



Darul Uloom London School

# SAFEGUARDING POLICY

Last Reviewed: Monday, 17th February 2020  
Next Review: Monday, 15th February 2021

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# 1. SAFEGUARDING POLICY

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## INTRODUCTION

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Darul Uloom London fully recognises its responsibility for safeguarding and child protection and is aware that the safeguarding and promotion of the welfare of children are of paramount importance.

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## THE POLICY

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The whole ethos of Darul Uloom London aims to create an atmosphere of mutual respect and understanding of the needs of others, the promotion of British values and the stern stance against any act of terrorism, thus developing a sense of self-esteem and fulfilling an awareness of the importance of tolerance and co-existence. This is intrinsic in the aims and objectives of the school.

Darul Uloom London recognises that the threshold of tolerance is different for everyone. This Policy identifies the need to respect and support the needs of the individual in this domain.

We accept all applicants regardless of disability, ethnicity and sexual orientation. However, where a pupil has specific SEN, behaviour or emotional or physical needs, the school will develop an individual, robust welfare plan in partnership with all relevant stake holders.

This policy applies to all of the school community including senior managers, the Board of Trustees, paid staff, volunteers, sessional workers, agency staff, students or anyone working on behalf of Darul Uloom London.

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

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## REGULATORY GUIDANCE

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This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004; with due regard and compliance to government publications including:

- Keeping Children Safe in Education (KCSIE), 2019
- Working Together to Safeguard Children, 2018
- The Counter-Terrorism and Security Act 2015
- The Serious Crime Act 2015
- Prevent Duty Guidance, 2015
- The Prevent duty, 2015
- The National Minimum Standards for Boarding Schools, 2015
- Ofsted-Inspecting safeguarding in early years, education and skills settings, 2016
- The Education (Independent School Standards) Regulations 2014
- Education Act 2002
- The London child protection procedures, 2015
- What to do if You are Worried a Child is Being Abused, 2015
- Bromley Safeguarding Children Board Procedures
- Voyeurism (Offences Act) 2019
- Sexual violence and sexual harassment between children in schools and colleges, 2018

## AIMS

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The central aim of the policy is to ensure the safety and well-being of pupils in accordance with the above legislation. More specifically, the aims are to:

- Ensure all of the school community are aware of how to keep safe, recognise and report behaviour that is contrary to safeguarding.
- Recognise and support any child who has been subject to abuse.
- To deal appropriately with every suspicion or complaint of abuse;
- Ensure any paid/ voluntary staff appointed is done in accordance to safer recruitment procedures.
- To design and operate procedures which promote this policy;
- To, ensure that false allegations do not prejudice those who are innocent;
- To be alert to the medical needs of children with medical conditions;
- To have regard to sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and Associated regulations issued by the Secretary of State for Education (DfE)
- To identify, assess and act accordingly to those who are vulnerable to radicalisation, including providing support against extremist ideas
- To establish a safe and secure environment in which children can learn and develop
- To ensure that children on the school register, of compulsory school age do not miss out on parts of their education through continuous absenteeism
- To support the child's development in ways that will foster security, confidence and independence.
- To develop and promote effective working relationships, including with other agencies, especially the Police and Social Services.

We recognise that staff are well placed to observe the outward signs of abuse. The school will create a positive ethos amongst the staff so that we can:

- Establish and maintain an environment where children feel safe, secure, valued and respected and that they feel confident and are encouraged to talk knowing that they are listened to.
- Ensure children know that there are adults in the school whom they can approach if worried
- Include opportunities in the PSHCE curriculum for children to develop the skills they need to recognise and stay safe from abuse.

These aims are affected by the following means

- Education: Through the curriculum (particularly but not solely through Personal, Social and Health Citizenship Education (PSHCE) lessons and Islamic Studies) the School aims to teach pupils to understand what acceptable behaviour is and to speak up if they believe they or others are not being treated appropriately.
- Staff Handbook: This contains the staff code of conduct, roles and responsibilities of staff and other relevant information in regard to safeguarding, behaviour and health and safety.
- Staff Training: Safeguarding training for all staff is undertaken regularly as advised by the Bromley Safeguarding Board at specific intervals. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively for staff recruited between these training sessions. There are safeguarding forms as part of the induction. Additionally, there are mechanisms in place to

test staff knowledge on safeguarding. This includes pop questions during staff meetings or questionnaires.

- Temporary staff and voluntary staff who work with our children are to be made aware of the school's arrangements and attend a training session with the DSL or his deputy.
- There is a designated person identified in respect of safeguarding children and young people. This is explicit in their job description. The DSL and his Deputy have been fully trained for the demands of this role in child protection and inter-agency working. The DSL's attends update and review training by the Bromley Safeguarding Children's Board every two years and have their knowledge and skills refreshed annually. The school's Designated Safeguarding Lead is responsible for the training of all staff in safeguarding issues. Records of all those who have attended training are kept centrally. The roles of the DSL and Deputy are explicit in their job role.
- All appropriate members of staff have received Safer Recruitment training.
- Preventing extremism and terrorism (PREVENT) training is also provided annually

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### RAISING AWARENESS WITH PUPILS

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Darul Uloom London prides itself on its culture of open and effective communication between staff and pupils, and on its excellent pastoral support structures. We prepare all of our pupils to make reasoned, informed choices, judgements and decisions. Time is allocated for discussions and advice around safeguarding and also in developing within pupils the confidence of that which they require to recognise abuse. This includes advice on how to deal with abuse between pupils. All pupils know that there are a range of trusted people to whom they can turn to if they are worried. This also includes the independent listeners (Yasar Zaman and Abdul Alim). The independent listener's contact details are displayed on information boards around the school.

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### LOOKED AFTER CHILDREN

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The most common reason for children becoming looked after is as a result of abuse and/or neglect. The trustees will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

If the school becomes aware that a pupil may be in a private fostering arrangement, with someone to whom they are not related in that person's home, The DSL will notify the Local Authority Children Services.

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### CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

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Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. The trustees ensure that staff are aware of the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury related to the child's disability without further exploration;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

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## SAFER RECRUITMENT PRACTICES

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Darul Uloom London will always follow safer recruitment procedures so that we can be confident that all staff working in our school are safe to do so and no child is at risk. A conditional offer of employment is made whilst these are in process.

**Disclosure and Barring Service (DBS) Checks:** An enhanced DBS disclosure is required for all new appointments to the school. The school also insists on enhanced DBS checks for all drivers of taxis used by the school and has robust processes to check the suitability of contract staff and others working on the school site. The school is committed to reporting to the DBS any person (whether employed, contracted, volunteer or student) whose services are no longer used, and the DBS referral criteria are met. The enhanced DBS check with barred list information and acceptable references will be required before they begin work. At least one person in each recruitment process will have up to date safer recruitment training.

**Other recruitment checks:** These are carried out in line with KCSIE 2019, this includes, bared list checks, prohibition checks, references etc. Guidance including running the checks on the Employer Access online service. All checks are carried out through the school's HR department. All records are kept via the Single Central Register (SCR) and stored securely.

Please see the school safer recruitment policy for more details on the school's safer recruitment practices.

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## TRANSPARENCY

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Darul Uloom London prides itself on its respect and mutual tolerance. Parents have an important role in supporting our school. We hope that all of the school community (parents, children, staff etc.) will always feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior management team.

Where someone feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels are:

- The Staff disciplinary, grievance and whistleblowing Policy
- The NSPCC whistleblowing helpline is available for all who do not feel able to raise concerns regarding child protection failures internally. Their contact details are 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

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## WHISTLEBLOWING

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All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Where a staff member feels unable to raise an issue, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing.
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk12

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## INTERACTION WITH PUPILS: CODE OF CONDUCT FOR STAFF

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Members of staff are given copies of the Darul Uloom London's Staff handbook. Discussion of the procedures set out in our staff handbook forms a vital part of our induction procedure. It provides guidance for staff, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of abuse. It also provides guidance for staff, on how to deal with concerns and who to refer to when in need of assistance. The staff handbook is reviewed annually.

In order to ensure that staff are safe and aware of behaviours that should be avoided to ensure the prevention of risk of allegation they must need to;

- Be responsible for their own actions and behaviour and should avoid any conduct which would lead any person to question their motivation and intentions;
- Work in an open and transparent way.
- Take advice from DSL over any incident which may give rise to concern.
- Record any incidents or decisions made.
- Apply the same professional standards consistently.
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

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## EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

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Where extended school activities are provided by and managed by the school, our own Safeguarding Policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential trips and work-related activities, we will check that effective safeguarding arrangements are in place.

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## FIRST AID AND MEDICAL PLANS

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Except in cases of extreme emergency, first aid will only be administered by qualified first aiders. All first aid treatment will be recorded and when needed will be shared with parents. Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a medical plan that has been agreed with parents.

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## CONFIDENTIALITY

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Confidentiality is covered by the school's data protection policy, in line with the data protection legislation and GDPR (2018). All records of confidential or personal nature are kept securely with the DSL and kept under lock and key. Whilst the Data Protection legislation places duties on organisations

and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children

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## CONTRACTORS

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Contractors who work on the school site will be made aware of this policy. Long-term contractors who work in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the SMT deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors and their employees to have direct access to pupils in non-teaching times.

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## 2. WHAT IS SAFEGUARDING AND CHILD PROTECTION?

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It is recognised that children need protection from:

- Physical harm
- Emotional abuse
- Sexual abuse
- Neglect
- Harmful material on the Internet

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protect children from other harms (e.g. drugs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences

### **What is child abuse?**

Child abuse is the term used when an adult/pupil harms a child or a young person under the age of 18. Child abuse can take four forms, all of which can cause long-term damage to a child: physical abuse, emotional abuse, neglect and child sexual abuse. Bullying and domestic violence are also forms of child abuse.

Remember, this list does not cover every child abuse possibility. You may have seen other things in the child's behaviour or circumstances that worry you. Abuse is always wrong, and it is never the young person's fault.

### **Types of Abuse**

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

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

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

Child abuse can take many forms, but is usually divided into the following categories: They are defined in the DfE Statutory Guidance 'Keeping Children Safe in Education' (2019) as follows:

### **Physical abuse**

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

Physical indicators include:

- Unexplained bruises/welts/lacerations/abrasions: on face, lips, mouth or torso, back, buttocks, thighs, in various stages of healing
- clustering, forming regular patterns
- reflecting the shape of an article used e.g. belt, buckle, electrical flex
- On several different surface areas
- Bite marks or fingernail marks which regularly appear after absence, e.g. after a weekend
- Unexplained burns:
- Cigar or cigarette burns, especially on soles, palms or back
- Immersion burns where hands, feet or body have been forcibly immersed in very hot water patterns like electrical burner, iron etc.
- Rope burns on arms, legs, neck or torso
- Unexplained fractures to skull, nose, facial structure in various stages of healing
- Multiple or spiral fractures

Behavioural indicators include:

- Flinching when approached or touched
- Reluctance to change clothes for P.E. lessons
- Wary of adult contacts
- Difficult to comfort
- Apprehension when other children cry
- Crying or irritability
- Frightened of parents
- Afraid to go home
- Rebelliousness in adolescence
- Behavioural extremes – aggressiveness, withdrawal, impulsiveness
- Reports injury caused by parents
- Depression
- Poor peer relationships
- Panics in response to pain

### **Neglect**

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

the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical indicators of neglect include:

- consistent hunger
- inappropriate dress
- consistent lack of supervision, especially in dangerous activities for long periods
- unattended physical problems or medical needs
- abandonment

Behavioural indicators include:

- begging; stealing food
- constant fatigue, listlessness
- poor relationship with care-giver
- frequent delays in picking the child up from school

### **Sexual abuse**

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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

Physical indicators include:

- Difficulty in walking or sitting down
- stained or bloody underclothing; pain or itching in the genital area
- bruising, bleeding, injury to external genitalia and/or anal areas
- bed wetting
- excessive crying
- sickness

Behavioural indicators include:

- Inappropriate sexual behaviour or knowledge for the child's age
- Promiscuity
- Sudden changes in behaviour
- Running away from home
- Wary of adults
- Feeling different from other children
- Unusual avoidance of touch
- Reporting of assault
- Substance abuse e.g. glue sniffing
- Emotional withdrawal through lack of trust in adults
- Over-compliance with requests of others

- Frequent complaints of unexplained abdominal pains
- Eating problems or sleeping disturbances
- Poor peer relationships
- Possessing money or 'gifts' that cannot be properly accounted for
- Inappropriately sexually explicit drawings or stories
- Enuresis or soiling, especially at the end of the school day
- Frequent non-attendance at school
- Avoidance of school medicals

Sexual violence as defined by the sexual violence and sexual harassment advice 2018 as any offence under the Sexual Offences Act 2003. Sexual harassment is defined as 'unwanted conduct of a sexual nature' that can occur online and offline. The same guidance also defines harmful sexual behaviour as sexual behaviour that is inappropriate, problematic, abusive and/or violent.

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Physical indicators include:

- Failure to thrive
- Delays in physical development or progress

Behavioural indicators include:

- Sucking, biting, rocking
- Anti-social, destructive behaviour
- Sleeping disorders, inhibition of play
- Compliant, passive, aggressive, demanding, inappropriately adult or infant behaviour
- Impairment of intellectual, emotional, social or behavioural development

### **Child sexual exploitation (CSE)**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

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

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

### **Sexting**

There is a number of definitions of sexting but, for the purposes of this policy, sexting is simply defined as images or videos generated by children under the age of 18, or of children under the age of 18, that are of a sexual nature or are indecent. These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know. Sexting may be categorised as:

Aggravated incidents of sexting involving criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who was pictured.

Experimental incidents of sexting involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation. Wolak and Finkelhor 'Sexting: a Typology' March 2011

Young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988.

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

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

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

In cases of 'sexting', Darul Uloom London will follow the guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: Sexting in schools and colleges, responding to incidents, and safeguarding young people.

### **Peer on peer abuse**

Peer on peer abuse should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. It must be recognised that this form of abuse is gendered in nature (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously.

The different forms peer on peer abuse can take, such as:

- sexual violence and sexual harassment. Part five of this guidance sets out how schools and colleges should respond to reports of sexual violence and sexual harassment;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting (also known as youth produced sexual imagery): the policy should include the school’s or college’s approach to it;
- initiation/hazing type violence and rituals.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

### **County Lines**

The UK Government defines county lines as:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store

the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

### **‘Honour-based’ violence and Female genital mutilation (FGM)**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

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

Symptoms of FGM

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

Indications that FGM may have already taken place may include:

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

So-called ‘honour-based’ violence (HBV) encompasses 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. All forms of so-called HBV 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 girl being at risk of HBV or already having suffered HBV. There is a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM and in KCSIE 2018 focus on the role of schools and colleges and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage. If

staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. From October 2015 every adult who is concerned about a child who may be at risk of FGM has an obligation to report this to the police. This is included in this policy as it could be a member of the child's family who has/will undergo the procedure and they are making a disclosure on their behalf.

Staff 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 a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve 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, staff should follow local safeguarding procedures.

#### Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. If it is found that a forced marriage has taken place with any child then the DSL will refer to The Forced Marriage Unit's Multi-agency guidelines, pages 32-36 and Contact the Forced Marriage Unit if any further advice or information is required: 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

#### Radicalisation and the Prevent duty

The school has a legal duty to have due regard to the need to prevent people from being drawn into terrorism. The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The school is committed to providing a safe space in which children and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. Any instance where a pupil/family member of a pupils shows signs of radicalisation a risk assessment will be carried out. The school has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas".

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism". There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following: There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances. Referrals to Channel will be made if there is reason to believe that someone may have been radicalised or maybe at risk of radicalisation. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups, or slogans, of Isis, Al Shabab, Al Qaida or other terrorist groups);
- Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others
- Dehumanising people by using derogatory terms or other means.

Specific safeguarding issues of which staff should be aware are: a child missing from education, a child missing from home or care, child sexual exploitation (CSE), bullying including cyberbullying, hate, domestic violence, drugs, fabricated or induced illness, faith abuse, gangs and youth violence, gender based violence/violence against women and girls (VAWG), mental health, private fostering, sexting, relationship abuse and trafficking.

The trustees will ensure that there is an appropriate safeguarding response to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. The government's missing children and adult's strategy and the department's children missing education guidance will be used as points of reference in that regard.

### 3. ROLES AND RESPONSIBILITIES

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#### THE ROLE OF THE BOARD OF TRUSTEES

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The Trustees take seriously their responsibility under section 157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

- Trustee will have a senior board level (or equivalent) lead to take leadership responsibility for their school's or college's safeguarding arrangements (contact details for the lead trustee can be found in section 5 of this document).
- Trustees will ensure there are appropriate policies and procedures (in addition to this policy, policies for staff behaviour, whistleblowing, information sharing and risk management) in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- That all systems and processes should operate with the best interest of the child at their heart and ensure the child's wishes and feelings are taken into account when determining actions to take and what services to provide.
- To ensure that safer recruitment procedures are followed and that all appropriate checks are carried out on all staff.
- To ensure the school has a Designated Lead who is a member of the Senior Management Team and has undergone relevant training.
- To provide sufficient resources to enable appropriate training to all staff at regular intervals.
- To ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum and to ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- To ensure appropriate filters and appropriate monitoring systems are in place.
- To ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities set out in Part 1 of KCSIE 2018.
- To ensure that the Safeguarding Policy and procedures are consistent with Bromley Safeguarding Children Board (BSCB/Bromley safeguarding partnership arrangement) requirements and are reviewed annually.
- To ensure that the Principal and DSL work with local safeguarding partners as outlined by Bromley safeguarding partnership arrangements,
- To ensure that the school has procedures for dealing with allegations of abuse against members of staff that comply with BSCB/Bromley safeguarding partnership arrangements, Disclosure and Barring Service and the Teaching Regulation Agency.
- To ensure that school staff have due regard to data protection principles as outlined by the DPA and GDPR 2018.

The Trustees will ensure that the school contributes to inter-agency working in line with statutory guidance (Working together to safeguard children). This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. The school will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

The Trustee with particular responsibility for safeguarding is responsible for liaising with the DSL over all matters regarding safeguarding issues. The role is strategic rather than operational and he will not be involved in concerns about individual pupils. The Trustee with particular responsibility for Safeguarding will liaise with the DSL to produce a termly report for the Trustees. The Safeguarding Policy will be reviewed by the Trustees to ensure that all procedures have been discharged with efficiency and to ensure swift remediation of any deficiency in policy or procedures.

## THE ROLE OF THE PRINCIPAL

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- To understand procedures set out by the Bromley Safeguarding Children's Board and the role of the Designated Safeguarding Lead
- To ensure that the Safeguarding Policy and procedures are understood and implemented by all staff
- To ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding children
- To monitor the effectiveness of the policy and procedures and liaise with the designated safeguarding lead over amendments
- To ensure that the Designated safeguarding Lead receives sufficient support, training, time and resources to carry out his role effectively
- To ensure that all staff know and are alert to possible signs of abuse and know what to do if they have any concerns or suspicions
- To be aware of any off-roll notification should there be safeguarding concerns and to follow this up in conjunction with the Designated Safeguarding Lead and, if applicable, with the Bromley Safeguarding Children's board
- To create a safe environment and a caring ethos within the school
- To make parents aware of the school's Safeguarding Children Policy
- Ensuring the school effectively monitors, if any, children who have been identified as "at risk"
- Providing guidance to parents, children and staff about obtaining suitable help

## THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

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Trustee to ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. The DSL is to be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

### **Deputy designated safeguarding leads**

There will be at least one named deputy designated safeguarding lead. Any deputies must be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

## Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

## Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff. Training

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;

- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

### **Raise Awareness**

The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Trustees regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding partnership arrangements;
- Where children leave the school (or if appropriate before the child leaves school to support transition), the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- During term time the designated safeguarding lead (or a deputy) should always be available for staff in the school to discuss any safeguarding concerns.

Additionally, following a report of sexual violence, the designated safeguarding lead (or deputy) should make an immediate risk and needs assessment, considering the victim, the alleged perpetrator as well as all other children (and if appropriate adult students and staff).

Majeed Ullah is the Designated Safeguarding Lead. The Deputy Designated Safeguarding Lead is Ibrahim Teladia and Ridwanul Kareem Ahmed. All have attended/completes a Level 3 Child Protection Course. They are fully trained for this role in child protection by completing the Designated Safeguarding Lead training (provided by Bromley Safeguarding Children's Board). Majeed Ullah and Ibrahim Teladia have attended training in the following areas: Safeguarding, Channel Awareness, FGM, Safer recruitment, First Aid, and Fire Marshall training.

## THE ROLE OF THE STAFF

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All members of staff should be aware of the four key steps to follow to help identify and respond appropriately to possible abuse and/or neglect:

- Be alert – to be aware of signs of abuse and neglect and to understand the procedures set out in local multi-agency safeguarding arrangements
- Question behaviours – to be aware if something seems unusual and try to speak to the child alone, if appropriate to seek further information
- Ask for help – discuss concerns with the Designated Lead
- Refer – make a referral to the BSCB. This would usually be made by the Designated Lead but can be made by anyone. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- To be aware of the contents of the Safeguarding Children policy and procedures and the identity of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead
- To enquire from the DSL any matters that are not understood in Part 1 of KCSIE 2018
- To sign confirming that they have read and understood the safeguarding policy, staff code of conduct, behaviour policy and part 1 of keeping children safe in education (2018)
- To have a responsibility to provide a safe environment in which children can learn
- To set a good example by conducting themselves appropriately and maintaining suitable standards of conversation and interaction with and between pupils
- To be prepared to identify children who may benefit from early help, providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the designated safeguarding lead.
- To support other agencies and professionals in an early help assessment if required
- To be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- To follow the referral processes set out in KCSIE 2018 if there is a concern about a child's welfare.
- To help pupils understand how to keep themselves safe and manage risk through PSHCE discussions and through all aspects of school life
- To foster a culture of trust between adults who work at the school and children who attend
- To undertake regular updated (at least annually) training to provide them with relevant skills and knowledge to safeguard children effectively
- To know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.

- To identify children at risk of being drawn into terrorism and to challenge extremist ideas which can be used to legitimize terrorism and are shared by terrorist groups
- To build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views
- To be aware of the types of abuse and neglect so that they are able to identify cases of children who may need help or protection.
- To be alert of persistent absenteeism of any pupils and report concerns to the Designated Lead should it be felt there may be safeguarding concerns
- To be open, accepting and ready to listen to a pupil and to follow the procedures outlined in this policy in the event of a disclosure.
- To complete a concern form signed and dated
- All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse.
- All staff should recognise that children are capable of abusing their peers. All staff should be clear about the school's procedure with regard to peer on peer abuse.
- Members of staff are required to 'self-declare' if there are any changes to their own criminal record, have links with any extremist groups or if there is a change in their personal circumstances.

The Teachers' Standards state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible. The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

If, after a referral, the child's situation does not appear to be improving, the designated safeguarding lead (or the person who made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves. Local safeguarding partnership arrangements will have escalation procedures that can be followed.

All verbal communication should be written down at the earliest opportunity.

If early help is appropriate, the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

If in any doubt, staff are encouraged to always speak to the designated safeguarding lead (or deputy) who will provide relevant information, advice and guidance.

Note: All information and action taken, including the decision made will be fully documented and all referrals to Social Services will be accompanied by a standard referral form.

## 4. RESPONDING TO DISCLOSURES

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### DISCLOSURES

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Members of staff may suspect a case of abuse from a variety of sources:

- a pupil discloses to them personally
- from behaviour of, or marks on, the pupil (e.g. bruises, welts, lacerations, abrasions)
- indications through schoolwork
- a pupil informs them that they know or suspects that another pupil is being abused
- another third party informs them that they know or suspects that a pupil is being abused

If a pupil starts to disclose, the following procedures are essential:

**Reassure** the pupil has a right to tell and is not to blame. It is helpful to the pupil if the adult is able to communicate something of the following:

'You're not to blame, it's not your fault'

'You're very brave to have told someone'

**Confidentiality:** Do not promise confidentiality, explain that you have to make sure that the pupil is safe and may need to ask other adults to help you to do this. Referrals may have to be made in order to safeguard the pupil.

Ensure that any questions that need to be asked to clarify understanding are as open as possible and do not lead the pupil to tell you what she or he wants to and no more. The pupil may have to disclose to a specialist later and too much detail now may interfere with later investigations.

Keep any suspicions confidential and not discuss them with anyone other than those mentioned above

Make a written note of the discussion as soon as possible and at most within twenty-four hours to give to the Designated Lead. Note time, date, place, people present and what was said. Records should be precise; the notes may be needed in subsequent court proceedings. All notes should be signed.

**Listen carefully** and take the allegation seriously. When the pupil has finished, make sure that he feels secure; explain what you are going to do next.

**Report:** make notes, including the date and time of the interview and sign them. It is important to record as much as you can remember using the pupil's own words. Write facts and information only, taking care to avoid opinion. A specific safeguarding incident/concern form is an appendix to this policy. This should be delivered in person to the DSL's office and the DSL should be notified. Further copies are available from the DSL. Staff are not required to investigate further but may be required to support and monitor the student in the future.

**Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. The pupil should only be examined by an appropriate doctor.

**Refer:** Make a referral to the relevant children services (where allegations relate to incidents that have happened in the child's home, or home authority, a referral to that local authority children's services will be made; where any abuse takes place in the school or surrounding areas, the initial referral will be made to Bromley children's services.. This would usually be made by the Designated Safeguarding Lead but can be made by anyone. Normally, when there are safeguarding concerns, the Designated Lead will contact parents before making a referral to Children's Social Care Services. However, there are some exceptions; see below.

Physical injury, emotional abuse or neglect:

- The Designated Lead will contact Children's Social Care Services. If there has been a deliberate injury or where there are concerns about the child's safety, the child's parents should not be contacted before first consulting with social services
- Where emergency medical attention is necessary it will be sought immediately. The Designated Lead should inform the doctor of any suspicion of abuse
- If a referral is being made without the parent's knowledge and non-urgent medical treatment is required, social services should be informed. Otherwise, speak to the parent and suggest medical attention should be sought for the child.
- If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention should be requested.

Sexual abuse:

- The Designated Lead will contact Children's Social Care Services or Police
- The Designated Lead will not speak to the parents
- Under no circumstances should the Designated Lead, or any other member of the school, attempt to carry out any investigation into the allegations or suspicions of sexual abuse. The role of the Designated Lead is to collect the exact details of the allegations or suspicion and to provide this information to the child protection agencies
- The member of staff will not be approached at this stage unless it is necessary to ensure the immediate safety of children
- The DSL may need to clarify any information regarding the allegation; however, no person will be interviewed at this stage.

Within 24 hours the DSL will contact the children's services/MASH in accordance with the relevant local authority procedures to determine whether the referral is to take place. No member of the school staff shall conduct an investigation concerning child abuse. This will be done by Social Services and/or the police.

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## DEALING WITH ALLEGATIONS OF ABUSE AGAINST STAFF

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All members of staff at the School should have an understanding of Child Protection and Safeguarding issues and should appreciate the importance of their vigilance. The School has a Whistle blowing Policy which is readily available and is part of the induction process. Where an allegation or complaint is made against any member of staff or volunteer, the matter should be reported immediately to the Principal, or in his absence to the Chair of Trustees. Where appropriate, the Principal will consult with the DSL and the allegation will be discussed immediately with the LADO before further action is taken.

Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the Chair of Trustees, or in his absence the Safeguarding Trustee, without first notifying the Principal. Again, the allegation will be discussed immediately with the LADO before further action is taken.

In the event of any conflict of interest, the case will be escalated to the Chair of the Board of Trustees who will then follow the procedure accordingly.

Contact details for the Local Authority Designated Officer (LADO) for Bromley:

**Contact Name:** Ms Gemma Taylor

**Telephone:** 0208 461 7669

**Email:** [lado@bromley.gov.uk](mailto:lado@bromley.gov.uk) – [gemma.taylor@bromley.gov.uk](mailto:gemma.taylor@bromley.gov.uk)

If any allegation of abuse is made against a member of staff, the Bromley safeguarding partnership procedures will be followed and we shall have regard to the guidelines on practice and procedure given in Part 4 of the DfE statutory guidance Keeping Children Safe in Education (2018).

Allegations that might indicate that a person is unsuitable to continue to work with children are where a person has:

- behaved in a way that has harmed a pupil, or may have harmed a pupil
- possibly committed a criminal offence against or related to a child
- behaved towards a pupil or children in a way that indicates that he or she would pose a risk of harm if they work regularly or closely with children

The procedures for dealing with allegations need to be applied with common sense and judgement. It is essential that any allegation of abuse made against a member of staff is dealt with very quickly, in a fair and consistent way that provides effective protection for the pupil and at the same time supports the person who is the subject of the allegation.

The School understands its duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, However, where a strategy discussion is required, or police or children's social care services need to be involved, this will not happen until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. The individual will be advised that they may confide in a colleague or counselling etc. for support.

There will be a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. In the event that an employee is suspended, they will be kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, this will not happen until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will also be kept informed about the progress of the case and told the outcome where there is

not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information considered in reaching a decision cannot normally be disclosed, but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 163). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

In response to an allegation, all other options should be considered before suspending a member of staff: suspension should not be the default option and the DSL will seek advice from the LADO in this regard. An individual should be suspended only if there is no reasonable alternative. In cases where the school is made aware that the Secretary of State has made an interim prohibition order, it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency (TRA) investigation. If a suspension is deemed appropriate, the reasons and justification should be recorded by the employer and the individual notified of the reasons. There will also be a record made of what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details and offered the necessary support.

When a complaint is made against a member of the boarding staff who lives within a boarding house, an alternative arrangement will be made for them to live elsewhere during the investigation process, and alongside this alternative arrangement will be made for staffing the boarding house.

Any employee who becomes aware of a possible allegation or concern of a child protection nature must take immediate steps to ensure that the matter is reported to the Designated Safeguarding Lead or in his absence to the Deputy Safeguarding Lead. It is important that the member of staff reporting the concern acts quickly. An investigation may be impeded if a concern is reported late.

Many cases may well not warrant the consideration of either a police investigation or enquiries by the local authority. In these cases, local arrangements should be followed to resolve cases without delay. However, some rare allegations will be so serious they require immediate intervention by the local authority, in which case the following guidelines are followed:

- The DSL should consult the local authority Safeguarding Children Referral and obtain written details of the allegation, signed and dated, from the person who received the allegation (not the pupil).
- The DSL should record any information about dates, times, locations and names of potential witnesses.
- An initial assessment of an allegation should be made by the duty officer and the DSL to judge whether there is a need for immediate action to protect the pupil, the allegation is demonstrably false, there has been inappropriate behaviour or poor practice that can be dealt with through the school's disciplinary procedures.

- Where a referral is made because the pupil has suffered or is likely to suffer significant harm or the alleged abuse is a criminal offence, the local authority procedures will be followed. The local authority will be informed of all allegations and be invited to discuss the allegation with the DSL to confirm details and the best way of informing parents (if they are not already aware).
- The DSL will inform the alleged about the allegation after consulting the LADO
- If the allegation is not false or unfounded and there is cause to suspect a pupil is suffering, or likely to suffer significant harm, a strategy meeting will be convened
- The LADO may hold meetings with other agencies e.g. the police, if it is judged that the threshold of significant harm has not been reached.
- The DSL will make the decision whether or not to suspend, given the risk to the pupil and where the allegations warrant investigation by police.
- Staff are permitted to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour. This should be considered if the allegation is about physical contact.
- In cases where other interagency involvement is not required, the LADO will discuss with the DSL what steps to take. The DSL may decide to take no further action, to dismiss the person or not to use that person's services in the future.
- Where further investigations are required before deciding how to proceed, the DSL will decide, with the LADO, who will investigate; this may be an independent investigator provided by the Local Authority.
- Outcomes of allegations against members of staff may be defined as Substantiated, False, Malicious, Unfounded or Unsubstantiated.
- If an allegation is not substantiated and the person returns to work, the school will support that person through offering, for example, a phased return or a mentor.

Allegations that are found to be malicious should be removed from personnel records; and any that are unsubstantiated, are unfounded, or malicious should not be referred to in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference

For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, will be kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The record will be retained as per the school's data retention policy.

If an allegation is shown to be deliberately invented or malicious the principal should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they will be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the school to deal with it, although if there are concerns about child protection, the DSL will discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the school will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing will be held within 15 working days.

'Settlement agreements' will not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

There will be three possible types of investigation:

1. By Social Services and the Police under Section 47 of the Children Act 1989
2. By the Police under criminal law
3. By the School in line with staff disciplinary procedures

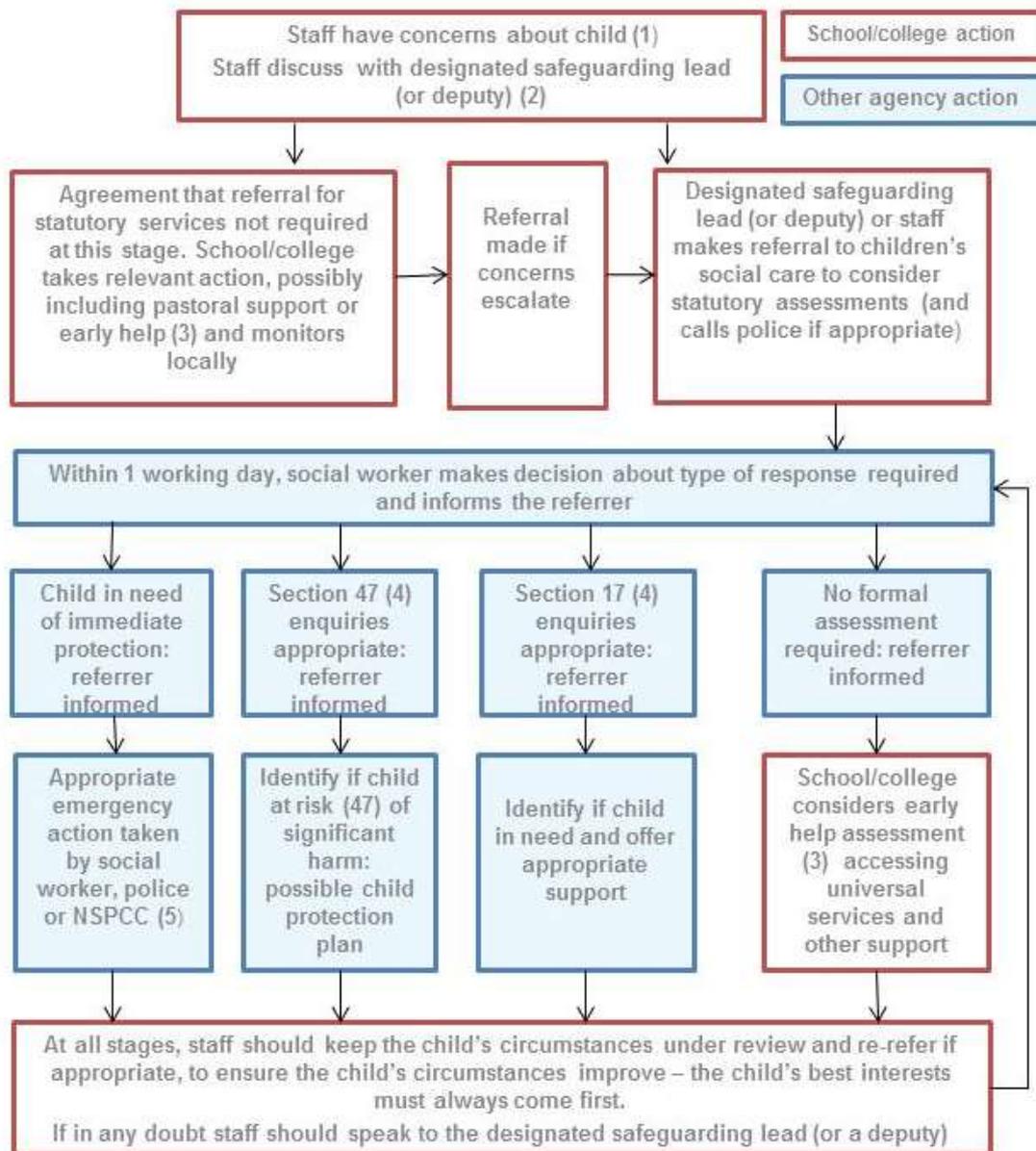
The Local Authority is responsible for managing child protection issues and any allegations against a member of staff must be reported immediately to the Local Authority Designated Officer. This initial consultation will determine whether the allegation reaches the threshold of significant harm to justify a referral to Social Services. In cases of serious harm, the police will be informed from the outset.

If the consultation discussion determines that the allegation does meet the criteria for referral to social services as a child protection concern, the Local Authority Designated Officer will provide support to the school in making the referral and throughout the subsequent process as required. Then the LADO will discuss with the school whether to report to the Disclosure and Barring Service (DBS) at the earliest opportunity of leaving the school, any person whose services are no longer used because he or she is considered unsuitable to work with children. The school will also consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and where a prohibition order may be deemed appropriate.

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. (KCSIE 2019)

Should it be determined in the consultation discussion that the Allegation does not meet the threshold for a child protection referral to social services, then the Local Authority Designated Officer will advise on further action that may be taken by the school in investigating the matter internally in line with the staff disciplinary procedures.

ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD



HEAD DESIGNATED SAFEGUARDING LEAD (DSL)	MR MAJEED ULLAH TELEPHONE: 020 8092 9262
DEPUTY DESIGNATED SAFEGUARDING LEAD	MR IBRAHIM TELADIA TELEPHONE: 020 8092 9265
DESIGNATED SAFEGUARDING TRUSTEE	MR ABDUL AZIZ GHIWALA TELEPHONE: 07837 480 534
LOCAL AUTHORITY DESIGNATED OFFICER	MS GEMMA TAYLOR TELEPHONE: 0208 461 7669

## 5. USEFUL CONTACTS

<b>Immediate Threat</b>	
Telephone	999
<b>Serious Concerns</b>	
Telephone	101
<b>Prevent</b>	
Contact DfE helpline for non-emergency advice	0207 340 7264
Email	Counter-extremism@education.gsi.gov.uk
<b>Bromley Common Assessment Framework Team</b>	
Telephone	0208 461 7174
Address	Bromley Central Library, High Street, Bromley, BR1 1EX
<b>Bromley Multi-Agency Safeguarding Hub (MASH)</b>	
Telephone	0208 461 7379 / 7026 / 7373 / 7309
Email	mash@bromley.gov.uk
Address	1st Floor St Blaise Building, Civic Centre, Stockwell Close, Bromley, BR1 3UH
<b>Female Genital Mutilation (FGM)</b>	
FGM Helpline Contact	0800 028 3550
Email	fgmhelp@nspcc.org.uk
<b>Chair of Trustees</b>	0208 295 0637
<b>Darul Uloom School Safeguarding Team</b>	
Trustee with lead responsibility for safeguarding	Mr Abdul Aziz Ghiwala
Mobile	07837 480 534
Email	Abdul.aziz@darululoomlondon.com
Designated Safeguarding Lead	Mr Majeed Ullah
Telephone	020 8092 9262
Mobile	0795 040 5604
Email	safeguarding@darululoomlondon.com
Deputy Designated Safeguarding Lead	Mr Ibrahim Teladia
Telephone	020 8092 9265
<b>Local Authority Designated Officer</b>	
Contact – Team Manager	Ms Gemma Taylor
Telephone	0208 461 7669
Email	<a href="mailto:lado@bromley.gov.uk">lado@bromley.gov.uk</a> – <a href="mailto:gemma.taylor@bromley.gov.uk">gemma.taylor@bromley.gov.uk</a>



# DARUL ULOOM LONDON

## SAFEGUARDING INCIDENT/CONCERN FORM

Pupil/Child Name	Date of Birth (if not know, please put child's age or year group)
Name and position of individual completing form	
Date of incident/concern	
Details of incident. Please include as much information as possible, including who, what, where and when.	
Any other relevant information such as witnesses, or any immediate action taken	
Signature of individual completing this form:	Date and time form completed:
Would you like feedback about your concern? (Yes or No)	
Signature of DSL	Date and Time form received by DSL

PLEASE CONTINUE ON A SEPARATE SHEET IF NECESSARY. ONCE COMPLETE, PLEASE SUBMIT THIS FORM TO MAJEED ULLAH (DSL) OR IN HIS ABSENCE MOULANA IBRAHIM TELADIA (DEPUTY DSL) OR RIDHWANUL AHMED (DEPUTY DSL).

## POLICY REVIEWED BY

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Mr Abdul Aziz Ghiwala (Safeguarding Trustee)

Reviewed on

Sign:

Mr Majeed Ullah (Designated Safeguarding Lead)

Reviewed on Monday, 17<sup>th</sup> February 2020

Sign:

Moulana Ibrahim Teladia

Reviewed on Monday, 17<sup>th</sup> February 2020

Sign: