September 2026 to September 2027

Sacred Heart
Catholic Primary School

Learning in Love

Child Protection and Safeguarding Policy 2026-27

Date of last review	Autumn 2026
Date of next review	Autumn 2027
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Owner of Document	Sarah Norville

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Important Safeguarding Contacts within Sacred Heart Catholic Primary School

Organisation / Role	Name	Contact details
Head	Sarah Norville	c/o School Office 020 89420215 head@sacredheart.merton.sch.uk
Designated Safeguarding Lead (DSL)	Sarah Norville	c/o School Office 020 89420215 head@sacredheart.merton.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	Siobhan Heffron	sheffron@sacredheart.merton.sch.uk Monday to Thursday (Maternity leave from Oct 2026)
Deputy Designated Safeguarding Lead (DDSL) Please add boxes for all additional deputy DSLs	Tanya Bastian	tbastian@sacredheart.merton.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	Bryan Connell	bconnell@sacredheart.merton.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	Yolande Harris	yharris@sacredheart.merton.sch.uk Monday, Tuesday, Thursday, Friday (term-time only)
Deputy Designated Safeguarding Lead (DDSL)	Tracy Minns	tminns@sacredheart.merton.sch.uk (48 week nursery)
Designated Teacher for Children in Care (DT for Children in Care)	Sarah Norville	c/o School Office 020 89420215 head@sacredheart.merton.sch.uk
Special Educational Needs Coordinator (SENDCO)	Diana James	send@sacredheart.merton.sch.uk
Mental Health Lead	Siobhan Murtagh	smurtagh@sacredheart.merton.sch.uk
DSL Prevent Lead	Sarah Norville	c/o School Office 020 89420215 head@sacredheart.merton.sch.uk
Chair of Governors	Tristan Eley	teley.governor@sacredheart.merton.sch.uk

Organisation / Role	Name	Contact details
Vice Chair of Governors	Patrick Brien	pbrien.governor@sacredheart.merton.sch.uk
Link Safeguarding Governor	Mel Giltrow	mgiltrow.governor@sacredheart.merton.sch.uk
Data Protection Officer	School Pro	dpo@schoolpro.uk 01452 947633

Contacts (External to Sacred Heart)

Organisation / Role	Name	Contact details
Merton Safeguarding Children Partnership (MertonSCP)		Email: Home - Merton Safeguarding Children Partnership
Merton Local Authority Children and Families Hub (previously MASH)	C and F Hub	Tel: Monday to Friday 9am to 5pm 020 8545 4226 / 4227 Email:candfhub@merton.gov.uk **OUT OF HOURS**: Children's Emergency Duty Team 020 8770 5000 **Request for a Service**
Merton Local Authority Designated Officer (LADO) Merton LADO (part-time)	John Shelley Christine Dyson	Tel: 0208 545 3187 Email Lado Referral: lado@merton.gov.uk or securely: lado@merton.gov.uk.cjsm.net.
Merton Local Authority Early Years, Family Wellbeing and Early Help Service		Tel: 020 8274 5300 Email: FSD@merton.gov.uk
Merton Education Welfare Service		Tel 020 8545 4021 Email: education.welfare@merton.gov.uk
Merton Local Authority Lead for Previously / Looked After Children		Head of Service Rosemary Frimpong
Merton Local Authority Lead for Young Carers		Carers First
Merton Local Authority Lead for Homelessness (16+)		Team Manager, Family Assessment and Intervention Service Laura Darlington Wendy Tomlinson Service Manager
Merton Local Authority Hate Crime and Prevent Lead		**safer.merton@merton.gov.uk**
Prevent Prevent referrals Parent guidance		Making a Referral to Prevent DFE National Prevent Referral Form

Organisation / Role	Name	Contact details
Advice line for members of the public Channel helpline		Parents' Booklet (educateagainsthate.com) ACT Early | Prevent radicalisation 0800 011 3764 020 7340 7264
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
The Lucy Faithful Foundation: Shore Space:		Stop It Now helpline: Tel: 0808 1000 900 Email: contactus.stopitnow.org.uk
Police	N/A	Emergency 999 Non-emergency 101 Find out how to contact your neighbourhood team

1.What to do if you are concerned about a child

Every member of staff including volunteers working with children at our school are advised to maintain an attitude of *'**it could happen here'*** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outline in this policy.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately[1] to the DSL or, if unavailable, to the DDSL, or alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child or young person should be reported without delay and recorded in writing in line with the schools procedure.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.
- who recorded the incident including date and time.

Report to DSL

Following receipt of any information raising concerns, the DSL will consider what action to take which could include completing the Request for Service form or seeking advice from Merton Children and Families Hub: candfhub@merton.gov.uk. All information and actions taken, including the reasons for any decisions made, will be fully documented.

Referral Process and Contact Details:
Discuss: If we are unsure what support or services may be available or would like to discuss a possible request for service we will contact the Merton Children and Families Hub for a consultation by calling 020 8545 4226 / 4227. The advice of the social worker will be followed and this may include completing a Request for Service Form
Consult: Where there is a concern/s and we wish to seek advice and guidance we will contact the Merton Children and Families Hub for consultation: candfhub@merton.gov.uk. The advice of the social worker will be followed, and this may include completing a Request for Service Form

Refer: Where the referral is urgent, we will call on 020 8545 4226 / 4227 and ask to speak to a social worker. The advice of the social worker will be followed and this may then include completing a Request for Service Form in a timely manner. In some situations, we may not be able to call the social worker and may complete a Request for Service Form in the first instance. However on most occasions we will endeavour to call and discuss the concern before submitting a request for service form.

[1] Where a member of staff maybe teaching and is required to report a serious concern, the school should be clear in their reporting mechanisms. In most cases the staff will be expected to request cover.

Children and Family's Hub: (C and F Hub)

The Hub is open between 9am and 5pm Monday to Friday. (Working Days Only)

020 8545 4226 / 4227

Referrals received outside of those hours will not be considered until the next working day.

Children and Family's Hub:

The out of hours team should be contacted on 020 8770 5000, (outside of core working hours).

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the local authority immediately. Anybody can make a referral in these circumstances.

Request for Service Form

If you think a child is in immediate danger or in a life-threatening situation you should call the police on 999.

The local authority where the child resides will be the local authority that is contacted. If you are unsure this website can be helpful **Find your local council**

All referrals will be made in line with Merton Safeguarding Children Partnership procedures as outlined in **Diagram 1 Flowchart** and where Sacred Heart have made a referral and no further information is received, Sacred Heart take responsibility to make any follow ups and request information. Sacred Heart will do this by telephone and keep records up to date.

Sacred Heart will follow MertonSCP Escalation Policy when we believe the request for service we made should be re-viewed and this may include further inquiries/assessment. The Escalation Policy will be utilised **immediately** after receiving an outcome of the school's request for service.

Sacred Heart Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with the local authority if:

- the situation is an emergency and the designated senior person, their alternate and the Headteacher are all unavailable.
- they are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Headteacher or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact the local authority directly with their concerns and discuss a request for service.

1. Aims

This policy document provides the basis for good practice within Sacred Heart for safeguarding and protecting children and young people. Sacred Heart aims to ensure that:

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

Sacred Heart's Safeguarding and Child Protection Policy applies to all adults working in or on behalf of Sacred Heart and is an overarching document which demonstrates how everyone working in school, shares an objective to help keep young people safe from harm and abuse. We are committed to safeguarding and promoting the welfare of all of our pupils and will always take a considered and sensitive approach in order to support all pupils and we recognise that the safety and welfare of each pupil is of paramount importance.

We aim to ensure that:

- young people within our school feel safe at all times.
- our ethos promotes high levels of self-confidence and self-esteem in all of our pupils.
- all members of our school community are safe and are able to put the welfare of pupils first without concern that there will be any negative consequences attached to their actions.
- we promote and nurture positive relationships between all members of the Sacred Heart community.
- all adults who have contact with young people in school have been properly vetted and cleared as suitable to work and support young people in our care.
- all adults who have contact with young people in school have been trained to undertake their safeguarding responsibilities effectively.

When a safeguarding issue arises, staff of Sacred Heart will work in accordance with the principles outlined in the Merton Safeguarding Children Partnership (MSCP) Effective Support for Families guidance / framework these include:

- Child-centred: the child's welfare should be kept sharply in focus in all work with the child and family. The child should be spoken and listened to, and their wishes and feelings ascertained, considered (having regard to their age and understanding) and recorded when making decisions about the provision of services.
- Rooted in child development: those working with children should have a detailed understanding of child development, trauma, systemic practice and how the quality of the care received by a child can have an impact on their health and development.

1 Focused on outcomes for children: the purpose of all interventions should be to achieve the best possible outcomes for each child recognising each is unique. These outcomes should contribute to the key outcomes set out for all children set out in the Children Act 2004.

  - Stay safe / Be healthy / Enjoy and achieve / Make a positive contribution / Achieve economic wellbeing

  Children's Wellbeing and Schools Act 2026 goes further to ensure:

  - Improved Visibility and Safeguarding / Enhanced Support for Children in Care / Better School Readiness and Equity / Digital Safety and Wellbeing and robust Workforce and provider oversight
  - Holistic in approach: having an understanding of a child within the context of the child's family (parents or carers / the wider family) & of the educational setting, community and culture in which they are growing up.

- Ensuring equality of opportunity: all children should have the opportunity to achieve the best possible developmental outcomes, regardless of their gender, ability, race, ethnicity, sexuality, circumstances or age. Some vulnerable children may have been particularly disadvantaged in their access to important opportunities, and their health and educational needs will require particular attention in order to optimise their current welfare as well as their long-term outcomes into adulthood.

- Involving of children and families: it is important to listen to the child, develop a therapeutic relationship with the child and through this gain an understanding of his or her wishes and feelings.

- The importance of developing a co-operative working relationship is emphasised, so that parents or carers feel respected and informed, they believe agency staff are being open and honest with them, and in turn they are confident about providing vital information about their child, themselves and their circumstances.
- Building on strengths as well as identifying difficulties: identifying both strengths and difficulties within the child, his or her family and the context in which they are living is important, as is considering how these factors are having an impact on the child's health and development.
- Integrated in approach: multi and inter-agency work to safeguard and promote children's welfare starts as soon as it has been identified that the child or the family members have additional needs
- A continuing process not an event: understanding what is happening to a vulnerable child within the context of his or her family and the local community, and taking appropriate action are continuing and interactive processes and not just single events.
- Providing and reviewing services: action and services should be provided according to the identified needs of the child and family. The impact of service provision on a child's developmental progress should be reviewed at regular intervals.
- Informed by evidence: effective practice with children and families requires sound professional judgements which are underpinned by rigorous evidence and draw on the practitioners' knowledge and experience. Decisions based on these judgements should be kept under review.

The policy is available publicly for the school community via Sacred Heart's website. Parents and carers are informed that safeguarding concerns may result in referrals to external agencies, in line with statutory duties and Sacred Heart's commitment to promoting the welfare of every child.

2. Legislation and Statutory Guidance

The policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026) and Children's Wellbeing and Schools Act 2026 to comply with current guidance and the arrangements.

This policy is also based on the following legislation:

- School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- The Children Act 1989 (and 2004 amendment), and the Children's Well-being and Schools Act (2026) which provides a framework for the care and protection of young people.
- 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, (2020) which outlines when people with criminal convictions can work with young people.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to young people.
- Statutory guidance on the Prevent duty 2023, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- Crime and Policing Act 2026 to recruit safely and tackle the epidemic of serious violence and violence against women and girls.

Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make the necessary arrangements for ensuring that their functions relating to the conduct of Sacred Heart are exercised with a view to safeguarding and promoting the welfare of children who are pupils at Sacred Heart. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

Under Section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to co-operate with the local authority to improve the wellbeing of children in the local authority area.

Under Section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school or further education institution to supply information in order to perform its functions. This must be complied with.

All procedures can be found on the Merton Safeguarding Children Partnership website.

2.1 Human Rights Act 1998, Equality Act 2010 and the Public Sector Equality Duty

Sacred Heart recognises that safeguarding is intrinsically linked to upholding the rights and freedoms of all children. We acknowledge our legal obligations under:

2.1.1 Human Rights Act 1998 (HRA)

We understand that it is unlawful for any public authority, including a school, to act in a way that is incompatible with the rights set out in the European Convention on Human Rights. Children have, for example:

- The right to education (Protocol 1, Article 2)
- The right to be free from degrading treatment (Article 3)
- The right to respect for private and family life (Article 8)
- Our safeguarding and child protection procedures aim to ensure that no child in our care is subject to inhuman or degrading treatment, and that their right to be heard and respected is fully upheld.

2.1.2 Equality Act 2010

We are committed to protecting children from unlawful discrimination, harassment and victimisation on the basis of any protected characteristic (including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

We will monitor and address any behaviour, whether staff-to-child or child-on-child, that could amount to discrimination, bullying or harassment (including prejudice-based and discriminatory bullying).

Where there is evidence that certain groups (e.g. girls, pupils from a particular ethnic group, or LGBTQ+ pupils) may be disproportionately subject to harassment or abuse, we will take proportionate measures (so-called "positive action") to mitigate potential harm and meet pupils' specific needs.

2.1.3 Public Sector Equality Duty (PSED)

We acknowledge our legal obligation to have due regard to:

- Eliminating discrimination, harassment, and victimisation.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.
  - Recognise that safeguarding issues such as sexual violence, racist incidents or homophobic and transphobic bullying can be closely linked to discriminatory attitudes. To protect pupils effectively, staff will proactively track patterns of behaviour and will intervene early to challenge any form of discrimination or abuse.

2.1.4 Implementing These Duties

- **Whole-School Culture:** We integrate human rights and equality principles throughout our safeguarding training, policies and day-to-day practice, ensuring staff are aware of their duties and consistently model inclusive and respectful conduct. At Sacred Heart we are committed to safeguarding and promoting the welfare of all children and young people. We recognise that safeguarding is everyone's responsibility and that children have the right to be protected from harm, abuse, neglect, exploitation, and violence. We recognise that every child has unique needs and circumstances and should be supported to achieve the best possible outcomes. We regularly review concerns and share information to ensure children remain safe and supported. Our safeguarding team maintains a clear understanding of Merton local authority safeguarding procedures, thresholds and pathways for support. When assessing concerns and identifying support for children and families, we use the Merton Safeguarding Children Partnership (MSCP) Effective Support for Families guidance / framework
- **Policy Monitoring:** routinely review policy and related procedures (e.g., Anti-Bullying, Behaviour, Code of Conduct) to ensure they promote and uphold the rights of all children, irrespective of their background or characteristics.
- **Record-Keeping and Data:** monitor and evaluate safeguarding incidents and patterns in a relevant and proportionate way (e.g. bullying or harassment cases). Considering protected characteristic in order to identify emerging concerns and evidence-based solutions.
- **Listening to Children**: value the voice of the child and ensure mechanisms for pupils to report concerns are robust, visible, readily accessible and well publicised. Take any report seriously and respond in a timely, child-centred way.

By embedding statutory obligations into the school's safeguarding framework, we can demonstrate a strong commitment to ensuring that no child is disadvantaged, harassed or denied the ability to thrive and learn in a secure, respectful environment.

3. Definitions

Safeguarding and promoting the welfare of young people means:

- Protecting young people from maltreatment
- Preventing impairment of young people's mental and physical health or development
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge

Working Together to Safeguard Children further extends this definition to include:
Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

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

Abuse is a form of maltreatment of a young person and may involve inflicting harm or failing to act to prevent harm. **Appendix 1** explains the different types of abuse in more detail.

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

In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEN it is up to 25 years of age.

Sacred Heart is based within the London borough in Merton and Sacred Heart works in line with Merton Safeguarding Children procedures. The Merton Safeguarding Children Partnership* is made up of three statutory partners; the local authority, Southwest London Integrated Care Board and the Metropolitan Police. As an education establishment, we will meet our statutory requirements to reduce the likelihood of any risk of harm to children and work in partnership with MertonSCP to create effective support for children and families

4. Equality Statement

Some young people have an increased risk of abuse, and additional barriers can exist for some young people with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise young people's diverse circumstances, to ensure that all young people have the same protection, regardless of any barriers they may face.

As part of our commitment to safeguarding, we will '*treat children as children*'. This means we do not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

This includes challenging the conception of adultification. Adultification is a concept describing when children are not afforded notions of innocence and vulnerability and are put at risk by those who do so. Adultification is always founded within discrimination and bias. SCHOOL NAME will follow any guidance provided Merton Safeguarding Children Partnership (Independent Scrutiny) to prevent the adultification of children in our setting and within the borough of Merton

Giving special consideration to young people who:

- Have special educational needs (SEN) or disabilities (see section 9)
- 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 currently or previously have been allocated a social worker

5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in Sacred Heart and is consistent with the procedures of the Merton Safeguarding Children Partnership.

The policy and procedures also apply to extended school and off-site activities.

The curriculum is designed so that safety issues within each subject are discussed and safe practices explained, such as using equipment properly in PE, Science and Design and Technology. Appropriate staffing levels will be maintained at all times when the curriculum is being delivered outside of Sacred Heart site. Appropriate and agreed pupil/adult ratios are always maintained. The visit leader always undertakes a risk assessment for any visits or trips to ensure pupils are safeguarded and protected from harm before the event is finally authorised by the Headteacher / Principal, who is advised by Sacred Heart Educational Visits Co-ordinator.

Visiting speakers, with correct clearance and/or constant supervision are always welcome into school so that they can impart specialist knowledge to the pupils.

5.1 All Staff

All staff will read and understand part 1 in full the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2026, and review this guidance at least annually.

All staff will be aware of:

- 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 for learning policy and the safeguarding response to young people who go missing from education.
- The Early Help process 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 young person tells them they are being abused or neglected, including specific issues 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), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

Section 7 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team. The DSL at Sacred Heart is Sarah Norville**.** The DSL takes lead responsibility for child protection, online safety and wider safeguarding.

- Robust cover arrangements for when the DSL is unavailable are in place (for example a confidential shared mailbox to make sure safeguarding concerned are received, monitored and acted on without delay)

- When the DSL is absent, the deputies Siobhan Heffron, Tanya Bastian, Bryan Connell and Yolande Harris – will act as cover. The Deputy DSLs are trained to the same level as the DSL. Further details of DSL role can be found here (Annex B KCSIE)

If the DSL and deputies are not available, concerns should be reported to any other member of the senior leadership team (SLT). In the exceptionally rare circumstance that no member of SLT is available, advice should be sought by phoning the C and F Hub

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 young people.

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Prevent/ Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Ensure that employees and governors are aware of, understand and can discharge their role and responsibilities under this policy.
- Attend any applicable training.

The DSL will also keep the Headteacher / Principal informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The DSL will also help to promote positive educational outcomes by sharing with staff information about welfare, safeguarding and child protection issues that young people (including those with a social worker) are experiencing or have experienced. This will include ensuring staff know who these young people are, understand the barriers to learning which they may face, maintain high expectations and offer appropriate support and adjustments. The full responsibilities of the DSL and deputies are set out in their job description.

The DSL is responsible for the oversight and analysis of safeguarding records (e.g. through electronic records system) to identify patterns and inform strategy.

The DSL is responsible for overseeing mental health concerns that constitute safeguarding issues, ensuring timely referrals and coordination with services such as CAMHS, mental health support team's (MHST). counselling, or other pathways through Health services and CandF Hub. All staff should be aware that mental health issues can be both a cause and symptom of abuse, neglect or exploitation.

In line with Merton Safeguarding Children Partnership[2] guidance, the DSL can access regular safeguarding supervision to support reflective practice and sound decision-making in complex cases. Opportunities for supervision and debriefing will also be provided for staff working directly with children on child protection, child in need or Family Help plans, recognising the emotional impact and complexity of safeguarding on all members of staff and on DSLs.

5.3 Governing Body

The Governing Body will approve this policy at each review; ensure it complies with the law and hold the Headteacher / Principal to account for its implementation.

The Governing Body will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full Governing Body.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher / Principal, where appropriate (see Appendix 3).

The Governors shall ensure that children are taught about how to keep themselves and others safe against online and offline threats. This includes ensuring that any children with additional needs have tailored provision.

The Governors will understand the local criteria for action and assessment and ensure that these are reflected in policies and procedures.

Safeguarding is reviewed annually by the Governing Body, including filtering and monitoring systems, training completion, and recruitment practices. Records of these reviews will be kept and governors will read Keeping Children Safe in Education 2026. **Section 12 has information on how governors are supported to fulfil their role.**

5.4 Headteacher / Principal

The Headteacher / Principal 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.
- Communicating this policy to parents when their child joins Sacred Heart and via Sacred Heart's website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3).

[2] Note: currently reviewing a model of delivery for supervision

5.5 Site Security

Sacred Heart aims to provide a secure school site but recognises that the site is only as secure as the people who use it. Therefore, all people on the site must adhere to the rules, which govern it. It is recognised that laxity can cause potential problems in safeguarding. Therefore, Sacred Heart ensures that:

- Gates are locked at 08.30 and will be unlocked at 15.45 for ten minutes, and then locked again.
- Duty staff ensure that no unauthorised persons enter Sacred Heart site.
- Doors are kept closed/locked to prevent intrusion.
- Visitors and staff may drive on Sacred Heart site only outside of lesson changeovers.
- Visitors only enter through the main entrance. They must sign in at reception and be reminded to wear their visitor badge while on site.
- Pupils are only allowed home with adults/carers with parental responsibility or when confirmed permission has been received in advance.
- Should a young person leave Sacred Heart premises without permission then staff must inform the DSL and Sacred Heart attendance officer via email **immediately**. Parents and police will then be informed, as set out in the missing child procedure, outlined in Appendix 4.
- There are robust procedures for lockdown and fire evacuation.

5.6 Screening

The Headteacher / Principal and/or authorised employee have the statutory power to search a pupil/s or his/her possessions, without consent, where they have reasonable grounds for suspecting that a pupil/s may have prohibited items. The Headteacher / Principal, School and/or authorised employee may also use reasonable force to carry out a search when required. Full details of prohibited items and Sacred Heart's procedures can be found in Sacred Heart's Behaviour policy.

5.7 Behaviour and Use of Reasonable Force

Sacred Heart's approach to behaviour management is underpinned by principles of dignity, compassion and fairness, with the aim of promoting positive relationships and de-escalating conflict wherever possible. Sacred Heart follows updated DfE guidance Restrictive interventions, including the use of reasonable force in schools.

In exceptional circumstances, staff may need to use reasonable force to prevent a pupil from:

- Hurting themselves or others
- Causing significant damage to property
- Seriously disrupting the learning or safety of others

Reasonable force refers to 'using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances'. It can include a range of actions, such as:

- Physically interposing between pupils
- Standing in the way of a pupil
- Leading a pupil by the arm away from a situation
- In extreme cases, holding a pupil to prevent harm

Key principles:

- Any use of force must be proportionate to the risk presented and be in the best interests of the child.
- Staff must always try to use de-escalation strategies first.
- Force must never be used as a punishment.

Staff may use reasonable force to prevent pupils from harming themselves or others, from damaging property or from causing disorder. This should always be a last resort, used proportionately, and in line with statutory guidance from the DfE and local authority protocols. Any use of reasonable force must take account of individual pupil needs, particularly for those with SEND or a history of trauma. Staff should refer to Sacred Heart's Behaviour Policy and Restrictive Interventions Policy for further guidance. Incidents involving reasonable force must be recorded and reported to the DSL, and parents should be informed as soon as reasonably possible.

5.7.1 Additional Considerations for Vulnerable Pupils

Sacred Heart recognises that the use of physical intervention may pose particular risks for pupils with:

- SEND or medical needs (including sensory or physical difficulties and allergy conditions[3])
- Communication challenges or trauma histories, and
- Mental health needs or emotional regulation difficulties.

In line with Keeping Children Safe in Education 2026, staff must take extra care when considering the use of force with these pupils. Reasonable adjustments must be made to reflect pupils' individual needs and vulnerabilities. For pupils with EHCPs, medical plans, or behaviour support plans, staff will follow bespoke strategies for crisis management and regulation, and in line with supporting pupils at school with medical conditions.

Bruising in non-mobile children

Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.

If our school/college is concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the Merton Safeguarding Children Board Multi-Agency Guidance on Bruising in Non Independently Mobile Infants and Children[4] In summary, these procedures state:

If a child appears seriously ill or injured, emergency treatment should be sought through an Emergency Department (ED) and C and F Hub should be notified of the concern and the child's location.

In all other cases:

- Staff must inform the DSL immediately and describe and document accurately on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
- Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.
- If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to CandF Hub, who have responsibility for arranging further multi-agency assessments.
- If there are concerns regarding the immediate safety of the child or staff, the police will be called.
- If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the C and F Hub.

6. Confidentiality

Sacred Heart's Data Privacy policy is available as a separate document and outlines how personal data may be shared. In respect of safeguarding, it is important to recognise that:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of young people.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping young people safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it

[3] **Benedict's Law Training: Allergy Awareness in Schools**

Every school in England has a legal duty to keep pupils with allergies safe, known as Benedict's Law, part of the Children's Wellbeing and Schools Act 2026. As a school we complete the mandatory Allergy safety training annually and everyone working in school name is trained in allergy safety, it's not just our first aiders or medical staff. School Staff are kept up to date via resources from Anaphylaxis UK and training from **NAME SERVICE**

[4] Bruising-Guidance-Final-1-1.pdf: Currently Under Review for all updates contact MertonSCP

is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a young person at risk.
- Staff should never promise a young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests.
- The government's information sharing advice for safeguarding practitioners includes rules for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 11, and allegations of abuse against staff in Appendix 3.

6.1 Use of Images

At Sacred Heart we will:
- **seek pupils' consent and parental consent for photographs to be taken or published** (for example, on our website, X or Instagram accounts, or in newspapers or publications, for teaching and learning purposes, or for posterity)
- use only the pupil's first name with an image
- ensure that pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- ensure that pupils do not take photographs or video images of other students without their express permission and the permission of a member of staff.

There is a policy for remote learning that demonstrates on understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely.

7. Recognising Abuse and Taking Action

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

7.1 Significant Harm

If a young person is suffering or likely to suffer significant harm, or is in immediate danger, tell the DSL, or the deputy DSL if the DSL is not available, who will make a referral to children's social care and/or the police **immediately**. Anyone can make a referral.

The DSL will make a referral through telephoning the **Merton Children and Family's Hub (CandF Hub)**.

Children and Family's Hub: Request for Service Form

The Hub is open between 9am and 5pm Monday to Friday. (Working Days Only)

020 8545 4226 / 4227

Referrals received outside of those hours will not be considered until the next working day.

Children and Family's Hub:

The out of hours team should be contacted on 020 8770 5000, (outside of core working hours).

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the local authority immediately. Anybody can make a referral in these circumstances.

If you think a child is in immediate danger or in a life-threatening situation you should call the police on 999

7.2 Dealing with Disclosures

If a young person 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.
- Understand that it must be hard for young person to disclose this to you and seek to build their trust.
- Stay calm and do not show that you are shocked or upset.
- Tell the young person they have done the right thing in telling you.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep the information a secret or to yourself.
- Safeguarding issues can manifest themselves via child-on-child abuse. This may include but not limited to: bullying (including cyber bullying), gender-based violence, teenage relationship abuse, sexual harassment,

sexual violence and assaults, harmful sexual behaviours and sexting. Staff should recognise that young people can abuse their peers and family members.
- Write up your conversation as soon as possible in the young person's own words and record in full. Stick to the facts, and do not record your own judgments.
- Once recorded on My Concern, check the date and time fields are accurate, and assign the incident to the DSL only. Alternatively, if appropriate, make a referral to young children's social care and/or the police directly (see Section 7.1) and tell the DSL as soon as possible that you have done so.

7.3 Pastoral Concerns

7.3.1 Rationale

Sacred Heart recognises that pastoral care and safeguarding are closely interlinked. Whilst not all pastoral concerns indicate abuse or immediate risk of harm, minor worries or 'nagging concerns' about a child's wellbeing can, if left unaddressed, grow into more serious problems. Our staff must therefore remain vigilant and respond proactively to any changes or signs of distress in a pupil's life.

7.3.2 What is a Pastoral Concern?

A pastoral concern can be any emotional, social or personal issue that may affect a pupil's wellbeing or behaviour. Unlike clear-cut child protection incidents (e.g. disclosure of abuse), pastoral concerns often manifest gradually and can appear low-level. Examples might include:
- Emotional: Persistent sadness, sudden mood swings, tearfulness, withdrawal from peers, signs of anxiety or low self-esteem.
- Behavioural: Noticeable drop in engagement, aggressiveness, unusual risk-taking or attention-seeking behaviour, being unusually quiet or over-compliant.
- Social: Friendship difficulties, isolation or exclusion from peer groups, concerning changes in peer relationships, rumours of bullying.
- Physical/Presentation: Neglect of personal hygiene, uncharacteristic weight change, excessive tiredness, or non-specific physical complaints.
- Academic: Dramatic shift in academic performance, frequent non-completion of homework, lateness, or unexplained absences that may indicate deeper problems.

7.3.3 Responding to Pastoral Concerns

Initial Identification

Any staff member may notice a pastoral concern. Staff should record the concern as a pastoral concern. If immediate pastoral support is warranted, the staff member should inform the pupil's form tutor, Head of Year, or the DSL.

Pastoral Support

Sacred Heart's pastoral team will explore possible causes, speak to the pupil, and, where appropriate, contact parents/carers to build a fuller understanding of the situation.

Early interventions may include:
- Mentoring or counselling sessions
- Adjustments in class seating/activities
- Peer mediation (if conflict among pupils is contributing)
- Recommendations for external services (e.g., mental health resources)

Thresholds and Escalation

Low-level concerns can be warning signs of more serious issues e.g., emotional abuse, domestic conflict, self-harm risk, so staff must remain open-minded.

If, at any point, the concern appears to indicate actual or potential risk of harm, staff must escalate to the DSL or deputy DSL immediately, in line with Section 7.1 (Recognising Abuse and Taking Action).

Pastoral staff should maintain ongoing communication with the DSL, who will decide whether a referral to external agencies (children's social care, CAMHS, police) is needed.

Monitoring and Review

The pastoral team and DSL will review pastoral logs (e.g. system entries) to identify patterns or concerning trends, such as multiple low-level notes over time that, collectively, point to neglect, bullying or emotional abuse.

Pupils receiving pastoral support should have their progress and wellbeing regularly monitored and documented.

7.3.4 When Pastoral Concerns Become Safeguarding Concerns

Some pupils may initially present with low-level difficulties (e.g. changes in behaviour or frequent unexplained absences) that don't immediately suggest abuse or harm. However, over time, these might signal underlying problems such as neglect, emotional abuse, exploitation or grooming.

Where staff observe a pattern or escalation, for example, repeated expression of self-harm thoughts, sudden fear of going home, or references to domestic arguments, the concern should be escalated to the DSL without delay.

All staff are reminded to 'think the unthinkable' & 'It could happen here'. Even seemingly small pastoral concerns may be an indicator of safeguarding risk. Early reporting is essential, when unsure, seek support and record.

7.3.5 Supporting Pupils and Families

Sacred Heart recognises that early dialogue with parents/carers and Early Years, Family Wellbeing and Early Help Service services can often prevent minor issues from becoming more serious.

Where appropriate and safe, the pastoral team will engage parents in supportive conversation, signpost local services and explore strategies that address the pupil's difficulties.

Staff will take particular care to distinguish between current safeguarding concerns and historic information to ensure past issues are presented with appropriate context.

Sacred Heart will adopt a child-centred approach, respecting the child's wishes and feelings, and ensuring they understand that caring adults are ready to listen and help.

By proactively addressing pastoral concerns, Sacred Heart aims to cultivate an environment where all pupils feel supported, understood and safe. Staff at every level play a vital role in identifying the early signs of difficulty and ensuring these concerns do not escalate into serious safeguarding issues.

7.4 FGM and Breast Ironing

Female Genital Mutilation (FGM) involves cutting and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in **Appendix 4**.

Breast ironing (also known as breast flattening) is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or to disappear.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal. Professionals have a mandatory duty to report such offences to the police.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under the age of 18 years must immediately report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under the age of 18 years must speak to the DSL and follow our local safeguarding procedures including contacting the Police.

The specific Mandatory reporting duty for teaching staff above (report directly to the police) does not apply in cases where a pupil is at risk of FGM or FGM is suspected,but is not known to have been carried out. In these circumstances, staff know they must report to the DSL who would follow local statutory safeguarding procedures, this means share the information with children services so that a multi-agency view can be ascertained.

7.4.1 Referral to Local Authority Children's Services

If any agency becomes aware of a young person who may have been subjected to or is at risk of FGM they must make a referral to Children's Specialist Services**.** If staff have a concern regarding a child that might be at risk of HBA, Forced Marriage and / or FGM they should inform the DSL who will activate local safeguarding procedures.

using existing national and local protocols for multiagency liaison with police and children's social care. (Crime and Policing Act 2026, Crown Prosecution Service HBA, Karma Nirvana, Forced Marriage Unit FMU) Suspicions may arise in a number of ways that a young person is being prepared for FGM to take place abroad.

All professionals need to consider whether any other indicators exist that FGM may have or has already taken place, for example:

- Preparations are being made to take a long holiday - arranging vaccinations or planning an absence from school.
- The young person has changed in behaviour after a prolonged absence from school.
- The young person has health problems, particularly bladder or menstrual problems.

There may be older women in the family who have already had the procedure, and this may prompt concern as to the potential risk of harm to other female young people in the same family. Younger female siblings must also be considered. Any girl withdrawn from PSHE may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

On receipt of a referral, a strategy meeting must be convened as soon as practicable (and in any case within two working days), and should involve representatives from the police, Children's Specialist Services, education professionals, and health services.

The **Strategy Meeting** must first establish whether the parents or girl has had access to information about the harmful aspects of FGM and the law in the UK. If not, they should be given appropriate information regarding the law and harmful consequences of FGM.

Where a girl has already undergone FGM, a second strategy meeting should take place within ten working days of the referral. This meeting must evaluate the information collected in the enquiry and recommend whether a child protection conference is necessary to make a decision about whether the girl continues to be suffering or likely to suffer significant harm and needs further protection, and possibly to agree a child protection plan.
A girl who has already undergone FGM should not normally be subject to a child protection conference or be included on the child protection register unless additional child protection concerns exist. However, she should be offered counselling and medical help, and consideration should be given to any other female siblings at risk.
Children's Specialist Services will liaise with the Paediatric services where it is believed that FGM has already taken place to ensure that a **Medical Assessment** takes place in line with supporting pupils at school with medical conditions.

It should be remembered that this is a one-off act of abuse to a young person, although it will have lifelong consequences, and can be highly dangerous at the time of the procedure and directly afterwards.

7.4.2 Liaison with Police

Children's Specialist Services will also refer the matter to the Police, Merton VAWG, who will participate in the investigation and consult with the Forensic Medical Examiner.

7.4.3 Assessment

Children's Specialist Services in consultation with the Police will undertake a Section 47 Enquiry if it has reason to believe that a young person is likely to suffer or has suffered FGM.

Where a young person has been identified as suffering or likely to suffer significant harm, it may not always be appropriate to remove the young person from an otherwise loving family environment. Parents and carers may genuinely believe that it is in the girl's best interest to conform to their prevailing custom. The preferred outcome for the young person is that the family agree to halt the process. Therefore, the main emphasis of work in cases of actual or threatened FGM should be through education and persuasion.

Where a young person appears to be in immediate danger of mutilation, legal advice should be sought and consideration should be given, for example, to seeking an Emergency Protection Order or a Prohibited Steps Order, making it clear to the family that they will be breaking the law if they arrange for the young person to have the procedure.

7.5 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Examples of mental health problems that may develop into safeguarding concerns, including self-harm, suicidal ideation, eating disorders and risk of suicide

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, including significant changes in behaviour, difficulty sleeping and physical signs of self-harm

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these young people's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken and reported to the DSL or a deputy. Information on mental health interventions on offer are safe, effective and appropriate for the child's needs, including local referral routes for specialist mental health support, including calling 999 or taking the child to A&E if they're in immediate danger

The Department for Education has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools . In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Better Health - every mind matters.

Ongoing staff training highlights mental health as part of safeguarding. The DSL/Deputy DSL brief staff on steps they should take if they feel that a child is in danger.

7.6 Online Safety
7.6.1 Rationale and Context

Sacred Heart recognises that technology is a significant component in many safeguarding and wellbeing issues, and that pupils are at risk of abuse and other harms both online and offline. Sacred Heart's online safety provision aims to comply with the Online Safety Act and ensure that:

- Staff and pupils understand the risks associated with the online environment.
- There is a robust approach to filtering, monitoring and using technology safely, which is reviewed annually.
- Pupils, staff and parents are empowered to report online safety concerns promptly.

Sacred Heart provides age-appropriate education and training on how to stay safe online, and to protect under-18s from harmful online content. This includes content relating to:
- Pornography, sharing images, deepfakes, and misogynistic influencers
- Self-harm, suicide and suicidal ideation content
- eating disorder content
- Generative AI and education

This section should be read in conjunction with Sacred Heart's:

- IT Acceptable Use (AUP) policies.
- Staff Handbook and Code of Conduct, addressing the use of social media and electronic communications.
- Anti-Bullying and Behaviour for Learning policies (including cyberbullying and harassment).
- Mobile Phone Policy
- AI usage Policy

As well as DfE's Mobile phones in schools' policy , which outlines the implementation of a policy whereby pupils don't have access to their mobile phone during the school day.

7.6.2 Roles and Responsibilities
Governing Body

- Oversees that Sacred Heart has appropriate policies and procedures related to online safety, filtering and monitoring, in line with Keeping Children Safe in Education (KCSIE).
- Ensures regular reviews of the effectiveness of Sacred Heart's filtering and monitoring systems.

Headteacher / Principal
- Ensures that adequate staffing, resources and training are in place to maintain robust online safety practices.
- Ensures that all staff understand their responsibility to keep pupils safe online.

Designated Safeguarding Lead (DSL)
- Takes lead responsibility for online safety, with a working knowledge of Sacred Heart's filtering and monitoring arrangements.
- Receives alerts from Sacred Heart's monitoring software and responds to any concerns in line with the Child Protection-Safeguarding Policy.
- Liaises with external partners (e.g. local authority, police, and online safety organisations) where online risks or crimes are suspected.

All Staff
- Maintain an appropriate level of professional curiosity about pupils' online activities.
- Report any suspicious or concerning activity or behaviour immediately to the DSL.
- Adhere to the Staff Code of Conduct, ensuring boundaries are not blurred when communicating online with pupils.

Mobile Phones and Cameras
- Staff are allowed to bring their personal phones to school for their own use but will use them on school premises in line with Sacred Heart's policy. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in Sacred Heart.

7.6.3 Filtering and Monitoring

In line with KCSIE 2026, the governing body ensures that appropriate filtering and monitoring arrangements are in place to safeguard children from harmful content online. This includes regular review of IT protocols, AI-related risks, and remote learning provisions.

These systems are regularly checked to ensure they remain fit for purpose and respond effectively to emerging threats, in line with the DfE filtering and monitoring standards.

The DSL (or a deputy) monitors logs and alerts generated by the software and responds in line with safeguarding procedures if any child is at risk.

There is an annual review process undertaken by SLT with governors, including to ensure that filtering and monitoring is effective from a technical perspective.

7.6.4 Education and Training

Pupils - Receive age-appropriate teaching about online safety through the curriculum, Relationships, Health, Sex Education (RHSE), computing lessons and pastoral sessions. Programmes covering online harms such as sharing images, deepfakes, pornography and misogynistic influencers, and when and where to seek help will be delivered, as well as safe online communication, cyberbullying, privacy settings, grooming and radicalisation. Topics will also include age verification to access cyberflashing, epilepsy trolling and encouraging serious self-harm. Pupils are guided on where and how to seek help if they feel uncomfortable or threatened online.

Staff - Undertake regular (at least annually) online safety training to ensure they are aware of current risks, digital trends and how best to respond to concerns. Staff are trained to recognise the indicators of child-on-child online abuse, sexting or online grooming, and supporting to understand how they can overlap with other safeguarding concerns (e.g. Child Sexual and Criminal Exploitation, radicalisation, incidents may involve serious physical assault and harm, or threat of harm with a weapon). There is an acknowledgement that it is a safeguarding issue for both the victim and the alleged perpetrator and that timely, evidence-based support can be key for prevention

Parents/Carers - Sacred Heart offers advice and guidance to parents/carers on keeping their children safe online, including recommended parental controls, privacy settings and managing social media use.

Parents/carers are encouraged to report concerns relating to online safety and to work in partnership with Sacred Heart to address incidents.

7.6.5 Responding to Online Safety Incidents

Any staff member who suspects or is alerted to an online safety incident must document the concerns and report them to the DSL or deputy DSL immediately. Where a pupil is found to have excessively or persistently accessed harmful or inappropriate content, the DSL will discuss this with them and their parents/carers to explore the underlying reasons and provide pastoral or external support if necessary.

For incidents involving potential or actual criminal activity (e.g. child sexual abuse material, grooming, hate crimes), the DSL will immediately liaise with the police and/or local authority children's social care as required. The DSL should be familiar with the guidance regarding online safety incidents, including that from the UK council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people. Pupils who commit child-on-child online abuse will be managed under the behaviour and anti-bullying policies, in addition to any safeguarding and/or criminal pathways.

Centre of Expertise on Child Sexual Abuse resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. This includes support on communicating with young people, their parents / carers, signs and indicators, safety planning and a whole setting approach

Cybercrime - Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Offences under the Computer Misuse Act 1990 (CMA) have risen substantially and the school recognises that young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications.

The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Cyber-dependent crimes include: • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded, • 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

7.6.6 Remote Learning and Devices - When delivering remote learning (e.g. in cases of health-related absence or other contingencies), Sacred Heart will ensure that safeguarding measures continue to apply online.
Staff and pupils must adhere to Sacred Heart's Remote Learning Policy, which outlines expectations for respectful communication, data protection and child protection during online lessons. The DfE guidance on remote learning will be implemented.

The use of personal devices by staff and pupils is governed by the relevant acceptable use agreements and staff must ensure that no child is put at risk when using personal equipment or online platforms.

School-issued devices are filtered and monitored by a filtering firewall system and monitoring platform.

Pupils are explicitly taught about how to stay safe when off-site, including on their own personal devices. This takes place across the curriculum, as well as through other means such as the static wallpaper on all school devices.

7.6.7 Artificial Intelligence

Artificial Intelligence has the power to transform education by helping teachers focus on what they do best: teaching. This marks a shift in how technology is used to enhance lives and tap into the vast potential of AI in classrooms. Sacred Heart looks to consider the risks and challenges alongside the opportunities and benefits. School will continue to work to ensure the safety and reliability of technology, including AI tools, to support teachers and pupils. The guidance below supports the assessment of risk:

- https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education

- Resources for schools and education settings - https://www.gov.uk/government/collections/using-ai-in-education-settings-support-materials

7.6.8 Review
The Senior Leadership Team, in consultation with the DSL and Governance, will regularly review online safety provisions. The policy and practices will be updated in response to emerging technologies, evolving threats and updates to national guidance (including KCSIE and Working Together to Safeguard Children).

Governing body oversight ensures that the effectiveness of Sacred Heart's approach to online safety is monitored and that the policy remains fit for purpose.

7.7 Family Help

Staff should be especially alert to the potential need for Early Help / Family help for pupils & families who are: disabled or have specific health needs / Have SEND (with or without an EHCP) / Are at risk of criminal exploitation or County Lines / Are frequently missing from home or education / Are at risk of modern slavery, , trafficking or sexual exploitation / Are in families experiencing domestic abuse, adult mental health or substance misuse / Are privately fostered or affected by imprisonment of a parent / Are at risk of radicalisation or 'honour' ' 'faith' based abuse / Are young carers

If family help is appropriate, the DSL will liaise with other agencies in setting up a multi-agency assessment. Staff may be required to support other agencies and professionals in contributing to an assessment, and the DSL may be required to act as the lead practitioner. DSLs understand the assessment process for providing Family Help and support staff to assist. *The school team are alert to young carers' needs and recognise that caring responsibilities can impact on attendance, attainment, behaviour and wellbeing, and that early identification is essential to make sure young carers receive support. The DSL will closely monitor the case and Sacred Heart will consider a referral to the CandF Hub if the situation does not seem to be improving. Details and timelines of interventions will be monitored and reviewed by the DSL through monitoring cases closely.

If the professional identifies the need at level three of the threshold, they should look to submit an Request for Service form indicating the level of need and intervention. The referral should always be discussed with the young person and family, with their consent clearly indicated on the form. If consent is not given, the team will look to refer if the risk is assessed as a safeguarding concern.

7.8 Referral - If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support a team member to do so. If you make a referral directly (see Section 7.1), you must tell the DSL as soon as possible. Child abuse concerns: guide for practitioners - GOV.UK The local authority will decide if a referral is needed and what course of action to take and will let the setting know the outcome. The DSL will follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, or there is a threshold disagreement, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves.

Where there are disagreements with external agencies about thresholds, decision-making or safeguarding responses, the DSL will initiate the MSCP Multi-Agency Escalation Procedure. Merton escalation procedures can be found in the multi-agency escalation procedure section of the MSCP website.

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

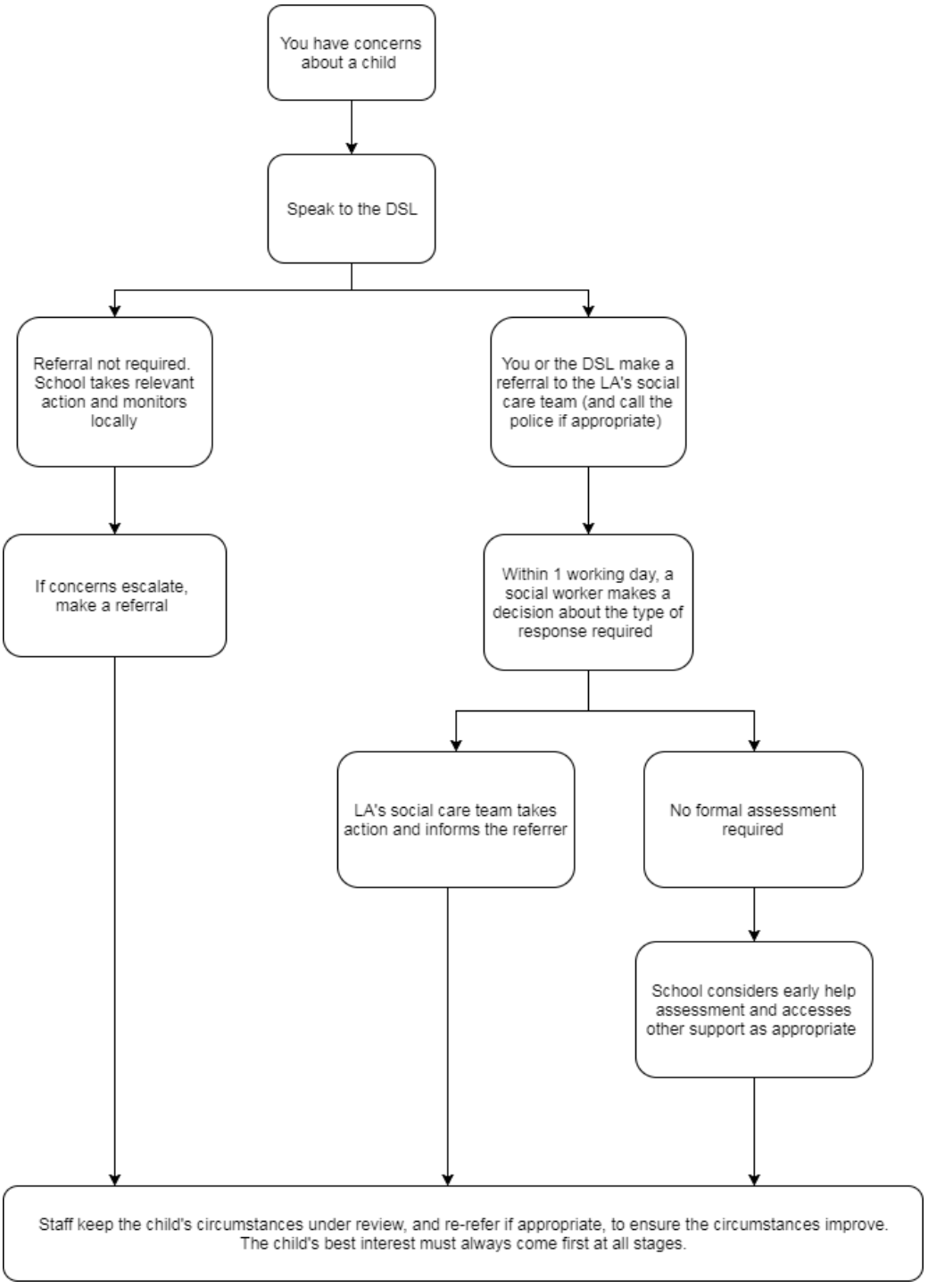
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a deputy DSL or a member of the senior leadership team if no DSL or deputy DSL is available. Seek advice from the C and F Hub. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and

supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team via the C and F Hub.

The Department for Education 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 or may be planning to travel to join an extremist group
- See, hear or are told something that may be terrorist-related.



7.10 Concerns about a Staff Member or Volunteer

If you have concerns about a member of staff (including supply staff) or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to young people, speak to the Headteacher / Principal. If the concerns/allegations are about the Headteacher / Principal, speak to the Chair of Governors.

The Headteacher / Principal/Chair of Governors will then follow the procedures set out in Appendix 3, if appropriate.

All allegations made about a staff member or anyone in a position of trust must be referred to the Local Authority Designated Officer (LADO) within 24 hours. The LADO can be contacted via email lado@merton.gov.uk. A referral form is available to complete - LADO Allegations - Merton Safeguarding Children Partnership

Staff are encouraged to self-refer where they feel they may have acted in a way that could be misinterpreted or have breached professional boundaries.

7.10.1 Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of Sacred Heart may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct (including inappropriate conduct outside of work), and
- Does not meet the harm threshold (i.e. does not indicate a risk of significant harm to a child or warrant an immediate referral to the LADO).

Concerns often cause a sense of unease or a “nagging doubt”, and can include conduct that is seemingly minor yet, when left unaddressed, could lead to an erosion of professional boundaries or a culture where more serious misconduct or abuse could go unchallenged.

Examples might include (but not exhaustive):

- Being over-friendly with pupils (e.g. having personal social media contact, meeting socially outside of school unless approved by Sacred Heart).
- Having “banter” or using inappropriate language with children that could be seen to cross professional boundaries.
- Favouritism or singling out a child or group of children for special attention.
- Failing to maintain appropriate physical boundaries (e.g., not adhering to safe-touch guidelines).

7.10.2 Aims of the Low-Level Concerns Process

- Protect children by fostering a culture of vigilance, having the mind set ‘it could happen here’.
- Maintain professional standards and uphold the Staff Code of Conduct and Teacher Standards where appropriate.
- Identify patterns of behaviour early, so that staff receive support or corrective action before concerns escalate.
- Encourage openness and the confidence to speak out, ensuring staff feel comfortable reporting concerns of any magnitude.

7.10.3 Reporting Low-Level Concerns

1. Self-reporting: Staff are encouraged to self-report, for instance, where they feel they have made a slip in conduct or sense that their behaviour may have been misinterpreted.
2. Reporting about others: Any member of staff, volunteer or contractor who has a low-level concern about another adult’s conduct should share it as soon as possible with the Headteacher / Principal (or Chair of Governors if the concern is about the Headteacher / Principal).
3. Recording: The person reporting should provide a factual account of what happened, noting the date, time and context. Where the conduct in question is a potential breach of the Staff Code of Conduct, examples or evidence (if any) should be included.
4. Staff must never assume that someone else will act. Timely reporting of seemingly minor issues helps maintain the highest safeguarding standards.

7.10.4 Responding to Low-Level Concerns

1. The Headteacher / Principal (or senior leader/designated manager) will review the reported concern, including speaking to any witnesses if necessary.
2. If, upon review, the concern appears to meet the harm threshold, it will be managed as a formal allegation in line with the procedures in Section 7.10 above and referred to the LADO (or police/children’s social care, if required).

3. If it does not meet the harm threshold, the Headteacher / Principal will handle the matter proportionately and confidentially at an appropriate management level.
4. This may involve additional supervision, training, reflective conversation or guidance to the person about whom the concern is raised.
5. Any patterns or recurring issues identified in the individual's record may indicate the need for further investigation or action.

7.10.5 Recording and retention of low-level concerns

All low-level concerns must be recorded in writing, with the details of the concern, the context and the outcome.

Records will be stored securely and, where they do not meet the harm threshold, will typically be retained for as long as the staff member remains in Sacred Heart's employment (or as advised by current safeguarding retention guidelines).

Sacred Heart will regularly review any low-level concerns to detect potential patterns of concerning behaviour. Where a pattern is identified, the school will consider a referral to the LADO and/or the initiation of disciplinary proceedings.

7.10.6 Transparency and culture of openness

Sacred Heart fosters a culture of honesty, openness and transparency.

All staff should be aware that raising low-level concerns protects pupils from harm and helps maintain professional standards.

Staff who raise low-level concerns in good faith will not face reprisal. They will be supported.

If staff have any doubts or questions about whether an incident or behaviour constitutes a "low-level concern" or a more serious matter, they should consult the Headteacher / Principal immediately for guidance.

7.11 Allegations of Abuse Made Against Other Pupils

We recognise that young people are capable of abusing their peers. This occurs when a young person intentionally threatens, harms or causes distress to another young person. We also recognise that child-on-child sexual abuse can occur between two young people of any sex and/or age. Abuse will never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviour and an unsafe environment. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with underSacred Heart's Behaviour policy, and the Safeguarding and Child Protection 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 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 sexting)

If a pupil makes an allegation of abuse against another pupil:

- You must record all allegation and tell Headteacher / Principal (and DSL where appropriate), but do not attempt to investigate.
- The DSL will contact the C and F Hub and follow advice received, 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 young people involved (including the victim(s), the young people against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and young people mental health services (CYPMHS), if appropriate.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.

- Ensuring pupils know they can discuss any concerns or worries that they may have by speaking to their form tutor, head of year or a member of the senior leadership team.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy.

Staff should always refer to any learning from the MSCP 7-minute briefing for a concise summary of approaches to child-on-child abuse. MSCP will inform agencies of any publications locally and nationally and deliver 7 minute briefings in DSL Forums.

7.12 Sexual Violence and Sexting

Sexual violence and harassment may or may not happen simultaneously and can occur both on and offline. They can happen between individuals or groups of pupils and will not be tolerated in any form. Those with SEND or those who are identify as LGBTQ+ may be particularly susceptible to such behaviours.

Department for Education guidelines with regards to the management of sexual violence and harassment between young people at school can be found in the publication, Review of sexual abuse in schools and colleges - GOV.UK

The guidance covers what sexual violence and harassment is, schools' and colleges' legal responsibilities, a whole school approach to safeguarding and child protection and how to respond to reports of sexual violence and sexual harassment. All such incidents should be immediately reported to the DSL and managed in line with this policy. Victims of harm will be supported by Sacred Heart's pastoral system.

There is a bespoke helpline for young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. The NSPCC helpline Report Abuse in Education can be contacted by phoning 0800 136 663 or by emailing help@nspcc.org.uk.

7.12.1 Harmful Sexual Behaviours (HSBs)

Harmful sexual behaviours refer to problematic, abusive and violent sexual behaviours which are developmentally inappropriate. HSBs exist on a progressive continuum, starting from harmful sexual behaviour, can if pupils are not supported, sexual harassment and through to sexual violence can occur. School staff are aware of the importance of:

- Recognising the escalatory nature of misogyny and the benefits of early identification to support the minimising the risk of HSB to escalate into sexual harassment and sexual violence
- Taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they're consensual or non-consensual
- Acknowledging Sexual behaviour between young people with an age gap could be considered harmful.

For more information, see Harmful Sexual Behaviours.

For more information and resources , see Centre of Expertise on Child Sexual Abuse

7.12.2Technology Assisted Harmful Sexual Behaviours (TA-HSB)

Technology-assisted harmful sexual behaviour (TA-HSB) refers to children or young people using digital devices to engage in sexual activity that is harmful, abusive, or developmentally inappropriate for them or others. It spans a wide spectrum, ranging from sharing self-produced images and sextortion to online grooming and the viewing of extreme pornography.

Types of TA-HSBTA-HSB involves both self-directed harms (such as inappropriate use of pornography or risky digital exploration) and behaviours that directly victimize or abuse others. Common examples include:

Image-Based Sexual Abuse (IBSA) / 'Revenge Pornography' - Non-consensual sharing or distribution of intimate, self-produced, or manipulated images.

Sextortion & Coercion – Forcing or pressuring someone to engage in sexual acts or send explicit materials by threatening to publish existing sexual content.

Grooming & Online Solicitation - Using the internet to befriend younger children or peers for the purpose of sexual exploitation.

Sexual Harassment & Bullying - Using online messaging, social media, or "deepfake" technology to degrade, embarrass, or sexually target individuals

Professionals typically evaluate these behaviours on a continuum of sexualised behaviour ranging from normal or developmentally appropriate exploration to abusive and violent acts. To identify whether a behaviour requires intervention, it is essential to consider:

Context - The level of coercion or the emotional distress of the victim. Developmental Stage - whether the action is appropriate for the chronological and developmental age of the youth. Consent & Power Dynamics - the presence of power imbalances, such as age gaps or the threat of reputational harm.

Centre of expertise on Child Sexual Abuse offers detailed research and definitions regarding how children engage in technology assisted -HSB and best practices for safeguarding. Their resources include a guide determine whether a child's digital behaviour crosses into harmful territory, providing clear guidance on how to respond and intervene.

7.12.3 Sexting

This approach is based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately. You must **not**:

- View, download or share 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, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

7.12.4 Initial Review Meeting

Following a report of an incident, the DSL may hold an initial review meeting with appropriate school staff. 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 young people's social care.
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed).
- If further information is required to decide on the best response.
- Whether the imagery 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 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 parents/carers of the pupils involved (in most cases parents should be involved).

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

- The incident involves an adult / someone in a position of trust
- 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 special educational need).

- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts, underage pupils.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (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 / Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

7.12.5 Further Review

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, hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. 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.

7.12.6 Informing Parents

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

7.12.7 Referring to the Police

If it is necessary to refer an incident to the police, this will be done through dialling **101** or through the Police website. If a pupil is deemed to be at risk of immediate harm, the police will be contacted dialling **999**.

7.12.8 Recording Incidents

All incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in Section 12 of this policy also apply to recording incidents of sexting.

7.12.9 Curriculum Coverage

Pupils are taught about the issues surrounding digital harms as part of the curriculum. Teaching covers the following in relation

- What it is
- How it is most likely to be encountered
- The consequences of online harms
- 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

8. Parent Engagement

Where appropriate, we will discuss any concerns about a young person with the young person's parents. The DSL will normally do this in the event of a concerns or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If the school believes that notifying the parents would increase the risk to the young person, we will discuss this with the Local Authority Children's Social Care Team via the C and F Hub before doing so.

In the case of allegations of abuse made against other young people, we will normally notify the parents of all the young people involved.

9. Vulnerable pupils

The DSL will liaise with the Virtual School Head and local authority to promote educational outcomes for children with a social worker.

9.1 SEN and Disability

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.

- The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Staff will be mindful of these challenges and use their knowledge of individual pupils to identify potential concerns and escalate these concerns where appropriate to do so.

9.2 Children Looked After / Care Experienced Children

The Designated Teacher for Children Looked After / Care experienced children is Sarah Norville.

The term 'looked after' refers to young people who are under 18 and have been provided with care and accommodation by family services. There are three main ways that young people and young people under eighteen years of age become looked after:

1. With parental agreement – this is under Section 20 of the Children's Act 1989: this may include short breaks.
2. Under a care order from a family court, Section 31 of the Children's Act 1989: when a care order is made, family services acquire parental responsibility and become a legal parent alongside the parent/guardian.
3. If a court orders the young person to be remanded into Local Authority accommodation.

Young people may only need to be looked after for a short period of time and then return to their family, but sometimes the arrangement is more permanent. An assessment of needs, which will include the views of the young person and the parents, will be carried out to determine the best course of action for the young person.

After the assessment of the young person and their circumstances has been completed, L.A Children's Services will agree with the family and young person the arrangements for their care.

They are set out in two documents: a care plan and a placement plan.

9.2.1 The Care Plan

A care plan is a structured document that summarises a person's health conditions, goals, treatments, and required interventions, helping caregivers and professionals deliver organised, consistent, care. It typically includes assessment data, expected outcomes and interventions. The care plan is reviewed on a regular basis through regular review meetings chaired by an Independent Reviewing Officer.

9.2.2 The Placement Plan

The placement plan sets out where and with whom the young person will live, looking at any specific arrangements about the placements including travel, and any restrictions that might be placed on the young person while placed with the foster carer for example people they cannot see. The placement plan is completed within five days of a young person being looked after.

9.2.3 Independent Reviewing Officer (IRO)

An Independent Reviewing Officer (IRO) oversees and reviews the care plans of children in care to ensure their welfare, rights, and voices are protected.

The role of the IRO is to:

- Chair the review meetings.
- Meet with the young person on their own to seek their wishes and feelings.
- Monitor the care the young person is receiving.
- Look to resolve any disputes about the review or the young person's care plan.

9.2.4 Looked After Children (LAC) Review Meetings

When a young person is looked after, their situation is regularly reviewed at Looked After Children (LAC) review meetings.

The purpose of these meetings is to:

- look at the young person's care plan,
- make sure that the right arrangements are in place for the young person whilst they are looked after,
- discuss any changes since the last review, and
- consider whether decisions made at the last meeting were acted on.

The first Looked After Children's Review meeting must be held within twenty-eight days of a young person being looked after. The second is held within the next three months and the third and later reviews are held every six

months. LAC review meetings are chaired by an Independent Reviewing Officer (IRO).

The meetings are normally attended by:
- parents/others with parental responsibility for the young person
- the social worker
- the young person
- an advocate or independent visitor
- the foster carer
- the foster carer's supervising social worker
- other professionals may be there too, but it shouldn't be so many that it overwhelms the young person.

9.2.5 Safeguarding Children who are Looked After

Children may enter care for all sorts of reasons. But most enter because they have been abused or neglected. These experiences can leave young people with complex emotional and mental health needs. And this can increase their vulnerability to abuse.

Many young people also move repeatedly in and out of care, or between placements. This can prevent them from forming stable relationships with the adults who could help protect them.

9.2.6 What Works in Safeguarding Young People in Care

No two young people in care are the same. Each young person has their own characteristics and individual needs. But all young people need strong, caring and trusting relationships with those who care for them.

Through talking to looked after young people, the NSPCC has identified six ways the care for young people and the care system can be improved:
- ensure young people's voices are heard
- strengthen the social care work force and improving practice
- promote the right to advocacy
- improve emotional support
- support transitions in and out of care
- improve public understanding of the care system

10. Complaints and Concerns about School Safeguarding Policies, Procedures and Practice

10.1 Complaints Against Staff

Complaints against staff that are likely to require a young person protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

10.2 Other Complaints

Parents and other complainants are encouraged to raise any safeguarding concerns or complaints directly with the DSL so the matter can be resolved as quickly and informally as possible. To contact the DSL, complainants should contact school@sacredheart.merton.sch.uk. Complainants should not divulge any information when using this contact methods and should simply request contact from the DSL.

The aim is to acknowledge this initial contact within the next 24 hours and following this an appointment will be made for a phone call or meeting with the DSL to take place as soon as possible and by no later than five term time working days after Sacred Heart's acknowledgment.

The DSL will take the concern or complaint seriously and seek to provide the necessary information. This might require an adjournment of the initial meeting or phone call so that further information can be gathered and then the meeting will be resumed or, if more convenient to the parent, the conversation may be completed with a phone call.

Meeting/conversation content will be logged by the DSL and recorded electronically, to indicate the nature of the concern/complaint, the steps that have been taken to provide a resolution, next steps and that the matter has been resolved, if this is the outcome.

If the matter cannot be resolved, the parents/complainants should follow Sacred Heart's Complaints Procedure so that the Headteacher / Principal is able to work to resolve the complaint. Parents or other complainants are

usually expected to lodge the written complaint within three months of the expression of initial concern. Although this period will be extended if there are special circumstances.

The Headteacher / Principal will seek to:

- Establish the facts i.e. who is involved, what has happened and how has the complaint been addressed to date.
- Clarify the precise nature of the complaint and what is unresolved.
- Meet with the complainant to clarify what they feel needs to be done to resolve the issue(s).
- Interview those concerned to establish all points of view.
- Conduct interviews with an open mind and be prepared to persist in the questioning to ensure that the facts emerge.
- Keep a record of all interviews.

The Headteacher / Principal will be responsible for ensuring that a written report of their findings is made to the complainant and that a full record of any investigation, including the original written complaint and the written report is kept on file. This record is confidential to the parent, staff involved in the investigation and the Headteacher / Principal.

The Written Report will be accompanied by a letter that explains that if the parent does not feel that the matter has been resolved, a further meeting will be arranged with the Headteacher / Principal. This letter, containing the report, will be sent no later than 10 term time working days following the stage one meeting with the parents who lodged the complaint.

If the complaint still remains unresolved, the Chair of Governors may seek advice from the Merton Safeguarding Children Partnership.

10.3 Whistleblowing

Staff receive specific training on how and when to raise safeguarding or professional conduct concerns, including to external bodies such as the NSPCC whistleblowing helpline by dialling **0800 028 0285** or emailing help@nspcc.org.uk. Sacred Heart has a whistle-blowing policy which can be viewed as a separate document here.

Whistle-blowing issues regarding the Headteacher / Principal should be raised with the Chair of Governors.

11. Record-Keeping

All safeguarding and child protection records are held on the setting's electronic recording system, My Concern.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on My Concern.

The DSL will routinely analyse safeguarding records to identify trends, evaluate the impact of interventions, and inform next steps in cases and strategies to improve outcomes for children and young people.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely on My Concern and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual young people will be retained until their 26th birthday. My Concern ensures that pupil records are deleted after this date. The DSL will ensure that any hard copies of safeguarding documents are securely disposed of after this date.

Child protection files for transferring pupils will be securely passed to the receiving school within 5 working days of the transfer (in-year) or within the first 5 days of a new term. The DSL will consider which information in a child protection file should be shared with relevant staff and when it's appropriate to do so. Files will be transferred separately from the main pupil file, and confirmation of receipt will be obtained and stored. The DSL is responsible for ensuring timely and secure transfer to support continuity of care and safeguarding oversight. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

Where information indicates a risk to others, (for example where a pupil has previously carried, threatened with or used a knife or weapon), the school, DSL and SLT will be responsible for assessing the risk and putting in place a support plan for when the child arrives. In addition:

- Appendix 2 sets out the policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- Appendix 3 sets out the policy on record-keeping with respect to allegations of abuse received against staff.

12. Staff Training & Continuing Professional Development (CPD)

12.1 All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand Sacred Heart's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the Merton Safeguarding Children Partnership.

All staff will have training on the government's anti-radicalisation strategy, Prevent Duty 2023 to enable them to identify young people at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will receive training on online harms, including cybercrime (refers to criminal activity committed using computers and/or the internet), and harm indicators linked to children missing from education (CME).

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers and Governors will receive appropriate safeguarding training.

12.2 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 and disseminate the information/training to all staff annually.

The DSL will ensure that safeguarding records are subject to annual audit to monitor consistency, quality and impact. The DSL will also provide the governing body with regular reports summarising key data, trends, training compliance and any policy updates. Sacred Heart will complete the annual Section 175 safeguarding audit as required by the Merton Safeguarding Children Partnership.

12.3 Governors

All governors receive training on safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of Governors may be required to act as the 'case manager' if an allegation of abuse is made against the Headteacher / Principal, they receive training in managing allegations for this purpose.

12.4 Recruitment – Interview Panels

At least one person conducting any interview for a post at Sacred Heart will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2026, and Working Together to Safeguard Children (2026) and will be in line with Safer Recruitment Consortium.

12.5 Staff who have Contact with Pupils and Families

All staff who have contact with young people and families will have supervisions which will provide them with support, coaching and training, promote the interests of young people and allow for confidential discussions of sensitive issues.

13. Monitoring Arrangements

This policy will be reviewed **annually** by Senior Leadership Team. At every review, it will be approved by the full Governing Body.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2026.

Appendix 1: Abuse Categories / Types of Harm

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.

- Abuse: 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. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others - particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse
- Child protection: is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or where significant harm is suggested.

- Emotional abuse: 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. In line with KCSIE 2026, it may include verbal abuse, such as persistent criticism, belittling or name-calling. 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, including interactions beyond a child's developmental capability, overprotection and limitation of exploration and learning, or preventing the child from 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.

- 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, for example 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered. Neglect is the most common reason for a child to be the subject of a child protection plan in the UK; to help combat neglect, Merton Safeguarding Children Partnership has published its multi-agency neglect strategy: Merton Neglect and Affluent Neglect

- 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.

- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 penetration with an object) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males: women can also commit acts of sexual abuse, as can other children. Most sexual abuse is committed by individuals known to the victim. The sexual abuse of children by other children is a specific safeguarding issue in education, and all staff are aware of it and of the school's policy and procedures for dealing with it (KCSIE 2026).

- Family Help: means providing support as soon as a problem emerges, at any point in a child's life. KCSIE 2026 distinguishes between universal services and community-based early help, the targeted early help level of Family Help (sections 10 and 11 of the Children Act 2004), and statutory services. In Merton this support is accessed through the MSCP family help arrangements and the C and F Hub

- Harm: is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another

- All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

Categories of Abuse, Signs and Indicators

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

Abuse: 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 by others. Abuse can be carried out both on and offline and can be perpetrated by men, women, and other children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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.

Signs that may indicate physical abuse

- Bruises, abrasions or injuries around the face, mouth, cheeks or soft areas of the body.
- Bi-lateral injuries, fingertip bruising, bite marks, strap marks, welts or injuries suggesting beatings.
- Burns or scalds, including unusual patterns, spread of injuries or deep contact burns such as cigarette burns.
- Injuries that cannot be accounted for, or explanations which are inadequate, inconsistent, excessively plausible, or where there is a delay in seeking treatment.
- Covering arms and legs even when hot.
- Inappropriate or harmful medication use.
- Aggressive behaviour or severe temper outbursts.

Emotional abuse: 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 from 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.

Signs that may indicate emotional abuse

- Overreaction to mistakes.
- Lack of self-confidence or self-esteem.
- Excessive need for approval, attention and affection.
- Sudden speech disorders.
- Unwillingness or inability to play.
- Extremes of passivity and/or aggression.
- Self-harm, eating disorders.
- Fear of parents being contacted.
- Compulsive stealing or drug, alcohol or solvent misuse.
- Secrecy relating to use of technology.

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

Signs that may indicate neglect

- Constant hunger.
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing.
- Frequent lateness, non-attendance or running away.
- Untreated medical problems.
- Loss of weight/being constantly underweight.
- Poor relationships with peers, low self-esteem or withdrawn presentation.
- Compulsive stealing and/or scavenging.
- Rocking, hair twisting or thumb sucking.

Sexual abuse: involves forcing or enticing a child to take part in sexual activities, not necessarily involving 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 penetration with an object) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the [school/college]'s policy and procedures for dealing with it.

Signs that may indicate Sexual Abuse

- Sudden changes in behaviour and/or education performance.
- Depression/withdrawal.
- Regression to younger behaviour.
- Sexualised behaviour or displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation, attempts at suicide
- Fire setting.
- Alluding to secrets which they cannot reveal, secrecy relating to use of technology, or unexplained gifts or money.
- Clinginess and/or need for constant reassurance
- Distrust of familiar adults or anxiety about being left with specific people.
- Fear of undressing, for example for PE.
- Sexually transmitted infection or pregnancy.

The Centre of Expertise on Child Sexual Abuse provides resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

Keeping children and yourself safe when responding to disclosures

Staff are encouraged to be professionally curious as it is vital for the early identification of abuse and neglect. They should try to understand the daily life of the child and explore any indicators of abuse and neglect to fully assess any potential risk by having a holistic view and understanding and this means not taking things at face value by exercising respectful uncertainty.

1. **Receive**
   - Keep calm
   - Listen to what is being said without displaying shock or disbelief
   - Take what is being said to you seriously
2. **Respond**
   - Reassure the pupil that they have done the right thing in talking to you

- Be honest and do not make promises you cannot keep e.g. “It will be alright now”
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt if the pupil refers to it e.g. “you’re not to blame”
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- Do not ask leading questions; “Did he/she….?” Such questions can invalidate evidence.
- Do ask open “TED” questions; Tell, explain, describe
- Do not criticise the child who harmed; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you must do next and who you must talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

5. Remember

- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals.

Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

We will record all information on the checks carried out in Sacred Heart's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New Staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with young people.

All offers of employment will be subject to the satisfactory completion of the employment checks and suitable references, reflecting legislative changes, specifically the Crime and Policing Act 2026.

Regulated activity means a person who will be:

- Any person volunteering in a role that involves teaching, training, instructing or supervising children frequently, overnight or more than 3 days in a 30-day period.
- Regulated activity includes providing advice or guidance on physical, emotional or educational wellbeing and driving a vehicle only for children

Existing Staff

If there are concerns about an existing member of staff's suitability to work with young people, Sacred Heart will carry out all the relevant checks as if the individual was a new member of staff. This will also be done if an individual moves from a post that is not regulated activity to one that is.

A referral will be made to the DBS for anyone who has harmed, or poses a risk of harm, to a young person or vulnerable adult where the individual has engaged in relevant conduct, i.e. conduct that:

- endangers a child or is likely to endanger a child;
- if repeated against or in relation to a child would endanger the child or be likely to endanger the child;
- involves sexual material relating to children (including possession of such material);
- involves sexually explicit images depicting violence against human beings (including possession of such images); or
- is of a sexual nature involving a child.

- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a young person or vulnerable adult or put them at risk of harm) and the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and Third-Party Staff

Written notification will be obtained from any agency or third-party organisation that they have carried out the relevant checks that Sacred Heart would perform on any individual who will be working at educational setting. In respect of an enhanced DBS check, Sacred Heart will ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

Identification checks will be made. The person will be expected to produce their current DBS certificate and a form of identification in line with ID checking guidelines.

Contractors

Sacred Heart will ensure that any contractor, or any employee of the contractor, who is to work at Sacred Heart has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with young people

Where the contractor does not have opportunity for regular contact with children, the school will decide on whether a basic DBS check would be appropriate. If a person working at school is self-employed, we will either obtain the DBS check or request to see the certificate, to ensure the DBS check is at the level required.

Will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

Sacred Heart will ensure that our safeguarding requirements are set out in the contract between the contractor and Sacred Heart.

Trainee/Student Teachers

Where applicants for initial teacher training are employed, Sacred Heart will ensure that all necessary checks are carried out.

For fee-funded trainee teachers, written confirmation from the training provider will be sought to ensure that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with young people. The trainee teacher will also be expected to produce their current DBS certificate and a form of identification.

Visitors

Sacred Heart will have different types of visitors, those with a professional role i.e. educational psychologists, social workers etc., those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity in school such as a sports day.

Sacred Heart will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteacher / Principal will exercise professional judgement about the need to escort or supervise visitors on site.

For visitors there in a professional capacity, Sacred Heart will check ID and determine whether the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks in line with Sacred Heart Visitors Policy.

Volunteers

- An enhanced DBS check with barred list information will be obtained for all volunteers who are working in regulated activity. A person will also be in regulated activity as a result of their work or volunteering, they: will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

  The school will follow the requirements for DBS checks for volunteers in regulated activity, set out by the DfE.

  Sacred Heart will obtain an enhanced DBS check (with barred list information) for all volunteers who are working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly or provide personal care on a one-off basis.

  Existing volunteers do not have to be re-checked if they have already had a DBS check (which should include children's barred list information if engaging in regulated activity). However, if Sacred Heart has any concerns, it will consider obtaining a new DBS check at the level appropriate to the role.

Governors

- All Governors will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff Working in Alternative Provision Settings

Where we place a pupil with an alternative provision (AP) provider, written confirmation from the provider will be obtained to ensure that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform, in line with the national standards for non-school Alternative Providers. The DSL will ensure appropriate safeguarding information is shared with the alternative provision provider, in line with information sharing, confidentiality and data protection requirements, so that the child can be safeguarded and supported effectively:
Merton alternative provision

Adults who Supervise Pupils on Work Experience

When organising work experience, we will ensure that policies and procedures are in place to protect young people from harm. We will consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight.
You must not allow someone on the barred list to take part in regulated activity.

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, Sacred Heart will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Appendix 3: Allegations of Abuse Made Against Staff / Those in a position of trust

For employees, this Appendix should be read in conjunction with Sacred Heart's Disciplinary Policy. This section of this policy is about managing cases of concerns/allegations that might indicate a person could pose a risk of harm if they continue to work in their present position, or in any capacity with children in school.

Reference is made to 'allegation/s' for ease. It applies to all cases in which it is alleged that a current member of staff, supply agency staff or volunteer has:

- Behaved in a way that has harmed a young person, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a young person or young people in a way that indicates he or she would pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates that he or she would not be suitable to work with children

It applies regardless of whether the alleged conduct/abuse took place in Sacred Heart. If an allegation relates to conduct outside of school, this is referred to as 'transferable risk'. Allegations against any person who works with young people must be taken seriously. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff, supply staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a young person or other young people is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within Sacred Heart so that the individual does not have direct contact with the young person or young people concerned.
- Providing an assistant to be present when the individual has contact with young people.
- Redeploying the individual to alternative work in Sacred Heart so that they do not have unsupervised access to young people.
- Moving the young person or young people to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If suspension is required, the staff member will be suspended in accordance with Sacred Heart's disciplinary policy and procedures.

If suspension is deemed appropriate, the employee will receive a named contact. Reasons for the suspension will be provided within one working day, but complete details may be unavailable to disclose due to the involvement of other authorities/agencies. The case manager and employee will agree the support to be in place during the investigation and communicate the expected timescales and likely course of action. If part of a trade union, the staff member must be advised to contact them. The employee's manager will be informed that they have been suspended whilst an investigation is completed, but no further details will be given.

Definitions for Outcomes of Allegation Investigations used in this Appendix

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation.
- **False:** there is sufficient evidence to disprove the allegation.

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately, the options open to Sacred Heart depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

Procedure for Dealing with Allegations

In the event of an allegation meeting the criteria in the first paragraph of this Appendix above, the Headteacher / Principal (or Chair of Governors where the Headteacher / Principal is the subject of the allegation) – the 'case manager' – will take the following steps:

- Conduct basic enquiries to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, whether the individual was in Sacred Heart at the time of the allegations; whether the individual did or could have come into contact with the child; whether there are any witnesses; and whether there is any CCTV footage.
- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to young people or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with young people at Sacred Heart is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- In relevant cases, inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies. Possible outcomes at this stage include:
    - **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at Sacred Heart and their contact details
    - **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
    - **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action and investigation in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the young person/young people involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the young person/young people involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a young person, or if the individual otherwise poses a risk of harm to a young person.

If Sacred Heart is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in Sacred Heart's disciplinary process, should this be required at a later point.

Timescales

The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process.

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will usually be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will usually institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will normally hold this within 15 working days.
- In other cases, the first review should take place no later than four weeks after the initial assessment.

Specific Actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or children's social care services. The options will depend on the circumstances of the case, and the consideration should consider the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Conclusion of a case where the allegation is substantiated

If an allegation that an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child, is substantiated (including cases where the individual is dismissed or Sacred Heart ceases to use their services, or the individual resigns or otherwise ceases to provide their services), a referral to the DBS must be made. The case manager may discuss this with Sacred Heart's HR / Business Manager and the local authority's designated officer (LADO).

If the individual concerned is a member of teaching staff, the case manager must consider whether to refer the matter to the Teaching Regulation Agency. The school will consult the Public Sector Equality Duty (PSED) when considering a referral to the Teaching Regulation Agency when considering prohibiting the individual from teaching and may discuss this with the personnel adviser, HR support and/or local authority's designated officer.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager can access guidance to support the return to work from HR or the LADO as most people will benefit from help and support after a stressful experience.

The case manager will also consider how best to manage the individual's contact with the young person or young people who made the allegation, if they are still attending Sacred Heart.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Headteacher / Principal, or other appropriate person in the case of an allegation against the Headteacher / Principal, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to

consider whether action against those who made the allegation might be appropriate, even if they are not a pupil. If the allegation is determined to be malicious the case manager and LADO should consider whether the young person who has made the allegation needs help or is at risk of abuse. In such circumstances, they may make a referral to social care.

Supply Workers

Supply teachers, whilst not employed by Sacred Heart, are under the supervision, direction and control of the governing body or Headteacher / Principal when working in Sacred Heart.

Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. Sacred Heart will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are considered by Sacred Heart during the investigation.

When using a supply agency, Sacred Heart will inform the agency of its process for managing allegations but also take account of the agency's policies and the duty placed on agencies to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Confidentiality

Sacred Heart will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a young person/ young people involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-Keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).
- A copy provided to the person concerned where agreed by children's social care or the police.
- A declaration on whether the information will be referred to in any future reference.

If an allegation or concern is not found to have been malicious, Sacred Heart will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning Lessons

After any cases where the allegations are ***substantiated*****,** the circumstances of the case will be reviewed with the local authority's designated officer (LADO) to determine whether there are any improvements that we can make to Sacred Heart's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. How future investigations of a similar nature could be carried out without suspending the individual will be considered.

Appendix 4: Specific Safeguarding Issues

Children Missing from Education (CME)

A young person going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or young person criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. *All* unexplained absences are a safeguarding concern and will be investigated as part of a supportive approach through Sacred Heart's Attendance Review Framework.

There are many circumstances where a young person may become missing from education, but some young people are particularly at risk. These include young people who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveler families
- Come from the families of service personnel
- Go missing or running away from home or care
- Are supervised by the youth justice system
- Cease attending a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. Sacred Heart will send a text to emergency contacts by 09.30am if a pupil does not attend without a reason being provided. At least two emergency contacts are held for all pupils where possible.

We will inform the local authority if a young person leaves Sacred Heart without a new school being named and adhering to requirements regarding sharing information with the local authority when removing a young person's name from the admission register at non-standard transition points where applicable.

The Attendance Officer will hold a list of pupils for whom there are known safeguarding issues. The DSL will be made aware of these pupils' absence as soon as possible in order to take any safeguarding steps which may be needed.

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 missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a young person is suffering from harm or neglect, we will follow child protection procedures as outlined in this policy, including with respect to making reasonable enquiries. We will make an immediate referral to the C and F Hub, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include young people being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE - young people who

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- who suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in, or are excluded from education.

CCE can be committed or facilitated by an organised network, and the victim may identify as being part of this group. This could constitute modern slavery, and a modern slavery referral should be completed where a potential victim is identified. Victims aren't always recognised and can be criminalised for actions they take while under coercion, and that's a significant concern.

Child Sexual Exploitation (CSE)

CSE is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and young people or adults. Most sexual abuse is committed by those previously known to the victim. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being a physical abuse, can be facilitated and/or take place wholly online.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the C and F Hub and the police, if appropriate. Indicators of sexual exploitation can include a young person:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Brook have developed free resources and a comprehensive list of CCE & CSE indicators and spotting the signs toolkit can be found here: FREE Spotting the Signs Tool

Child Centre for Expertise on Child Sexual Abuse also have a range of free toolkits and resources including signs and indicators template

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include: • increased absence from school or college, • a change in friendships or relationships with older individuals or groups, • a significant decline in educational performance, • signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries• unexplained gifts or new possessions They could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. The likelihood of involvement in serious violence may be increased by factors such as:

• being male
• having been suspended, spent time in Alternative Provision or permanently excluded from school
• having experienced child maltreatment
• having been involved in offending, such as theft or robbery
• having used drugs or alcohol in early adolescence, and
• having previously been a victim or previously perpetrated violence

A comprehensive list of risk factors can be found in the Home Office's Serious Violence Strategy.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (DSL) or deputy. The DSL or deputy will:

- Assess the risk to the individual pupil and others in the school, considering wider information or concerns
- Put in place a safety and support plan depending on the risk
- Consider actions to de-escalate peer conflict where relevant

Staff need a keen awareness that violence can often peak in the **hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places**. Further advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. Practical guidance for schools and colleges and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence via The Youth Endowment Fund.

Lesbian, Gay, Bisexual and Transgender (LGBTQ+) and Social Transition Pupils

Sacred Heart believes that respect is a fundamental right and responsibility for all. It is the duty of all employees to ensure that every member of the Sacred Heart community feels valued, irrespective of their sexual/gender orientation, race or religion.

Diversity is celebrated and valued andSacred Heartwill endeavour to ensure that LGBT pupils have a trusted adult with whom they can be open. Children may at any time question their gender identity or express that they are not the sex biologically assigned to them. Young children go through a period of questioning their gender, but for the majority this will not continue into adulthood.

Sacred Heart is aware of the potential vulnerabilities of these children (e.g. the possibility of complex mental health and psychosocial needs, for example relating to relationships with family and peers) and adopts policies that maintain flexibility and takes a strong, proactive stand against all forms of bullying.

Staff will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious. The school will work with a child and their family to support them on their journey and to put in place a bespoke package which allows them to take appropriate steps forward. A child may be in a vulnerable state as they try to navigate their feelings. It is also important to understand that parents and family may also struggle to come to terms with the wishes and intentions of their children.

The school will actively involve parents/carers where a child who is questioning their gender asks for support, unless there are circumstances where doing this would constitute a greater risk to the child than not involving them.

Where a child or their parent/carer has raised a request relating to social transition, the school will:

- Consider the best way to support the child and take the necessary steps when a child requests support

- Document decision-making processes and keep records, ensuring compliance with safeguarding legislation and equality and human rights law
- Ensure any assessment is informed and evaluated with the welfare and best interests of the child and other children at the heart of any decision making.

See paragraphs 262-265 and 278-282 in KCSIE for more detail on reviewing previous decisions, recording correct information, children 'living in stealth' and supporting children who wish to detransition (282) Safeguarding requirements relating to school premises and single sex sport can be found here: KCSIE 2026

Sacred Heart will endeavour to support families during this time, but the welfare and safety of the pupil will always come first.

Staff should **not** adopt any changes relating to social transition unless a decision has been made by SLT/DSL and the child's parents/carers have been involved. In addition to caring for the welfare of children, we will ensure that the legal rights of children are observed under the Equality Act 2010 and associated legislation.

County Lines

'County Lines' is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting young people and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine, crack cocaine and Ketamine are the most common drugs being supplied and ordered. In most instances, the users or customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target young people and adults – often with mental health or addiction problems – to act as drug runners or move cash so they can stay under the radar of law enforcement.
In some cases the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing. Dealers will also create drug debts in order to control the young person with the fear that they or their family will be subject to violence if the debt is not worked off.
People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.
As we have seen in child sexual exploitation, young people often don't see themselves as victims or realise they have been groomed to get involved in criminality. It is important that Sacred Heart plays a part to understand county lines and speak out if we have concerns. Signs that suggest involvement in county lines:

- Frequently missing from school or home / Travelling alone to places far away from home / not attending education
- Suddenly have lots of money / lots of new clothes / new mobile phone / Receiving more calls or texts than usual / Carrying or selling drugs / Carrying weapons or know people that have access to weapons
- Relationships with or hanging out with someone/people that are older and controlling
- May have unexplained injuries / seem scared very reserved or seem like they have something to hide / self-harm

Signs that county lines are happening in a specific area: An increase in visitors and cars to a house or flat / New faces appearing at the house or flat / New and regularly changing residents (e.g. different accents compared to local accent)

- Change in residents' mood and / or demeanour (e.g. secretive / withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia / Changes in the way young people might know dress
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc.) / Residents or young people you know going missing, maybe for long periods of time
- Young people seen in different cars / taxis driven by unknown adults / seeming unfamiliar with your community or where they are. / Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community / Unexplained injuries
- Details can be found here - County Lines and Criminal Exploitation – Merton Safeguarding Children Partnership

Action to be taken if county lines is suspected

Sacred Heart will report any concerns to the police by dialling 101, or in an emergency 999. Concerns may also be reported by calling Crimestoppers on 0800 555 111.
Any concerns linked to the railways will be reported to the British Transport Police by texting 61016 or by dialling 999 in an emergency. The DSL may choose to involve Catch 22, to ensure that young people who have become involved in county lines are able to access specialist support and avoid further involvement in situations that they find difficult to get themselves out of. The DSL may make a referral to the C and F Hub if it is suspected that a young person is at risk of harm.

Contextual Safeguarding, Risk / Harm outside the home (ROTH) and Extra-Familial Harm
Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm outside of their families, including within peer groups, local neighbourhoods and online environments.

Traditional child protection models have tended to focus on risks within the home, typically involving parents, carers or other trusted adults. However, this does not account for the considerable amount of time young people spend in social settings beyond their family, where peer influence, unsupervised environments and online platforms may pose significant risks to their safety, wellbeing and development.

Harm outside the home (HOTH) recognises that a child's environment and social context, including their peer network, community and wider societal influences can shape their behaviours, experiences and vulnerability. Consequently, it seeks to identify and respond to harm occurring in these domains and to address the systems, norms and settings that allow such harm to occur. This includes altering unsafe environments as well as supporting the individual child.

Research has shown that young people are often influenced as much by social dynamics and external factors as by family relationships. Sacred Heart therefore considers these broader influences when assessing safeguarding risk and designing interventions. HOTH encompasses a range of extra-familial harms, including (but not limited to):

- Child-on-child and relationship abuse
- Child criminal exploitation (CCE) and child sexual exploitation (CSE)
- Online abuse, grooming and harassment
- Missing episodes or absconding from education
- Gang involvement, serious youth violence and knife crime
- Radicalisation and extremist ideologies
- Trafficking and modern slavery
- Abuse or exploitation in public spaces, including transport networks, shops, parks or parties

All staff have a duty to be alert to such risks and apply professional curiosity when assessing a young person's context. Where concerns arise, they must be recorded and referred to the Designated Safeguarding Lead (DSL).

The DSL will:
- Review contextual information, including peer dynamics, local intelligence and online activity where appropriate.
- Undertake contextual risk assessments, especially where patterns of harm or vulnerability extend beyond the home.
- Liaise with external agencies such as the Children's Services , Youth Services , Family Help or Police as necessary.
- Work with relevant partners to change or manage the environments where risk is present, and ensure interventions are child-centred, proportionate and responsive to the wider context.

Domestic Abuse
At Sacred Heart, we recognise the definition of domestic abuse set out in the Domestic Abuse Act 2021, which identifies children who see, hear or experience the effects of domestic abuse as victims in their own right. Domestic abuse can occur between intimate partners, former partners, family members, within young people's relationships, and through child-to-parent abuse.

Staff are trained to recognise the signs of domestic abuse and understand the importance of early identification, support and multi-agency working. Abuse may be physical, sexual, emotional, psychological, financial, controlling or coercive, technology-facilitated, or involve stalking, harassment, honour-based abuse, Violence Against Women and Girls (VAWG), or Child-to-Parent Violence and Abuse (CPVA). Further advice and guidance can also be found on Merton Family Support and Parenting

Staff should remain professionally curious and alert to indicators of domestic abuse. Any child can be affected, regardless of age, sex, gender identity, sexual orientation, ethnicity, disability, religion, culture or socio-economic background. Children who experience domestic abuse will be provided with appropriate safeguarding support and intervention.

Sacred Heart recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can include, but is not limited to, psychological, physical, sexual, financial/economic or emotional abuse, including coercive and controlling behaviour. Domestic abuse can take place inside or outside the home and within different types of relationships, including intimate partner relationships, ex-partners and family members. Types of domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent or caregiver abuse.

school/college] recognises that anyone can be a victim of domestic abuse, regardless of sex, age, ethnicity, socio-economic status, sexuality, background or identity.

school/college] recognises children can be victims of domestic abuse in their own right if they see, hear or experience the effects of abuse. Children may also experience domestic abuse within their own intimate relationships, sometimes referred to as 'teenage relationship abuse'. Where one or both children are under 16, this may not fall within the statutory definition of domestic abuse, (under the DA Act 2021 it only recognises those 16 years and over) but it will still be responded to as a safeguarding concern.

As with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and support offered to both the reporting child and reported child or where concerns have been shared by a third party for both pupils in the relationship.

school/college] recognises that domestic abuse can have a detrimental and long-term impact on children's health, wellbeing, development and ability to learn.

school/college] recognises that domestic abuse may occur, continue or escalate following separation. Concerns will not be viewed in isolation, and the [school/college] will consider the child's lived experience, family circumstances and any wider safeguarding risks.

Staff will respond to domestic abuse concerns in a trauma-informed way and will avoid victim-blaming language or assumptions.

If staff are concerned that a child may be seeing, hearing or experiencing the effects of domestic abuse, or experiencing abuse within their own intimate relationship, they will report their concerns to the DSL.

The DSL will consider concerns about domestic abuse in line with this policy, Merton procedures for referral and support and any relevant local or national guidance. Where the concern indicates a need for Family Help, statutory support or protection, the DSL should a Request for Service should be made via C and F Hub and where there are concerns for an adult or those aged 16 and 17 years old a referral to the local IDVA service should be done via

Merton.CommunityIDVA@victimsupport.org.uk

and if high risk after completing a DASH risk assessment refer to the Multi Agency Risk Assessment Conference meeting (MARAC) via Merton MARAC team: **merton.marac@merton.gov.uk** .

If a child or adult is in immediate danger, emergency services will be contacted using 999.

Operation Encompass and Police Notifications

Sacred Heart is part of Operation Encompass, a national initiative that ensures schools are notified by the police before the start of the next school day when a pupil has been involved in, or exposed to, a domestic abuse incident in the home.

This information sharing enables Sacred Heart to provide timely, appropriate pastoral support to affected children and their families.

Key Features:

- Operation Encompass notifications are received by the Designated Safeguarding Lead (DSL), who is trained in receiving and handling the information confidentially.
- The DSL ensures that appropriate support is offered to the child discreetly and sensitively on the same day.
- No direct disclosure is made to the child unless deemed appropriate by the DSL, in consultation with relevant agencies.

In addition to domestic abuse incidents, schools may also be notified via police reports if:

- A pupil has been reported missing or absent in circumstances that give rise to concern
- A pupil has been arrested or involved in a criminal incident
- A welfare concern is identified through police attendance at a property

Where such information is shared:

- The DSL will assess whether the incident meets the threshold for Family Help or Children's Social Care referral.
- The incident will be recorded securely with due regard for confidentiality and data protection.
- Parents will be contacted where appropriate, in line with advice from the police or safeguarding partners.

We recognise that timely information sharing with schools by the police can play a critical role in identifying risk, reducing harm and ensuring a coordinated safeguarding response. Sacred Heart works in close partnership with the Police, Merton Safeguarding Children Partnership and other relevant agencies to ensure the best outcomes for children. Where the [school/college] is unsure how to respond to an Operation Encompass notification, advice may be sought from the C and F Hub or from the Operation Encompass advice and helpline service: 0204 513 9990.

When we at SCHOOL are concerned about the amount of police notifications or disclosures of domestic abuse we will seek further advice.

This may include contact with:

- Merton has a confidential drop-in service for people experiencing domestic abuse. It's held every Monday between 9.30am -12.00 noon (except bank holiday Mondays) at Morden Baptist Church, Crown Lane, Morden, SM4 5BL. You can call the Domestic Abuse IDVA service on 020 7801 1777. This service can also be accessed by those experiencing domestic abuse and SCHOOL may also signpost you to this service. The school can also call the IDVA service and ask for advice.

- Consultation and / or Referral to Adult Social Care
- Consultation and / or Referral to Children and Families Hub
- Completing an Early Help Assessment or
- complete a DASH to support the family
- make / discuss a MARAC Referral (**merton.marac@merton.gov.uk)**
- Further information can be found at: What is domestic abuse?

The National Domestic Abuse Helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Homepage - National Domestic Abuse Helpline provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- How to Protect Children From Domestic Abuse | NSPCC
- What is domestic abuse? - Refuge
- Safe Young Lives | Young people & domestic abuse - SafeLives
- Domestic abuse: specialist sources of support - GOV.UK
- Home : Operation Encompass

Children who are in Elective Home Education (EHE)

We recognise that parents have the right to educate their children at home. However, we are also aware that some children receiving Elective Home Education may be more vulnerable to safeguarding risks due to reduced visibility to professionals. Where concerns exist, we will work with the Local Authority and other agencies as appropriate to ensure that children are safe, their welfare is promoted, and they receive a suitable education.

school/college] recognises that many home educated children have a positive learning experience, and that parents/carers may choose elective home education with their child's best education at the heart of the decision.

school/college] also recognises that elective home education can mean some children are not in receipt of suitable education and may become less visible to the services that are there to keep them safe and supported.

Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with national Elective Home Education guidance, the School Attendance (Pupil Registration) (England) Regulations 2024 and local Merton guidance.

Where possible, school/college] will work with the local authority, parents/carers and other key professionals to ensure that the implications of elective home education have been considered before a final decision is made and that decisions are made in the best interests of the child. This will be particularly important where the child has SEND, an Education, Health and Care plan, has or is known to partner agencies, or is otherwise vulnerable.

school/college] will consider local guidance and tools to support proportionate safeguarding checks, information sharing and decision-making before a child is removed from roll. This will include considering the child's lived experience, any existing safeguarding or welfare concerns, parental responsibility arrangements, SEND or EHCP needs, young carer status, attendance, and whether further advice or a Request for Service is required. Where there are safeguarding or welfare concerns, the DSL will refer to C and F Hub to discuss and Request for Service.

Private Fostering

Private fostering is when a young person or young person under 16 years old (or under 18 if disabled) lives with someone for 28 days or more by private arrangement (without the involvement of a local authority) with someone who is not a:

- Parent or close relative (brother, sister, aunt, uncle, grandparent or step-parent)
- guardian or a person with parental responsibility

Private foster carers might be:

- friends of the young person's family
- someone willing to care for the young person of a family they don't know; or relatives not mentioned in the list above, for example a cousin or great aunt

Examples of private foster care arrangements:

- young people sent to this country for education or health care by parents or guardians living overseas
- teenagers living with a friend's family as a result of problems at home
- young people on holiday exchanges
- young people whose parents' study or work involves unsociable hours, which make it difficult for them to use ordinary day care or after school care

Reporting an arrangement:
All private fostering arrangements will be reported, where private fostering arrangements come to the attention of Sacred Heart for example, through the normal course of their interaction and promotion of learning activities with children, we must notify Merton Local Authority in line with the local arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child: How to notify Merton Children's Social Care: you must contact the Children and Families Hub (formerly known as the MASH) Team on 020 8545 4226 or 020 8545 4227

Homelessness
Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL (and any deputies) should make any referrals via C and F Hub so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into LA Children's Services where a young person has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The Homeless Reduction Act Factsheet usefully summarise the new duties. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of young people who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the young person's circumstances.

Family Members in Prison
Young people who have children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. The school understands the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.Sacred Heart will work with agencies and resources such as NICCO to help mitigate negative consequences for those young people. **Support for families and friends of prisoners**

Young People and the Court System
Young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides**,** published by HM Courts and Tribunals service, to support young people aged 5-11 years and 12-17 years**.** The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making young person arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for young people. To support, there is an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

'Honour or Faith-Based' Abuse (including Female Genital Mutilation (FGM) and Forced Marriage)
'Honour or Faith based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All staff will be alert to the possibility of a young person being at risk of HBA or already having suffered it. If staff have a concern, they will record their concerns and speak to the DSL, who will make a referral to the C and F Hub. The DSL will consider concerns in line with this policy, and any relevant national (Karma Nirvana website) or local guidance. If there is an immediate threat or danger, the police will be contacted.

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to young people affected by FGM or at risk of FGM.

Section 7.4 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include and may initially mirror those of sexual abuse:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other young people about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced Marriage

Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the C and F Hub.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk.
- Ensure that the pupil has a single point of contact in school who they can talk to, and refer for support from external agencies as necessary.

If staff have a concern regarding a child that might be at risk of HBA, Forced Marriage and / or FGM they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. (Crime and Policing Act 2026, Crown Prosecution Service HBA, Karma Nirvana, Forced Marriage Unit FMU)

Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. The education sector has a duty to prevent young people from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify young people at risk.

Preventing radicalisation and extremism : There will be an assessment carried out to look at the risk to the cohort of young people being drawn into terrorism. The assessment will be based on an understanding of the potential risk in our local area, in collaboration with C and F Hub, local authority Community Safety Team and Police

There will be suitable internet filtering is in place to equip pupils with the necessary skills to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC identify signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities that they used to enjoy
- Converting to a new religion / ideology
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Young people who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that the signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong or if they are unsure.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including recording their concerns and discussing their concerns with the DSL. Staff should **always** act if they are worried.

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity.

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 in line with Sacred Heart visitor to school protocol.

Visitors are expected to sign in upon entry and wear a visitor's badge.

Visitors to Sacred Heart 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 enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into Sacred Heart 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.

Missing Child Procedure

1. Purpose

1.1. It is essential that the necessary steps are taken to safeguard and promote the welfare of all young people, and this is seen as an utmost priority. Any young person going missing from a class is a safeguarding issue.

1.2. The procedure will be followed alongside the Child Protection and Safeguarding Policy and any other relevant school policy or procedure.

1.3. All staff must understand what to do in the event that a young person were to be lost or go missing either from Sacred Heart building, site or during an off-site visit.

1.4. It is the responsibility of the DSL and Headteacher / Principal to ensure that these procedures are understood and followed.

1.5. It is the responsibility of all staff to read these procedures and to act at all times accordingly.

2. Introduction

2.1. The procedures have been adopted in respect of any young person who goes missing from the premises or wanders off from our care, even if they remain on site.

2.2. The procedures will be used in respect of all cases in which it is found that a young person is lost or missing.

2.3. The policy enables a child missing situation to be dealt promptly and professionally in a "worst case scenario" of a missing young person. It emphasises the responsibility for attendance, registers and keeping young people safe.

2.4. Due consideration will be given by the DSL as to whether a referral to the C and F Hub is required. For example, where the young person needs protection, family help or in need of other support.

2.5. Staff are responsible for completing the attendance registers, including at after school clubs and activities. The register must be completed accurately and promptly. The law requires schools to have an attendance register taken both in morning and afternoon sessions.

3. Steps to Keep Young People Safe

3.1. All procedures will be managed with common sense and sound judgement.

3.2. For all pupils, we must only release young people into the care of individuals who have been notified to us by the parent/carer(s) in advance, and we must ensure that young people do not leave the premises unsupervised. We must take all reasonable steps to prevent unauthorised persons entering the premises and have an agreed procedure for checking the identity of visitors.

3.3. At all times, parents can be assured that all young people remain within the safe environment of our school/ setting, including attendance at any outings. We ensure that proper precautions are taken to prevent young people going missing.

3.4. If any young person is found to leave the premises without permission of Sacred Heart and parents, they will be deemed to have broken Sacred Heart's code of conduct, and the application of appropriate and proportionate sanctions will be considered by the Headteacher / Principal accordingly.

3.5. It is the responsibility of parents to ensure they provide correct and updated information on a timely basis and know the procedures for handover of their young person.

3.6. Particular care will be taken to formally register all young people on the school attendance system at the start of every lesson. As a minimum, any unexplained absences will be reported immediately to the DSL and school attendance officer by the teacher so that swift and immediate action will be taken. This should be done via email.

In the absence or unavailability of the DSL, the deputy DSLs will assume these responsibilities. On the rare occasion of the DSL and the deputies all being unavailable, any other member of the senior leadership team will assume responsibility for these procedures. In the case of incidents occurring while young people are learning outside the classroom on school visits, the visit leader will assume such responsibility, as agreed with the Educational Visits Coordinator on behalf of the DSL and Headteacher / Principal.

As soon as a pupil is reported missing from a lesson, a search of Sacred Heart premises will be undertaken.

This search will be co-ordinated by the DSL supported by staff in the Sacred Heart school office and any other member of staff available at the time. The search of all of the obvious places – including toilets, empty rooms and Sacred Heart grounds – should take no more than 15 minutes.

If the pupil has not been found, parents will be contacted. They will be advised of what has happened and will be asked to try to contact their child by calling her mobile number (where applicable). If after a further 15 minutes, there has been no contact with the young person and they are not found, the DSL will dial the police on **101**. If there is reason to suspect that the young person is at risk of harm or in immediate danger, the police emergency number (**999**) will be dialled.

The information required by the police to assist in locating and returning the pupil to a safe environment is as follows:

- The pupils name(s); date of birth; status (for example, CLA); responsible authority
- Where and when they went missing
- Previous missing episodes (if any) and where they went
- Who, if anyone, they went missing with
- What the young person was wearing plus any belongings they had with them such as bags, phone (include mobile number)
- Description and recent photo
- Medical history, if relevant
- Time and location last seen
- Circumstances or events around going missing with relevant safeguarding information
- Details of family, friends and associates

Whilst the search is ongoing, Sacred Heart will continue to liaise with the police and act in accordance with police instructions.

Option 1 – if the young person is found before the police have arrived then the police must be informed and procedures need to be followed.

Option 2 - if the young person returns to school of their own volition, then the police must be informed, and procedures need to be followed.

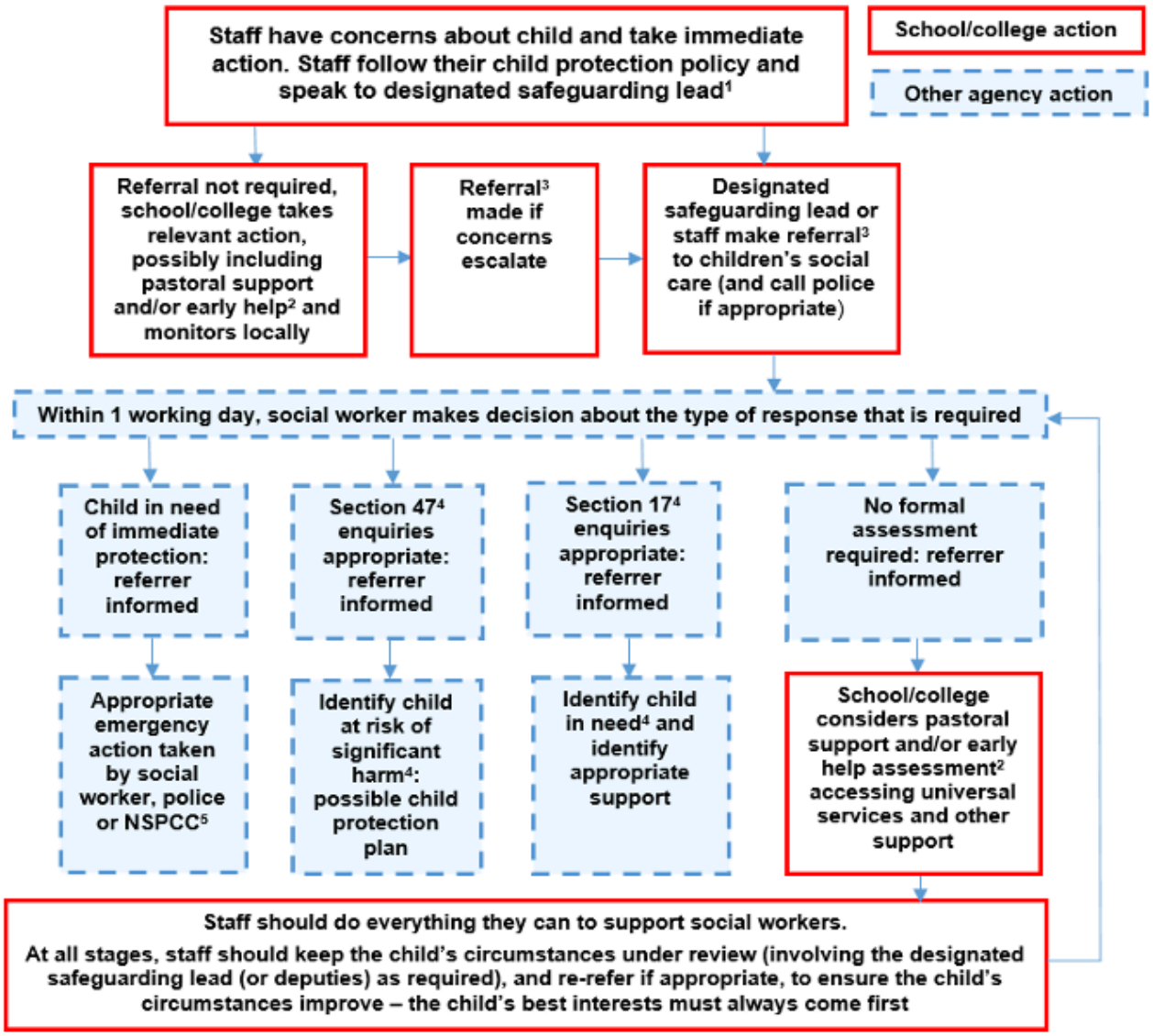
Option 3 - if the police locate the young person and bring them back to Sacred Heart the police will conduct the safe and well interview and Sacred Heart will follow school procedure.

Where a pupil has a known risk of being missing, a risk assessment for the pupil will be written and put in place.

3.7. Visitors are recorded upon arrival and departure of Sacred Heart site and follow the signing in procedure. Any pupil who needs to sign out for an appointment out of school must provide a letter from home requesting the

time out and this absence be recorded appropriately and sanctioned by a Head of Year/SLT. Evidence of the medical appointment should also be provided.

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



1 In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
2 Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.
3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.
4 Under the Children Act 1989, local authorities are 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. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.
5 This could include applying for an Emergency Protection Order (EPO).

Responses after a Request for Service is made and Responses in line with Family First Partnership Progamme (FFPP)

How Children's Services respond (summary):
Following a referral, the **C and F Hub** will review the information provided and determine the most appropriate response for the child and family. This may include:

- Providing advice, signposting or support through **Family Help/Early Help services**.
- Undertaking further assessment to determine the child's needs and the most appropriate level of intervention.
- Assessing whether the child is a **Child in Need** under Section 17 of the Children Act 1989.
- Making enquiries under Section 47 of the Children Act 1989 where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- Taking immediate protective action where a child is assessed to be at risk of significant harm.
- Working with partner agencies, including schools, health services and the police, to safeguard and promote the welfare of the child.
- The Designated Safeguarding Lead (DSL) will work collaboratively with Children's Services and other agencies, sharing information as appropriate and participating in assessments, meetings and plans to support the child.
- If the DSL does not receive confirmation that a referral has been received or acted upon, they will follow up promptly in accordance with local safeguarding procedures.

How Children's Services respond (further detail):
Where safeguarding concerns are identified, support may include:

Pastoral Support: managing support for the child internally through:
- school/college pastoral welfare and/or safeguarding support processes,
- A Request for Service is not required for support at this level
- parents/carers should be informed to further support the child's wellbeing, where this does not place the child at additional risk.

Universal Support: accessing universal services and community-based Early Help for *children with emerging needs*, including support available through:
- the school/college and
- Best Start Family Hubs, (Best Start In Life) and
- other local universal, voluntary or community services
- A Request for Service is not required for support at this level

Community-based Early Help is support for children of all ages that improves a family's resilience, improves outcomes or reduces the chance of a problem getting worse. It is not a single service, but a system of support delivered by organisations and their partners, including education providers. (***Children with emerging needs, Level 2)***

The Merton Effective Support Model describes this as '***children with emerging needs (Level 2)***':
- A Request for Service is not required for support at this level
- The Early Help Assessment Template should be used to aid discussion and allow you and the family to think about what support might be needed and to plan for next steps.
- Children at this level are usually best supported by professionals who already work with them, such as health professionals, early years settings, schools or colleges, and/or through community resources such as Family Hubs or voluntary services.
- Convene a Team Around the Family to bring together professionals working with the family. Team Around the Family Template. The Family Service Directories can be used to help to identify appropriate services and provision to meet specific needs

- Access Early Help Support Coordinators offer support and guidance to professionals[5]

Any pastoral or welfare support provided by the school/college to children and families will be recorded and reviewed. The DSL will oversee support where families are requiring additional support, to ensure that school/ college activity does not obscure potential safeguarding concerns from the wider professional network

Where the need of a child/family escalate, become persistent, or cannot be met by universal or community-based Early Help alone, the DSL will discuss with C and F Hub for further advice to improve outcomes and achievements for the child and family.

Early Help level of Family Help: Targeted early help level of family where children and families have multiple and/or complex needs, or persistent needs, which cannot be met by universal or community-based early help support alone, they may require coordinated, multi-disciplinary support to prevent escalation through the targeted early help level of Family Help.

The Merton Effective Support Model describes this as '***Family Help – Children with multiple and/or complex needs (Level 3)***'. Support at this level may include:

- targeted early help or
- statutory support under section 17 of the Children Act 1989, where required to safeguard and promote the child's welfare (can be referred to as child in need) and
- A Request for Service is required to the Children and Family's Hub

Where a child's needs cannot be met by universal or community-based early help support alone and coordinated, multi-disciplinary support may be required, or where there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm, the DSL is required to make a Request for Service to the Children and Family's Hub.

Family Help: Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and needs and risks cannot be safely managed through targeted or Child in Need Family Help support alone, a statutory child protection response is required.

The Merton Effective Support Model describes this as '***Family Help – Children in need of protection (Level 4)***'.

- If a child is at immediate risk, the Request for Support will be completed in line with process on **PAGE XX**
- A Request for Support is required and will be made to the Children and Family' Hub
- If the child is in immediate danger, emergency services will be contacted using 999

Safeguarding activity at this level is led under section 47 of the Children Act 1989 (can be referred to as Child Protection Procedures)

Sacred Heart will take appropriate safeguarding action in response to concerns but will not investigate child protection concerns as a single agency or attempt to determine whether abuse, neglect or exploitation has occurred. Staff will record and report concerns in line with this policy and MertonSCP procedures, and information will be shared with the local authority and/or the police where appropriate, so that concerns can be considered through the appropriate multi-agency process.
school/college recognises that children may be harmed in contexts outside the home, including within peer groups, the wider community and online. When making a Request for Service, the school/college will provide as much relevant information as possible so that any assessment can consider the full context of the child's lived experience and take a contextual approach to harm.

The DSL will usually have responsibility for making Requests for Service and other safeguarding referrals. However, all staff are made aware of the local authority process for making referrals to the Merton C and F Hub and for statutory assessments under the Children Act 1989, including the role they may be expected to play in such assessments.

If staff have any concerns about a child's welfare or safety, they are expected to act on them immediately.
If staff are unsure whether something is a safeguarding issue, they will speak to a DSL.

[5] Service is subject to level of education setting. To contact please email fsd@merton.gov.uk and they can advise accordingly.

If, in exceptional circumstances, a DSL or deputy DSL is not available, this must not delay appropriate action being taken. In these circumstances,

- staff should speak to a member of the school/college senior leadership team,
- consult with CandF Hub,
- contact the police where urgent action is required,
- or make a Request for Service themselves.

Any safeguarding action taken by staff must be shared with the DSL as soon as possible and records must be kept up to date.

Parents/carers will usually be spoken to where a Request for Service is being considered, and their agreement to engage will be sought where this is required and safe/appropriate to do so.

Parent/carer agreement to engage is not required for ***'Family Help – Children in need of protection (Level 4)***', where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. A Request for Service must be made in these circumstances; however, it is good practice for the school/college to work openly and transparently with parents/carers and inform them of the Request for Service where it is safe to do so.

Parents/carers will not be informed before a Request for Service is made where this may place a child at increased risk of harm, place an adult at risk of serious harm, prejudice the prevention or detection of serious crime, or undermine a criminal investigation.

SCHOOL NAME will follow MertonSCP Multi Agency Escalation Policy where we believe the request for service we made should be re-viewed and this may then include further inquiries/assessment. The Escalation Policy will be utilised **immediately** after receiving an outcome of the school's referral for request for service to ensure concerns are addressed immediately and, most importantly, that the child's situation improves.

6.9 Multi-agency working

school/college recognises the pivotal role education settings play in multi-agency safeguarding arrangements. We are committed to working in line with the Merton Safeguarding Children Partnership procedures.

school/college] leadership team, [governing body/proprietor] and DSL(s) will work to establish effective and co-operative relationships with safeguarding partners and other local agencies. This may include C and F Hub, social workers, Family Help practitioners, health professionals, mental health services, specialist teachers, educational psychologists, other education settings and the police.

school/college will work with partner agencies to provide a coordinated safeguarding response which promotes children's welfare and protects them from harm. This includes contributing to relevant multi-agency plans and meetings, such as child in need meetings, child protection conferences, core groups, strategy discussions and care planning meetings.

Where a child is supported through community-based Early Help, Family Help, child in need, child protection or care planning processes, the school/college will work with partner agencies to promote joined-up planning, avoid unnecessary duplication and ensure the child's educational needs, safety, voice and lived experience are considered.

The school/college will allow access for Merton Social Care teams and, where relevant, a placing local authority, so that they can conduct, or consider whether to conduct, assessments under section 17 or section 47 of the Children Act 1989.

When making a Request for Service or contributing to statutory assessments, the school/college will provide relevant information about the child's presentation, attendance, progress, relationships, family circumstances, wider context and any known risks outside the home, including online, peer group or community-based concerns.

The headteacher/principal and DSL are aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning. The school/college will respond in line with relevant

guidance and local procedures, including the school/college behaviour policy and/or Searching, Screening and Confiscation policy], where applicable. ***Headteachers and DSLs should access the DfE 'Searching, screening and confiscation at school' guidance.***

Type of Training	Date Completed	Renew Date
Whole School Staff - Refresher / Updates (annual)		
Whole School Safeguarding Training (due every three years)		
Senior Designated Safeguarding Lead (DSL) (due every two years)		
Deputy Senior Designated Safeguarding Leads (due every two years)		
Safer Recruitment Training (due every five years)		
Governor Training (annual)		
Advanced Designated Safeguarding Lead Prevent Training Update – to disseminate to ALL staff (annual)		

Policy	Statutory / Frequency*	Suggested Review Month(s)
Child Protection & Safeguarding	KCSIE & Working Together*	July - September
Behaviour Policy	Education Act 2002*	July - September
Health & Safety Policy	Health & Safety at Work Act*	October
SEND Policy & Info Report	SEND Regulations 2014*	September
Complaints Policy	Education Act 2002*	November
Staff Code of Conduct	Education Act 2002*	September
Online / E Safety Policy	Wellbeing & Schools Bill 2026*	October
Teachers' Pay Policy	STPCD annual update*	December
Admissions Arrangements	Admissions Code*	March
Accessibility Plan	Equality Act 2010*	November
Data Protection (GDPR) Policy	UK GDPR*	October
Drugs Education & Related Incidents	Annually	June
Safer Recruitment Policy	Every 2 years	September
Curriculum Policy	Every 2 years	January
Assessment Policy	Every 1–2 years	January
Attendance Policy	Annually	September
Anti-Bullying Policy	Annually	November
Educational Visits Policy	Every 2 years	March
Finance Policy/Scheme of Delegation	Annually	April
Staff Appraisal Policy	Annually	September
Capability Policy	Every 3 years	June
Disciplinary Policy	Every 3 years	June
Grievance Policy	Every 3 years	July
Absence & Attendance Management	Every 2 years	July
Staff Wellbeing Policy	Every 2 years	April
Fire Safety Policy	Annually	October
Crisis & Emergency Mgt. Plan	Annually	November
First Aid / Allergy Policy	Every 2 years	March
Site Security Policy	Every 2 years	March

Risk Assessment Framework	Annually	October
Fire Safety Policy	Annually	October