to another agency. However, there will be occasions when the school will contact another agency before informing families because it considers that in the best interests of the child or that contacting families may increase the risk of significant harm to the child. Other staff will only talk to families or carers about any such concerns following consultation with the DSL.

In the case of allegations of abuse made against other children, we will normally notify the families or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's families or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's families or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

15 Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

16 Looked after children and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth families or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We work with virtual schools to promote the educational achievement of looked-after and previously looked-after children.

We have appointed a designated teacher, Louise Togher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

17 Pupils with special educational needs, disabilities and/or health needs

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs,
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

In our school we identify pupils who might need more support to be kept safe or to keep themselves safe. We do this in the following ways:

- Children will have a familiar adult to support with communication through simplified language ensure that questioning and answers are put in a manner accessible to the child
- Extra pastoral support is considered for children with SEN and disabilities
- Use of visual aids and sign language to support understanding where this is required
- Children are carefully monitored and observed to provide a full picture of their behaviour and mannerism so that any changes are noted, and a comparison can be made
- If required, the use of body maps, visuals and sign language are used to allow children to communicate their needs or concerns
- If appropriate, the use of social stories can be used to support appropriate and inappropriate behaviour (e.g. bullying).

Ashley College recognises that pupils with medical conditions (all pupils are educated under section 19 of the education act) may face additional safeguarding challenges and barriers to recognising or disclosing abuse or neglect.

We are aware that:

• Medical conditions can impact a child's ability to communicate concerns
• Some medical conditions may make children more vulnerable to abuse
• Changes in behaviour may be attributed to medical conditions rather than safeguarding concerns
• Pupils may require intimate care which increases safeguarding risks

Staff will:

• Be alert to signs of abuse in pupils with medical conditions
• Not assume that changes in behaviour or presentation are solely due to medical conditions
• Ensure that individual healthcare plans include safeguarding considerations
• Work closely with families and medical professionals
• Report any safeguarding concerns to the DSL immediately

Further information about supporting children with medical needs can be found in our Supporting Pupils with Medical Conditions Policy.

18 Pupils who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. Please see our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism (ASD) and/or attention deficit hyperactivity disorder (ADHD).

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

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out

or share their concerns with members of staff.

Any pupil attending Ashley College who is gender questioning will initially be referred to by their birth gender and name unless advised otherwise by their clinical team.

19 Safer Workforce

19.1 Safer Recruitment

Ashley College has a separate Safer Recruitment Policy which specifies how all staff and volunteers must be recruited, following robust recruitment and selection process, including DBS and thorough reference checks. The aims of the Safer Recruitment Policy are to help appoint the most suitable people to work with our pupils and to deter, reject or identify people who might harm pupils or are otherwise unsuitable to work or volunteer in our school.

Any volunteer who frequently teaches, trains, instructs, or supervises children is legally in regulated activity and requires an enhanced DBS check with children's barred list information. This requirement reflects changes introduced by The Crime and Policing Act 2026.

There is no supervision exemption for volunteers in regulated activity. Previous guidance on supervision exemptions (formerly contained in Annex E of KCSIE) has been completely removed. All volunteers who frequently work with children must be checked against the children's barred list, regardless of supervision arrangements. 'Frequently' means: carrying out the activity once a week or more; or carrying out the activity 4 or more days in a 30-day period; or overnight (between 2am and 6am)

19.2 Safer working practice

All school staff and volunteers should take care not to place themselves in a vulnerable position with a child. Our Staff Code of Conduct forms part of Ashley College's compulsory training for all staff and volunteers.

20 Health and Safety

Our Health & Safety policy and our Educational Visits Policy is set out in separate documents. They reflect the consideration we give to the protection of our children both within the school environmentand when undertaking school trips and visits away from the school environment.

20.1 Accidents and Welfare

If an accident occurs, the student/s are sent to a designated first aid person. This member of staff thenjudges whether any medical attention is required. In cases when students are medically attended to, a letter is sent home to the families and a copy of incident kept on file and entered onto borough's electronic service y administrator or bursar.

Where a student requires medication regularly, a meeting is held with the Headteacher or Deputy Headteacher and family and a plan is set out, outlining the frequency of the medication and dosage. The parent also signs a letter to consent that a member of staff can administer the medication.

20.2 Site Safeguarding

The school safeguards the site in a variety of ways:

- All entrances to the school building are secure
- Access to the school site is via the main office and all visitors are expected to sign in and wear a visitor's badge
- All members of the school have an identification badge, which has their name and role
- The site manager carries out a weekly survey and tests the fire alarm

On-going issues are raised by staff and reported to the front office for the site staff to deal with.These are monitored regularly and actions relevant actions taken.

Visitors (including contractors) to the school whilst children are expected to be on site must:

- All visitors will be required to verify their identity to the satisfaction of Office Staff
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification
- Visitors are expected to sign in on inventory and wear a visitor's badge.
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

    - Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
    - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

21 Physical Intervention

The school's approach to physical intervention and positive handling by staff complies with the DfE's statutory guidance on restrictive interventions (including reasonable force and seclusion), effective from 1 April 2026. Staff may only use reasonable force, meaning no more force than is needed to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Headteachers and other authorised trained staff can use such force/restraint as is reasonable in the circumstances to conduct a search for the following prohibited items: knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, mobile phones or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

Where the use of force is necessary, plans and reasonable adjustments should be made for disabled children and children with special educational needs. Any use of force or restraint must be recorded on CPOMS under the Physical Restraint category and the family should be informed of the incident.

All staff receive regular training on the use of restrictive interventions in line with the DfE's April 2026 guidance. This training covers:
• What restrictive interventions are and when they may be necessary
• How to use preventative strategies and de-escalation techniques effectively
• How to use restrictive interventions safely and lawfully
• Recording and reporting requirements
• The specific needs and vulnerabilities of pupils at Ashley College

Our recording and reporting procedures for restrictive interventions align with the DfE's statutory guidance and ensure that all incidents are properly documented, reviewed, and reported to families and relevant authorities as required.
Please see the school's Behaviour Policy

22 Monitoring Arrangements

This policy will be reviewed **annually** by the DSL and Headteacher. At every review, it will be approved by the full management committee.

APPENDIX 1 – A guide to the Levels/Thresholds Continuum of Need

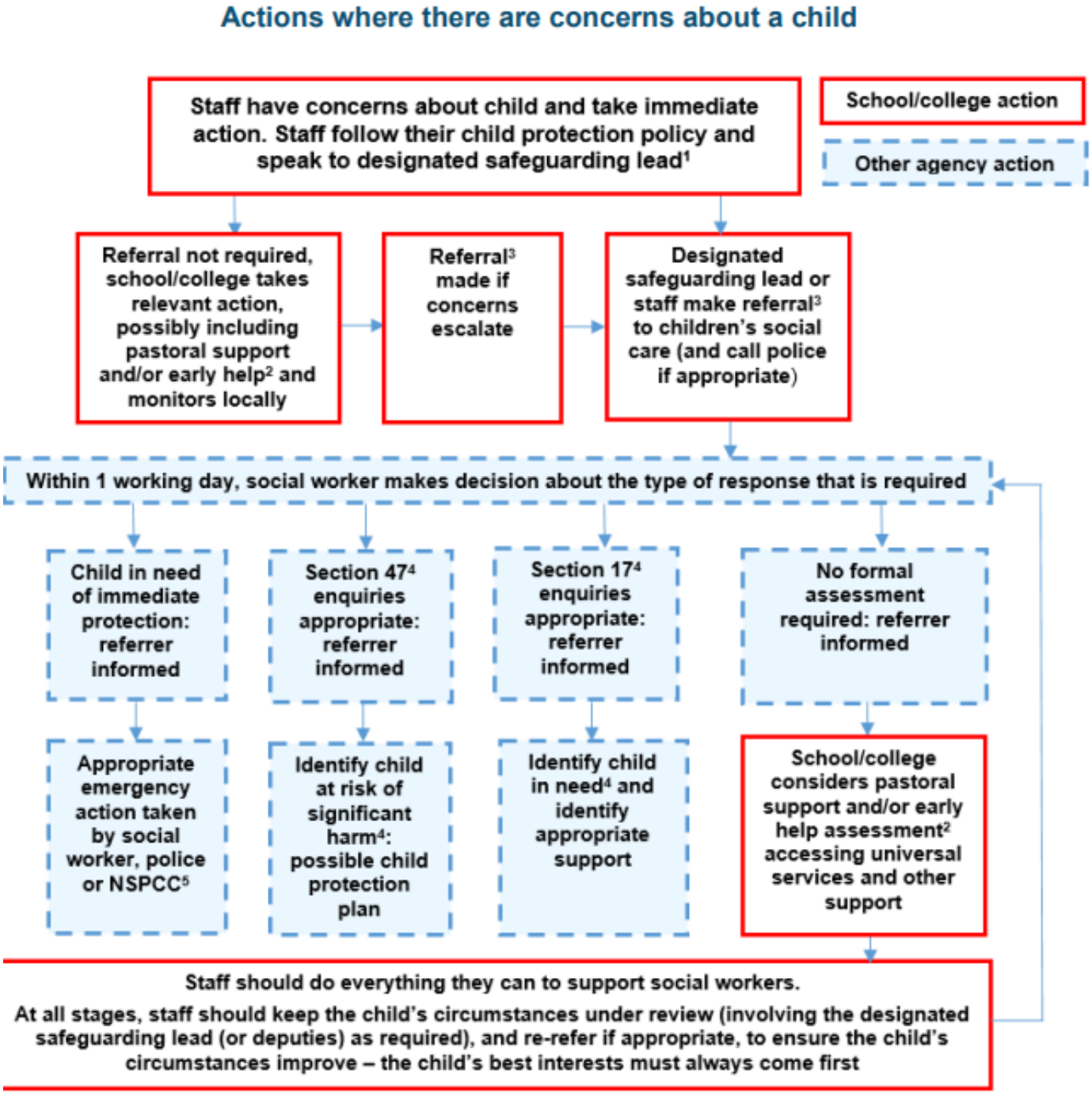
A Guide to the Levels/Thresholds Continuum of Need

The following table is a guide to help you identify when an assessment may be needed to have a full understanding of child and family's needs. This will enable them to get the right support at the right time and prevent problems escalating.

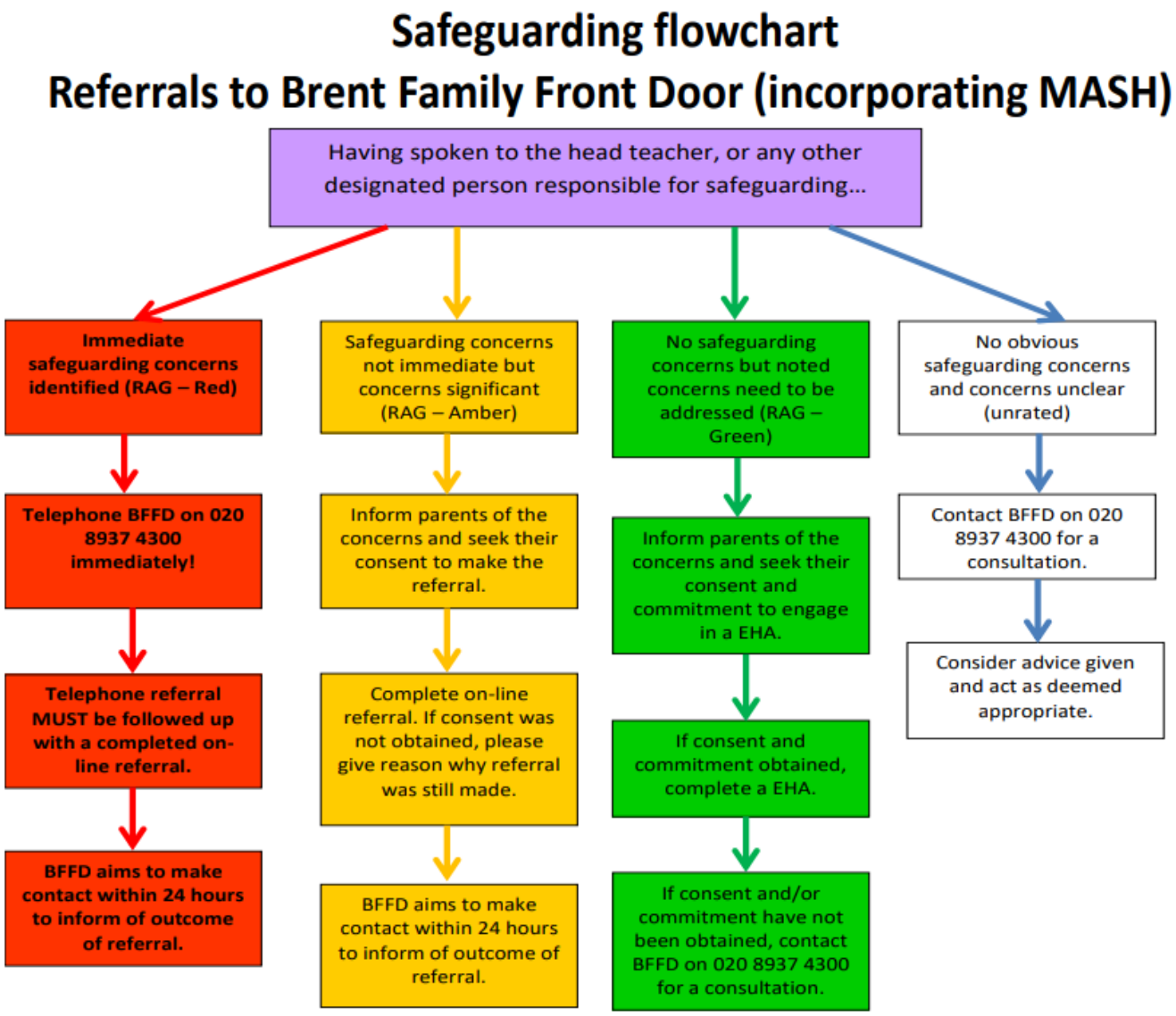
	Level 1-Universal Child has no additional needs	**Level 2-Targeted** Child has low level additional needs	**Level 3-Specialist** Child has complex needs	**Level 4-Statutory** Child has acute needs
Child	➢ All children use universal services. ➢ Child's developmental **needs are met** by universal services. ➢ Children expected to do well with minimum intervention from any additional service.	➢ Child with **low level additional needs not being met** but likely to be short term. ➢ Child's **needs are not clear, not known or not being met**. ➢ Child/family **need additional help** to prevent problems becoming more difficult to resolve.	➢ Child has **complex needs** likely to require longer term interventions from targeted, statutory and/or specialist services. ➢ Child has **high level of unmet needs** that may require a targeted integrated response including specialist or statutory services. ➢ Child may meet threshold for Early Help Assessment, Child & Family Assessment or intervention.	➢ Child who has **suffered, or at risk of suffering, significant harm** requiring intensive statutory / specialist support i.e. Children's Social Care or Youth Offending Service. ➢ May include meeting threshold for child protection / local authority care. ➢ Children's Social Care take lead in safeguarding & coordinating services
This includes...	➢ The child has **no additional needs** and whose developmental needs are met by universal services. ➢ The child achieving expected outcomes. ➢ No Early Help Assessment required.	➢ Parents/carers are under stress that possibly impacts on their parenting capacity. ➢ Child's **health & development may be adversely affected** without multi-agency intervention to prevent child's needs becoming more complex/acute. ➢ Early Help Assessment required. Lead practitioner allocated & 'Team Around Family' (TAF) initiated.	➢ Child unlikely to experience reasonable standard of development/health and is **at risk of longer term poor outcomes** without provision of coordinated targeted services. ➢ Early Help Assessment or Child & Family Assessment may be required. ➢ Lead practitioner allocated. ➢ Possible need to 'step up' to, or has 'stepped down,' from Children's Social Care. ➢ Without support family are likely to become in need of acute services. ➢ Allocated social worker will be the lead professional	➢ Child will have **suffered, or is at risk of suffering, significant harm**. ➢ There are **serious concerns about child's health & development**, or child assessed to be suffering neglect/abuse. ➢ Child may need to be looked after by the local authority either on a voluntary basis or through a Court Order.

	Level 1-Universal Child has no additional needs	**Level 2-Targeted** Child has low level additional needs	**Level 3-Specialist** Child has complex needs	**Level 4-Statutory** Child has acute needs
Agencies involved may include...	➢ Education ➢ Family Wellbeing Centres ➢ Child Minders ➢ Nurseries ➢ Early Years ➢ GP ➢ Dentist ➢ Health Visitors ➢ School Nurses ➢ Midwives ➢ Housing ➢ Voluntary & Community Sector ➢ Faith Groups	➢ All agencies identified in Level 1 ➢ Education Psychology/Welfare ➢ Inclusion Support Team ➢ Youth crime prevention services ➢ Targeted drug and alcohol services ➢ Family Support Services ➢ Special Education Needs Assessment Service (SENAS)	➢ Agencies identified at Levels 1 & 2 ➢ Youth Offending Team ➢ CAMHS ➢ Child Psychology ➢ Education Welfare ➢ Early Help Service (including Accelerated Support Team) ➢ Police	➢ Agencies identified at levels 1, 2 & 3 ➢ Children's Social Care
Assessment Process...	➢ Child should access universal services in normal way using each services' referral process. ➢ No assessment required.	➢ Where multiple agencies are involved an Early Help Assessment may be required. ➢ Depending on the severity of need, a decision will be made about whether the Early Help Services or from Children's Social Care services are involved.	➢ Referrals made via Brent Family Front Door. ➢ An Early Help Assessment or Child & Family Assessment may be required, lead practitioner allocated and evidence of interventions or support already provided can assist decision making. ➢ Assessment may be used as evidence to gain specialist or targeted support by requesting agencies.	➢ The child will require a coordinated multi-agency response from both statutory and non-statutory services. ➢ The lead professional will be the statutory social worker who will be responsible for co-ordinating the core group (child protection) or a child in need plan.

APPENDIX 2 – Actions where there are concerns about a child



APPENDIX 3 - Safeguarding Flowchart



APPENDIX 4 - Serious Incident Protocol including incidents of Self-harm

Serious Incident Protocol including incidents of Self-harm

* **Where any such acts as listed below occur the 'Serious Incidents Protocol' is to be activated**

****A serious incident*** is defined as: any incident involving young persons and/ or members of staff in our school community where an individual/s personal, physical, mental or emotional safety has been seriously compromised on school premises or is at immediate, critical risk of harm or compromise or threat unless immediate action is taken.

Serious incidents include:

All Inappropriate/ sexual touching,

All incidents of self-harm,

All acts of serious physical / violence with an offensive weapon,

All acts of physical threat with an offensive weapon

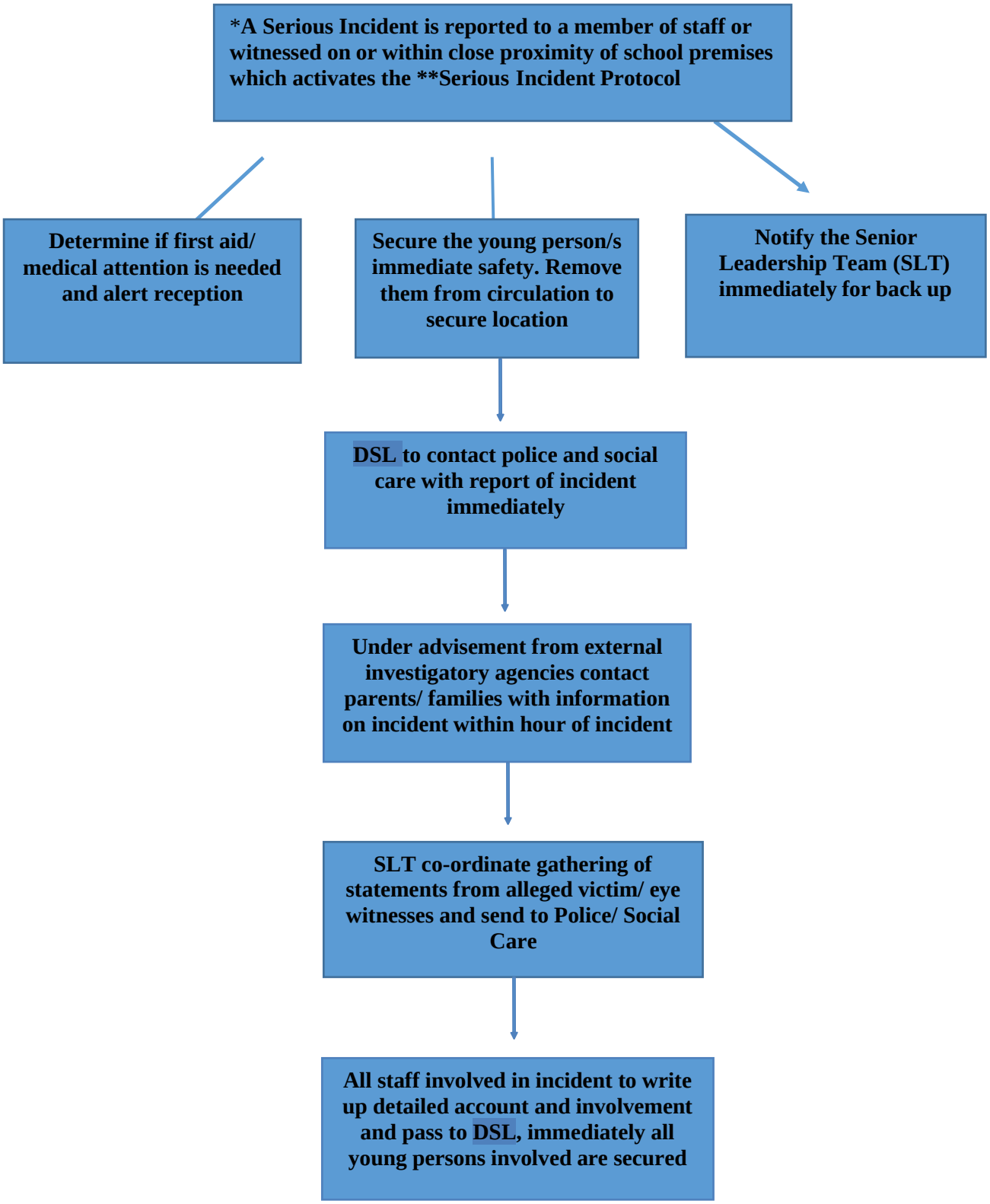
All acts of sexual activity, contact between young persons

All acts of sexual violence or sexual threat to a young person or member of staff on school site

All known acts of sexual activity, contact / sexual violence or sexual threat to a young person off school site

APPENDIX 4a – Serious Incident Protocol for Ashley College

Serious Incident Protocol for Ashley College



APPENDIX 5 - Staff Reporting Concerns

