



TOWNLEY
— EST 1937 —
GRAMMAR SCHOOL

Child Protection and Safeguarding Policy

Contents

1. Key contacts	3
2. Referrals	3
3. School Context	4
4. Introduction	4
5. Our Principles	7
6. Early Help	9
7. Child Abuse	10
8. Reporting your Concerns	12
9. Specific Safeguarding Issues	13
10. Contact details: MASH 020 3045 5440.	16
11. If immediate and serious concerns call the police on 999	16
12. Confidentiality and Information Sharing	22
13. Record Keeping:	22
14. Allegations of abuse made against other pupils	23
15. Procedures for dealing with allegations of child-on-child abuse	23
16. Allegations against staff	24
17. Whistleblowing:	25
18. Safer Recruitment	26
19. Identity and Suitability of visitors	26
20. Attendance at Child Protection Conference	27
21. Training	27
22. Photography and images	28
23. Associate Staff	28
24. Appendix A: Signs and Indicators of Abuse	30
25. What is sexual violence and sexual harassment?	33
26. Sexual harassment	33
27. What is consent?	34
28. Female Genital Mutilation (FGM)	34
29. Appendix B: Dealing with a Disclosure of Abuse	35
30. Appendix C: Procedures if an allegation is made against a school's staff member (including volunteers and trustees)	36
31. Appendix D: Key Roles and Responsibilities Designated Safeguarding Lead (DSL)	36
32. Deputy Designated Safeguarding Lead (DDSL)	36
33. Governing Body	37
34. Appendix E: Key Messages from Local Child Safeguarding Practice Reviews	39
35. Appendix F: Full text of Keeping Children Safe in Education 2025	40
36. Appendix G: Page 24 Keeping Children Safe in Education 2025	41

1. Key contacts

Designated Safeguarding Lead	Ms L Butler
Deputy Designated Safeguarding Leads	Miss S Totty, Miss H Mitchem, Mr F De Fabiani, Mr D Rouse, Mrs H Ronan
Designated Safeguarding Officers	Mrs H Kerai, Miss E Avery, Mrs E Johal, Mrs S Irwin, Mr A Moustafa, Miss E Magee, Mrs J Greener, Miss L Drew, Ms A Kopycinska, Mr N Swart, Mrs M Brittle, Mrs H Shetty, Mrs S Hawkey, Ms R Hawkins, Mrs K Bingham, Mr White, Mrs E Pritchard, Mrs S Perfect, Mrs Siyani, Mr J Quinn and Miss F Aldridge
Designated Teacher for Looked After Children	Ms L Butler
Senior Mental Health Lead	Ms L Butler and Miss H Mitchem
Single Point of Contact (SPOC) for the Prevent agenda	Ms L Butler
Safeguarding trustee of Townley Grammar School Trust	Helen Curtis

2. Referrals

Bexley LADO: Ed Snelgar
2 Watling Street, Bexleyheath. DA5 7AT

LADO Admin 0203 045 5543, Tel: 0203 045 3436 (LADO Team)
Email: LADO@bexley.gov.uk
Email: childrens.triageteam@bexley.cjsm.net

Bexley MASH
Telephone: 0203 045 5440 Out of hours' service: 0208 303 7777
Email: ChildrensSocialCare.Admin@bexley.gov.uk
Email: ChildrensMashTeam@bexley.gov.uk
FAX: 02030455445

Greenwich MASH
Telephone: 0208 921 3172
Emergency Duty team (out of hours only): 0208 854 8888
Email: mash-referrals@royalgreenwich.gov.uk

Kent MASH
Telephone: 0300 0411111
mail: social.services@kent.gov.uk Out of hours 03000 41 91 91

The NSPCC whistle-blowing helpline number: 0800 028 0285

Prevent Duty

Clair McGarry Tel: 020 3045 3990 / 07815 708562

Email: Clair.McGarry@bexley.gov.uk / community.safety@bexley.gov.uk

National police Prevent advice line

Tel: 0800 011 3764

CAMHS Bexley Crisis Line:

Telephone: 0203 228 5980- Monday- Friday 5pm- 10pm. Saturday- Sunday
9am-10pm Oxleas Urgent Advice Line: 0800 330 8590

Bexley Virtual School Headteacher

Rosemarie Zaubzer, Head of Virtual School
Telephone 0203 045 4141

Email: rosemarie.zaubzer@bexley.gov.uk

Simone Shah - Secondary & Post 16 Phase Leader – Telephone: 020 3045
3438

3. School Context

Townley Grammar School is a multicultural, selective girls' school on the outskirts of Kent and South East London. Our students come from a wide range of boroughs and local authorities and experience the challenges and successes that life close to the Capital brings. We understand that the safeguarding needs facing our students include issues relate to sexism, racism and the specific types of risks linked to the local area. We also recognise the significant challenges students face with Social, Emotional, and Mental Health (SEMH) and the particular risks associated with issues around eating, given the pressures on young adults. This includes a need in our school for a heightened awareness of gang-related crime and exploitation, risks of extremism, Female Genital Mutilation and Child Sexual Exploitation as well as all the other risks that are outlined by Keeping Children Safe in Education. We recognise that all four types of abuse affect children from all backgrounds. In and out of school we take bullying and the risks of this for those who are homeless, in care and disabled, very seriously; we are committed to working with local partners to continue to develop our robust approach to safety and the safeguarding of children. We will never think that 'we are done' with our safeguarding processes, we will commit to ongoing learning about all aspects of safeguarding that could affect our school staff and students.

4. Introduction

Section 175 of the Education Act 2002 places a duty on local authorities in relation to their education functions, the governing bodies of maintained schools and the governing bodies of further education institutions (which include sixth-form colleges) to exercise their functions with a view of safeguarding and promoting the welfare of children who are either pupils at a school or who are students under 18 years of age attending further education institutions.

The same duty applies to independent schools (which include academies and free schools) by virtue of regulations made under Section 157 of this Act.

In order to fulfil their duty under Sections 157 and 175 of the Education Act 2002, all educational settings to whom the duty applies, should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children.

All schools should give effect to their duty to safeguard and promote the welfare of their pupils under the Education Act 2002 and, where appropriate, under the Children Act 1989 by:

- Creating and maintaining a safe learning environment for children and young people
- Identifying where there are child welfare concerns and acting to address them, in partnership with other organisations where appropriate

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

This policy develops procedures and good practice within our school, to ensure that there is an understanding of the duty to safeguard and promote the welfare of all children and young people including those who are vulnerable. We endeavour to provide a safe and welcoming environment where children and young people are respected and feel valued. It provides evidence of how this will be implemented within our school and within multi- agency working arrangements.

This policy has been read by all staff and signed to the effect that they have read, understood and will act upon it.

The policy will be accessible to all visitors to the school, parents and carers through the school's website and a hard copy will be available from the school office.

Meeting your communication needs

We want to ensure that your needs are met. If you would like this information in audio type, in Braille, large print, any other format or interpreted in a language other than English, please contact admin@townleygrammar.org.uk and we will aim to meet your needs.

Terminology

- **Child**- includes everyone under the age of 18 years old.
- **All staff** – refers to all those staff working for or on behalf of the school, full time or part time, permanent or temporary, in either a paid or unpaid capacity. Where this includes those employed in a voluntary capacity, this will be identified.
- **Parent** – refers to birth parents and other adults in a parenting role, for example step parents, foster carers, and adoptive parents, any other person(s) who have legal parental responsibility for a child.
- **Governing Body** – refers to all forms of governance within the trust.
- **Safeguarding** - refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.
- **Child protection** - refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

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

Acronyms used in this policy

DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead MASH Multi Agency Safeguarding Hub
CSE	Child Sexual Exploitation
FGM	Female Genital Mutilation
KCSIE	Keeping Children Safe in Education
BEXLEY SP	Bexley Safeguarding Partnership
LADO	Local Authority Designated Officer
EIT	Early Intervention Team
LAC	Looked After Children

Key Documents

This is an overarching policy and should be read in conjunction with the following documents:

- 'Keeping Children Safe in Education' (September 2025), which is the statutory guidance for Schools and Colleges.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM. Multi agency Statutory Guidance on Female Genital Mutilation (pages 59-61 focus on schools).
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Trustees and Headteacher should carefully consider how they are supporting

their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- ['Working Together to Safeguard Children'](#) (revised December 2023), which is statutory guidance to be read and followed by all those providing services for children and families, including those in education.
- ['What to do if worried a child is being Abused: Advice for Practitioner'](#), March 2015.
- ['Information Sharing: Advice for Practitioners providing Safeguarding Services to Children, Young People, Parents and Carers'](#), May 2024.
- [When to call the police: Guidance for Schools and Colleges](#) (Child Centred Policing).
- [Children Missing Education – Statutory guidance for local authorities](#), August 2024.
- [Child Sexual Exploitation](#), published Feb 2017.
- Furthermore, we will follow the procedures set out by: Bexley Safeguarding Partnership for Children and Young People which can be found at <https://bexleysafeguardingpartnership.co.uk/>

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

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

This policy should also be read in conjunction with the following policies linked to safeguarding within the school which can include:

- Anti-bullying including Cyber Bullying Policy
- Health and Safety Policy Email Internet Policy (for staff)
- E-safety Policy
- Computer Access Usage Policy
- Code of Conduct Policy
- Data Protection Policy
- Disability and Accessibility Policy
- Equal Opportunities Policy
- Keeping Children Safe from Extremism Policy
- Positive Behaviour Policy
- Recruitment and Selection Policy
- Visitors' Policy and Procedures
- Whistleblowing Policy
- Supporting Pupils with Medical Needs Policy
- Adherence to Local Safeguarding Procedures, which include the London Safeguarding Children Procedures and any specific procedures for the young person's borough of residence.

5. Our Principles

The purpose of this policy is to provide a secure framework for all staff in safeguarding and promoting the welfare of those pupils who attend our school. Our school recognises that the safety and welfare of children is paramount and that we have a responsibility to protect children in all of our school's activities.

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

We take all reasonable steps to ensure, through appropriate procedures and training, that all children, irrespective of sex, age, disability, race, religion or belief, sexual identity or social status, are protected from abuse. We will seek to:

- Create a safe and welcoming environment where children can develop their skills and confidence.
- Support and encourage other groups and organisations to implement similar policies through collaboration with attendance of local Designated Teacher Forums.
- Recognise that safeguarding children is the responsibility of everyone, not just those who work with children.
- Ensure that any training or events are managed to the highest possible safety standards.
- Review ways of working to incorporate best practice. Through feedback and evaluation of CPD and training including this policy being regularly reviewed at least once per year by the Safeguarding Leads for the school.
- Treat all children with respect regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.
- Carefully recruit and select all employees, contractors and volunteers by using DBS processes, safer recruitment processes and seeking references as well as ensuring that Safeguarding is a primary element of all staff and volunteer induction.
- Respond swiftly and appropriately to all complaints and concerns about poor practice or suspected or actual child abuse.
- Share information about concerns with agencies who need to know, involving parents and children appropriately.
- Our school maintains an attitude of 'it could happen here' at all times.

Key elements to this policy

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

- Establishing positive, supportive, secure working practices that put children first.
- Ensuring we practice safer recruitment in checking the suitability of all staff who work in our school, conducting online background checks on staff when recruiting and Senior Leaders trained annually in Safer Recruitment.
- Keeping child protection issues at the forefront of our work and who has roles of responsibility regarding safeguarding in the school.
- Ensuring that all staff implement procedures for identifying and reporting cases, or suspected cases of abuse and regularly reviews them.
- Supporting children and young people in accordance with their agreed Child Protection/Child In Need.
- We will follow the procedures set out by the BEXLEY SCP and take account of all guidance issued by the DfE, OfSTED and other significant bodies.
- Ensure we have a DSL and an extended safeguarding team in relation to the size of the school who have received appropriate training and support for their role (see training section).
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences, if appropriate.
- Keep organised and secure records of concerns about “vulnerable” children including chronologies, even where there is no need to refer the matter immediately. This includes the use of any screening tool that aids identification of Child Sexual Exploitation (CSE), Radicalisation, Female Genital Mutilation (FGM), on-line use or other such issues and that such records are securely placed.
- Follow procedures where an allegation is made against a member of staff or student and that such procedures are robust to deal with any allegation and that clear records of investigations and outcomes of allegations are held on staff files.
- Risk-assess any off-site activity, led by the school.

6. Early Help

There are situations which may occur in a family's life where they may benefit from additional support that cannot be provided solely by universal services. These can include when a child:

- Is disabled and has specific additional needs
- Has Special Educational Needs (EHCP plan)
- Is a young carer
- Has a mental health need
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups/county lines
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is a privately fostered child
- Is misusing drugs or alcohol themselves
 - Is at risk of modern slavery, trafficking, sexual or criminal exploitation
 - Is frequently going missing from care or from home
 - Is at risk of “honour-based” abuse such as FGM or Forced Marriage
 - Is showing early signs of abuse and/or neglect
 - Is showing signs of displaying behaviour or views that are considered to be extreme
 - Is persistently absent from education, including persistent absence for part of the school day

These children are therefore more vulnerable; this School will identify who their vulnerable children are, ensuring **ALL** Staff and trustees know the processes to secure advice, help and support where needed. In the first instance, a discussion should take place with the safeguarding team and a record kept of this discussion. If further advice is needed or the school wishes to make a referral, then they would contact the Early Intervention Team.

Additional guidance can also be accessed by using the BEXLEY SCP multi agency threshold document.

Townley Grammar School supports children who live in a number of Kent, Thurrock and London Boroughs outside of Bexley. When a child requires additional safeguarding services such as 'intensive' or 'Specialist' services the respective MASH teams and CSC will be communicated in line with the 'home borough's' protocols.

The Early Intervention Team (EIT) works with Bexley schools supporting children aged 3 to 18 who need extra help to thrive and progress in school. The team's role is to provide additional support to referred children who have Special Educational Needs (SEN) or Additional Educational Needs (AEN), and advice and training to school staff.

The team is staffed by the following specialists:

- Team managers
- Educational Psychologists (EPs)
- Social Emotional Mental Health (SEMH) Support Teachers
- Social Emotional Mental Health (SEMH) Support Assistant
- AEN/SEN Partner
- SEN Strategic Support Partners
- Representative from the Mental Health Services (MHST)

The EIT support schools with the following:

- children who are failing to thrive or make progress in school because of issues with special educational needs, or social emotional difficulties
- children whose lack of progress at school stems from a number of different factors that should be addressed in a co-ordinated way
- support the school to offer the right support at the right time to students
- help schools and teaching staff with problem-solving
- at times working with parents and carers
- provide specialist guidance and support where this is needed which will, at times, include training for school staff

As well as supporting children and families in terms of early intervention, team members will also:

- support the Education Health Care Plan (EHCP) process for individual children and young people
- support the work with children at risk of exclusion
- support pre-school children and individual students who present complex educational needs with complex needs through the educational psychology service where deemed appropriate by all professionals involved in the young person's education.

Contact details

Email: earlyintervention.team@bexley.gov.uk

Website: <https://www.bexley.gov.uk/services/schools-and-education/early-intervention-education-eit>

In case of emergency schools should contact the EIT manager: **L Bakker at the email address above**

First Aid and Medical Plans:

Except in cases of emergency, first aid will only be administered by Qualified First Aiders. All first aid treatment will be recorded and where significant will be shared with parents/carers at the earliest opportunity.

First Aid training emphasises that clothing should be removed only when absolutely necessary. In situations where the removal of clothing could pose a safeguarding concern, it is advisable to have two staff members present. While only one of them needs to be trained in first aid, it is crucial to prioritise the child's safety. If waiting for a second staff member puts the child's life in immediate danger, the first aider should not delay treatment.

Curriculum:

Townley Grammar School acknowledges the pivotal role that the curriculum can play in teaching children to keep themselves safe in, for example, the prevention of abuse and in the preparation of our pupils for the responsibilities of adulthood and citizenship. We ensure all pupils are taught about safeguarding, including online safety, through our Character and Wellbeing curriculum, Computer Science lessons, assemblies linked to our school values and safeguarding days calendared throughout the year.

It is expected that all curriculum leaders will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. The curriculum includes teaching regarding wellbeing (including Relationships and Sex Education) and online safety. The curriculum will be used to build resilience, raise awareness of how to keep safe and ensure all students know how to ask for help if their safety is threatened.

7. Child Abuse

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

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

Staff, volunteers and trustees must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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, 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.

Signs and indicators which may assist in the identification of some forms of abuse can be found in **Appendix A**.

Physical Abuse

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

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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.

Sexual Abuse

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 (see paragraph 48).

Neglect

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

It may include a failure to:

- Provide adequate food, clothing and shelter
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers), or
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to a child's basic emotional needs

If you are to refer a child or young person because of possible neglect, always check back to see if there have been any previous concerns. The Children Act 1989 talks about how the persistent neglect of very basic needs is likely to cause impairment in the child or young person's development.

Bullying

Bullying and forms of bullying including prejudice based and cyber bullying is also abusive which will include at least one, if not two, three or all four, of the defined categories of abuse (refer to the Anti Bullying Policy).

8. Reporting your Concerns

In the first instance, if a member of staff has a concern about a child they should report this immediately to the school's Safeguarding Team via MyConcerns. The Safeguarding Team may well have information that other members of staff do not know about a child and their family. Staff should be told on a 'need to know basis' (see confidentiality Section 7).

However insignificant you think your concern might be, pass it on to the Safeguarding Team. It may only be a small bit of information but it helps to form a bigger picture. All staff will be trained in their school procedures at least once per year in September and will be regularly updated on any changes through whole staff briefings. This includes how to use documentation, report safeguarding concerns on My Concerns as well as when to call the police.

If the DSL extended safeguarding team are not available

Bexley

If there is an immediate concern about a child or their family **any member** of staff can phone the MASH/MASH for advice and guidance if the DSL/DDSL are not available.

You can also report your concerns to the Headteacher.

Contact details:

MASH 020 3045 5440

If the concerns arise out of office hours contact 020 8303 7777 or 020 8303 7171

- If they are unsure they can contact MASH for advice and guidance.
- This should always be logged using the school procedure for reporting safeguarding.

Contacting MASH (for advice or when making a referral)

It is the role of the DSL to make referrals appropriate to the needs of the children in their school. The DSL can deputise and seek administrative support from other members of the extended safeguarding team and school staff.

In the event of making a referral ensure that you have as much factual information about the child as possible when you phone include:

- Full name
- D.O.B
- Address

- Family composition details (including names of parent(s) and siblings)
- Any key professionals working with the school
- Factual information about the concerns you have

Making a referral in writing

You will need to back any phone call up in writing by completing the multi-agency referral form. Below are the details for the Local Authorities most commonly 'home boroughs' to our cohort':

For Bexley this is available

<https://www.bexley.gov.uk/services/health-and-social-care/social-care-for-children/reporting-concerns-about-child/worried-about-child> You must then send it in by secure email which is clearly highlighted on the referral form.

MASH Secure email: Childrensocialcare.admin@bexley.gcsx.gov.uk

For Kent this is available where you can fill in a request for Support form and send it to their virtual "front door" <https://kccchildrens.kent.gov.uk/web/portal/pages/home>

For Greenwich this is available

https://www.royalgreenwich.gov.uk/info/200237/family_support_and_safeguarding_children/956/report_your_concerns_about_a_child and send it to mash-referrals@royalgreenwich.gov.uk

For Lewisham this is available here

<https://lewisham.gov.uk/myservices/children-and-young-people-service/keeping-children-safe/content/request-help-or-protection-for-a-child>

Informing Parents / Carers

The school should ensure they have spoken to the family about their concerns and proposed actions unless to do so would place the child at risk or when in exceptional circumstances; the decision not to inform parents/carers must be justified and the details recorded. If a child makes a disclosure or presents with an injury, it is imperative that advice is sought immediately prior to the child returning home and as soon as the school becomes aware of this.

Resolution of Professional Differences

In the event that the school disagrees with the actions or decisions of another agency the school will consider using the Resolution of Professional Differences policy also referred to as the escalation policy. The policy is available via the following link:

<https://bexleysafeguardingpartnership.co.uk/wp-content/uploads/2020/08/resolving-professional-differences.pdf>

<https://bexleysafeguardingpartnership.co.uk/for-professionals/resolving-professional-differences-escalation-of-issues/>

If the Child/Family are already known to Social Care

When a member of staff, parent, practitioner, or another person has concerns for a child, and the school are aware that the case is already open to social care then they should contact the allocated worker. If they do not know the name of the worker, they can contact MASH/MASH who will provide contact details of the worker and/or their manager. Any correspondence with the allocated worker should be recorded on My Concerns.

9. Specific Safeguarding Issues

Specific safeguarding issues

All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately absent from education and sexting (also known as youth produced sexual imagery) put children in danger.

All staff must be aware that safeguarding issues can manifest themselves via **child on child abuse**. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- up-skirting
- initiation/hazing type violence and rituals.

All staff must be clear as to the school's policy and procedures with regards to Child on Child abuse.

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

Children's social care assessments should consider such factors so it is important that the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: <https://contextualsafeguarding.org.uk/toolkit>

Annex B of KCSIE (September 2025)

Child Sexual Exploitation (CSE)

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

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

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and

- is typified by some form of power imbalance in favour of those perpetrating the abuse.

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.

Some of the following signs may be indicators of child sexual exploitation:

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

All suspected or actual cases of CSE are a Safeguarding concern in which Child Protection procedures must be followed; this will include a referral to MASH and where the risk is immediate to the police. If any staff are concerned about a pupil, they will refer to the Designated Safeguarding Lead/s and the CSE lead within the School.

<https://www.rip.org.uk/resources/publications/practice-tools-and-guides/child-sexual-exploitation-practice-tool-2017-open-access>

Potential indicators of CSE are contained within Appendix A.

Radicalisation/PREVENT/ Extremism

Townley Grammar School will ensure **ALL** staff including trustees adhere to their duties in the Prevent guidance 2023 to prevent radicalisation

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence
Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

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

Terrorism is an action that:

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Headteacher and Chair of Trustees will:

- Establish or use existing mechanisms for understanding the risk of extremism
- Ensure staff understand the risk and build capabilities to deal with issues arising
- Communicate the importance of the duty
- Ensure **All** Staff and Trustees implement the Prevent duty
- Ensure the risks of Radicalisation are referred to within all relevant policies including visitors anti bullying and e-safety

Schools within Townley Grammar School trust will respond to any concern about Radicalisation/Prevent as a Safeguarding concern and will report in the usual way using local safeguarding procedures for the child's Local Authority. We will seek to work in partnership with social, health and police agencies in undertaking risk assessments where appropriate and proportionate to risk, building our children's resilience to radicalisation.

When reviewing our PREVENT duties we would consider the guidance contained on the Bexley website <https://www.bexley.gov.uk/services/community-safety-and-environment/prevent/what-prevent>

What can we do to help our children understand these issues and help protect them?

- Provide a safe space for them to debate controversial issues
- Help them to build resilience and the critical thinking they need to be able to challenge extremist arguments
- Give them confidence to explore different perspectives, question, and challenge

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

The school is committed to providing effective filtering systems and this will include monitoring the activities of children when on-line in the school. Please refer to the school's e-safety policy.

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

Bexley Prevent / Community Safety Services

Clair McGarry Tel: 020 3045 3990 / 07815 708562

Email: Clair.McGarry@bexley.gov.uk / community.safety@bexley.gov.uk

National police Prevent advice line

Tel: 0800 011 3764

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

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

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

Additional contact details

Concerns regarding extremism can be discussed with Channel, the Bexley safeguarding panel which supports prevent

Community.safety@bexley.gov.uk or call 0209 303 7777

10. Contact details: Bexley MASH - 020 3045 5440.

If the concerns arise out of office hours contact 020 8303 7777 or 020 8303 7171

If immediate and serious concerns call the police on 999

Female Genital Mutilation (FGM)

Townley Grammar School recognises and understands that there is now a mandatory reporting duty for all teachers to report to the police where it is believed an act of FGM has been carried out on a girl under 18 in the UK. Failure to do so may result in legal/disciplinary action being taken. All suspected or actual cases of FGM are a Safeguarding concern in which safeguarding procedures will be followed; this will include a referral to the police and to Children's Social Care via MASH. If any staff are concerned about a pupil, they will refer to the Safeguarding Designated Lead/s within the School unless there is a good reason not to do so.

Potential indicators of FGM are contained within Appendix A.

Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through our safer schools officer with the metropolitan police.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 13 of this policy also apply to recording these incidents.

Curriculum coverage

The below is provided as an example of how you might demonstrate the way your curriculum covers the sharing of nudes and semi-nudes. Insert details of your own approach here.

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- Teaching follows best practice in delivering safe and effective education, including:
- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Child on Child Abuse

All staff should be aware that safeguarding issues can manifest themselves via Child on Child abuse. The reasons for this are complex and are often multi-faceted. We understand that we need as a school to have clear procedures in place to identify and report incidents or concerns. We aim to reduce this behaviour and

any related incidents with an expectation to eliminate this conduct in the school. We do this through staff training in the delivery of Character and Wellbeing and Relationships and Sex Education. We do this through our behaviour policy and its communication to children in writing and in our daily interactions with them.

Child on Child abuse is a Safeguarding concern and will require a discussion with the DSL who will seek advice from agencies and professionals including reference to the safeguarding procedures. This will involve in the first instance having a conversation with MASH.

Child on Child is most likely to include, but may not be limited to:

- Language seen as derogatory, demeaning, inflammatory
- Bullying, including cyberbullying
- Gender based violence
- sexual assaults and harassment
- sexting
- Abuse in intimate personal relationship between children
- Physical abuse (including an online element which facilitates, threatens or encourages physical abuse)
- Causing someone to engage in sexual activity without consent

Consensual or non-consensual sharing of nudes and semi nudes images/videos The school is working hard to be proactive and to challenge this type of abuse. We aim to use approaches in the curriculum to address and tackle Child on Child abuse. Please refer to the Anti Bullying, Equal Opportunities and E-safety policies.

It is important school staff (and especially Designated Safeguarding Leads and their Deputies) understand consent. This will be especially important if a child is reporting they have been raped.

It is also important that all staff are aware:

- Of the importance of never tolerating or dismissing Child-on-Child abuse as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.
- Of challenging behaviours
- That dismissing or tolerating such behaviours risks normalising them

Reporting sexual violence or sexual harassment:

A victim should never be made to feel ashamed for making a report and should be reassured they are being taken seriously, and that they will be supported and kept safe. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from page 22 in Part 1 of KCSIE September 2025 guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the Designated Safeguarding Lead (or a Deputy). Where a report has been made of sexual violence the DSL will make an immediate needs and risk assessment. It is likely that professional risk assessments by social workers and or sexual violence specialists will also be completed.

The risk assessment will consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s); and
- All the other people involved, (children, adult students and staff) at the school, any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

All reports will be managed on a case-by-case basis which will lead to one of the four outcomes:

- Case managed internally through the behaviour system with pastoral support
- Early help support provided for victim and perpetrator
- Referral to Children’s Social Care
- Reporting to the Police (alongside a report to CSC)

When to call the police:

The NPCC have released guidance for schools on Child Centred Policing and we use this guidance and the framework for reporting to help us decide how and when to involve the Police in school related incident
The full guidance can be accessed at:

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

For further information on Sexual Violence or Sexual Harassment between young people and children. See Annex A

Children with special educational needs and disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

The individual needs of every special educational needs or disabled child will be reviewed regularly and consideration given to any additional vulnerabilities they may have which could lead to safety and welfare concerns arising.

Should any concerns arise in relation to any child in relation to their safety and welfare, Townley Grammar School will follow the same procedures as outlined within this policy and liaise with the safeguarding team initially.

E-safety/Online safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Townley Grammar School takes online safety very seriously both in terms of our pupils and all of our staff. Please also refer to Townley Grammar School's E-safety Policy and the email internet policy for staff. Townley Grammar School will communicate with stakeholders regarding new apps and online safety.

Mobile phones, laptops, iPads, and other on-line type products are integrated into all our lives. Many are used within our school. However, there are those that seek to use these for their own or other's gratification. The link below provides more information on on-line safety and cover issues such as:

- Bullying, including online bullying and prejudice-based bullying, racialisation and/or extremist behaviour
- Child sexual exploitation and trafficking
- The impact of new technologies on sexual behaviour, for example sexting
- <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/>
- To address this, our school aims to:
 - o Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Governors
 - o Protect and educate the whole school community in its safe and responsible use of technology,

- including mobile and smart technology (which we refer to as 'mobile phones')
- o Promote online safety via digital leaders and social media awareness events
- o Set clear guidelines for the use of mobile phones for the whole school community
- o Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Filtering and Monitoring

Townley Grammar School is adhering to the guidance within the KCSIE (September 2025 para 140) and this is reflected within our E-safety policy.

We use both LGFL Webscreen for web filtering and LGFL HomeProtect. Webscreen covers all machines whilst on site and HomeProtect covers the students' Chromebooks whether they are onsite or not.

Artificial intelligence (AI)

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

Townley Grammar School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Townley Grammar School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and Behaviour and Culture policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>
<http://www.safelives.org.uk/>

<https://www.operationencompass.org/>

The school is signed up to Operation Encompass which is a partnership between the Police Force and schools to prevent domestic violence and reduce its effects on children and young people. The first step for Operation Encompass was the commitment that Police Forces report to a designated person in each school, details of ANY incident of reported Domestic Violence in a child's home is reported, not just those where an offence can be identified. Townley Grammar's named links for Operation Encompass are:

Ms L Butler and Miss S Totty

Children Absent from Education

Attendance, absence and exclusions are closely monitored. A child absent from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The attendance team will monitor absence and take appropriate action including notifying the safeguarding team, Education Welfare Service, local authority and following local procedures, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Our attendance teams work in close liaison with the Extended Safeguarding Team and consider attendance concerns will be considered an early indicator of safeguarding concerns.

EHE- Elective Home Education

We will advise the Local Authority of when children leave our school to be electively home educated at the earliest opportunity. Prior to the agreement of the EHE a meeting will be held with the family, school and Local Authority Education Welfare Officer to ensure the best interests of the young person are taken into consideration. A Safeguarding Risk Assessment will be completed and shared with the Education Welfare Service.

Reduced Timetables

Should a reduced time table be instigated or be necessary, guidance will be reviewed with the aim the child returns to school full time at the earliest moment or other provision sought to ensure the child/ young person has their full entitlement. A Safeguarding Risk Assessment will be completed and shared with the Education Welfare Service. The school will also monitor this using our own internal systems for reviewing the use of reduced timetables.

Looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. KCSIE (September 2025 para 189).

A designated LAC lead has been appointed from the senior leadership team. In Townley Grammar School, this person is currently:

Ms L Butler

The designated Looked After Child lead will ensure that appropriate staff (such as a House Tutor, Learning Manager or SENCo) have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They are also responsible for ensuring that they also have information about the child's care arrangements and the levels of authority delegated to the carer by the local authority looking after him/her.

The designated children in care lead will have details of the child's social worker, this is saved on the young persons MyConcern profile. Contact information for the Social Worker's Manager and Duty team is also recorded when known. They will have drawn up an individual Personal Education Plan with Bexley Virtual School or the corresponding Local Authority virtual school for those outside of the borough.

Young Carers

As a school we recognise the needs of young carers in that they can be more vulnerable or placed at risk. We aim to be able to identify young carers and ensure they are supported to help reach their potential with an understanding that staff and volunteers may need to refer into early help services for an assessment of their needs via the Early Intervention Team. We do this via admissions documentation and also seek extended support via local charities that support Young Carers.

Forced Marriage

The UK Government describe this as taking someone, usually overseas, to force them to marry (whether or not the forced marriage takes place) or marrying someone who lacks the mental capacity to consent to the marriage (coercion may include physical, psychological, financial, sexual and emotional pressure). It may also involve physical or sexual violence and abuse. However, the choice of whether or not to accept the arrangement remains with the prospective spouses. Children may be married at a very young age and well below the age of consent in England.

All staff should be particularly alert to suspicions or concerns raised by a pupil. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

If at any time the school had a concern regarding a child who this may apply to immediate contact will be made with MASH/MASH for guidance and advice.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmv@fcdof.gov.uk

Private Fostering

A private fostering arrangement is when a child is cared for consecutively for 28 days or longer by someone who is not a member of that child's immediate family. In such a case the local authority should be informed.

If the school is aware of such an arrangement being in place they must advise the family that the school have a responsibility to inform the local authority and encourage the family to advise the local authority themselves.

Advice or a referral can be made via MASH.

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. They should pass on concerns/reports to the Safeguarding Team.

Pupils who are lesbian, gay, bisexual Gender questioning

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

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Pastoral Support is available from the Pastoral Hub, House tutors or via Pride Alliance who meet weekly.

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

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability.

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

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

We will adhere to any revised guidelines issued by the Department for Education.

Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs. Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being 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 children's social care where a child has been harmed or is at risk of harm.

The link to the Bexley Housing Support and homelessness website is:

<https://www.bexley.gov.uk/services/housing>

Further contact details are available here:

<https://www.bexley.gov.uk/sites/default/files/2022-09/Housing-support.pdf>

Child criminal exploitation: county lines and money laundering

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

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

A money mule is someone recruited by criminals to transfer the profits of their illegal activities. The money may have been stolen directly from another bank account or may be the profits of fraud, drug trafficking, child labour or prostitution.

Although some money mules know that they are handling stolen money, criminals also target groups such as vulnerable students to unwittingly laundering the funds on their behalf.

Like other forms of abuse and exploitation, child criminal exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

<https://www.fearless.org/en/campaigns/county-lines>

<https://www.moneymules.co.uk/>

Potential indicators of CSE are contained within Appendix A

Use of the school premises for non-school activities

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to Townley Grammar School or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

11. Confidentiality and Information Sharing

Confidentiality needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. No adult must ever guarantee confidentiality to any individual including parents, children and colleagues. Staff should make children aware that if they disclose information that may be harmful to themselves or others, then certain actions will need to be taken.

Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or in the best interest of the child or young person, e.g., where safety and welfare of that child or young person necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. 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 children. The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children 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 is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt. The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information (including personal information), and we refer to this in order to support staff who have to make decisions about sharing information.

If the information given relates directly to the safety and welfare of a child, then the DSL must be informed immediately. They should then contact MASH.

12. Record Keeping:

Well-kept records are essential to good safeguarding and child protection practice. We are clear about the need to record any concerns held about children or young people, the status of such records, and, when these records should be passed over to other agencies. We will hold records in line with our records retention schedule. Records are logged on MyConcern.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely, in a locked location and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained until the young person reaches the age of 25. Some documentation will be shared with onward education establishments such as sixth form colleges and therefore further contact may need to be made with other attended establishments after they have left the school. We retain the file for a year following transfer in case any issues arise because of the transfer.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this will be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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 child.

13. Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual

assault, up-skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

14. Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

15. Allegations against staff

There are two levels of allegation, 'Low Level Concerns' and allegations which reach the 'harms' threshold. All *Low Level Concerns* will be reported to the Headteacher. These can include the examples below, but are not limited to;

- Having favourites
- Using inappropriate or offensive language
- Being one-to-one with a student behind a closed door
- Taking pictures of students

The Headteacher will then establish the circumstances and facts before evaluating if it meets the 'threshold of harms' to refer to the LADO.

Allegations against staff are covered in all basic training and induction training that takes place within our school.

Allegations by a child or young person against a member of staff must never go unrecorded or unreported, including any made against you. If you receive a disclosure, about an adult colleague, it is important to reassure the child that what he says will be taken very seriously and everything possible done to help.

In all instances the Headteacher must be informed. If the Headteacher is not available, then the DSL should be advised.

If the allegation concerns the Headteacher, then the Chair of the Trust must be informed.

In all situations regarding an allegation of abuse against a member of staff/volunteer/trustee the school must not act alone and must seek advice and make a referral where necessary.

In such circumstances our DSL, Headteacher, or Chair of the Trust Board will:

- Contact the LADO for advice
- consider the safeguarding arrangements of the child or young person to ensure they are not in

- contact with the alleged abuser
- contact the parents or carers of the child/young person if advised to do so by the LADO
- consider the rights of the staff member for a fair and equal process of investigation
- ensure that the appropriate disciplinary procedure is followed, including whether suspending a member of staff from work until the outcome of any investigation is deemed necessary
- act on any decision made in any Allegations Against Staff and Volunteers meeting and
- advise the Disclosure and Barring Service (DBS) and any other appropriate regulatory or professional body where a member of staff has been disciplined or dismissed as a result of the allegations founded, or would have been if they have resigned

Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. Allegations regarding a supply teacher should be reported directly to the LADO who will make contact with the Supply Agency directly. If the concerns/allegations are about the headteacher, speak to the chair of governors.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Contact details LADO:

Email: LADO@bexley.gov.uk

Email: childrens.triageteam@bexley.cjsm.net Tel:
020 3045 5645 (LADO Admin)

Referring to the police

If it is necessary to refer an incident to the police, this will be done through our safer school sergeant with reference to the data sharing agreement with the metropolitan police. A signed copy is stored with the Headteacher and DSL.

16. Whistleblowing:

Please refer to the Trust's Whistleblowing Policy.

Whistleblowing Trustee: Helen Curtis

In the event that you do not feel able to follow the schools whistle blowing policy but remain concerned you must discuss your concerns with an appropriate independent body. In this situation you could contact:

NSPCC Whistleblowing helpline: 0800 028 0285

Key Safeguarding Roles and Responsibilities: (see Appendix D)

Designated Safeguarding Lead (DSL)

There is a legal obligation under the Education Act 2002 S175/157 for all schools to have a designated safeguarding lead. Townley Grammar School follows the guidance in Annex C of KCSIE (revised September 2025 pg 171 Annex C) which outlines the key responsibilities of the DSL.

Deputy Designated Safeguarding Lead (DDSL)

As above we follow the guidance in Annex C of KCSIE (revised September 2025) which outlines the key responsibilities of the DSL and DDSL.

Governing Body including the role of the Safeguarding Governor

The roles and responsibilities of the governing body are outlined in Part 2 of KCSIE (revised September 2025). In addition, responsibilities are set out in Appendix D in this document.

17. Safer Recruitment

Townley Grammar School operates safer recruitment procedures including making sure that:

- statutory duties to undertake required checks on staff who work with children are complied with in line with the Disclosure and Barring Service requirements for Regulated Activity; Teachers' Prohibition Orders; the Child Care Act 2006 and Childcare (Disqualification) Regulations 2009
- statutory guidance relating to volunteers is followed
- at least one member of the recruitment panel members has undertaken safe recruitment training through an accredited training programme
- ensuring the correct pre- appointment checks are carried out
- all offers of appointment are conditional until satisfactory completion of the mandatory pre-employment checks
- further checks are carried out for potential new staff that have lived or worked outside of the UK. These checks could include, where available; criminal records check for overseas applicants- Home Office guidance found on Gov.uk. Obtaining a letter (via the applicant) from the professional regulating authority in the country/countries which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are of any reason why they may be unsuitable to teach.

We are aware that not all countries provide criminal record information, and where they do, the nature and detail of the information provided may vary from country to country. We are also mindful that the criteria for disclosing offences in other countries often has a different threshold than those in the UK. The Home Office provides guidance on Criminal Records checks for overseas applicants which can be found on Gov.uk

We hold a Single Central Record (SCR) which demonstrates we have carried out the range of checks required by law on our staff. Our school complies with the requirements of KCSIE, September 2025 - Part 3 para 209

Our school complies with the requirements of the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009.

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

18. Identity and Suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's lanyard.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

19. Attendance at Child Protection Conference

If a child or young person becomes the subject in a Child Protection Conference as a school, we may be asked to share information about the child or young person and his/her family. Usually this will be in the form of a written report, the contents of which will be shared with parents/carers prior to the meeting.

Child protection conferences will be attended by the DSL or DDSL. In exceptional circumstances another member of staff may attend with them. The reason this responsibility is not delegated is because the DSL and DDSLs have the overall training and accountability to act on behalf of the school including agreeing their role in any child protection plan as well as the possible allocation of resources.

Occasionally, there may be information which is confidential and which will be shared in a closed meeting prior to the conference. If this is necessary, the chair of the conference will discuss the matter with parents/carers beforehand.

When any child becomes the subject of a conference, local procedures require that all other children in the family are considered. It may well be that staff will be required to provide information on children with whom there appear to be no direct concerns.

Staff may contribute to the process of risk assessment and the decision about the child being in receipt of a child protection plan.

20. Training

All members of our workforce have been provided with, and have signed to say that they have read, understood and will act upon, Part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually and governors have been provided with and signed to say they have read, understood and will act upon Part 2 of KCSIE (September 2025)

All staff members will receive appropriate safeguarding and child protection training / briefings which will be regularly updated annually. In addition, all staff members will receive safeguarding and child protection updates. These will be undertaken as part of staff meetings when they arise and safeguarding will be a standing item on the agenda of every full governors' meetings.

All staff will reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

All staff will also, as part of our induction, be issued with information in relation to our Child Protection and Safeguarding Policy, Staff Code of Conduct, Part 1 of KCSIE (September 2025) Key contacts, and What to do if a Child discloses Abuse.

Our DSL and DDSL(s) will undertake further multi-agency safeguarding training in addition to the whole school training. This will be undertaken at least every two years and will update their awareness and

understanding of the impact of the wider agenda of safeguarding issues. It will support both the DSL and DDSL to be able to better undertake their role and support the school in ensuring our safeguarding arrangements are robust and achieving better outcomes for the pupils in our school.

Our School Local Governing Body will have access to safeguarding training within the school. We will recommend and encourage them to undertake training specifically on the safeguarding responsibilities of the governing body in line with Part 2 of KCSIE, in particular the role of the Safeguarding Governor. In addition to this training the safeguarding trustee may wish to access multi-agency safeguarding training at least every two years.

At least one member of a recruitment panel will have undertaken safer recruitment training. This is updated every 2 years to ensure that the school are keeping up with changes made to recruitment processes and changes in safeguarding requirements when recruiting staff. Every member of our Senior Leadership team is trained in Safer Recruitment.

Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment too. Where extended school activities are provided by and managed by the school, our own safeguarding/ child protection policy and procedures apply to all students involved. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits, we will check that effective safeguarding/ child protection arrangements are in place. Risk Assessments are reviewed by the Headteacher and Associate Assistant Headteacher responsible for Trips and Visits.

21. Photography and images

A separate policy is held but our staff are aware at no times should their own personal cameras/smart phones be used in recording or taking pictures of children or young people in this school. At admission, parents are requested to give or relieve consent on the usage of images of their children. This information is collated and shared with relevant parties in school and student 'planners' have an indicative marker that staff can check to inform their actions of photographing or recording children for school-based events or activities.

22. Associate Staff

Our school recognise that some staff may find dealing with safeguarding and child protection concerns very difficult and upsetting. It may trigger memories of their own difficult childhood, or be an experience they have had as an adult, or a member of their family, or close friendship group has experienced.

The school hopes in such situations that the individual staff member would be able to talk to a member of the senior leadership team. The school's Human Resources Team is also able to guide access to appropriate support services.

There are many organisations within Bexley who offer support services to individuals on a range of very sensitive issues e.g. Domestic Abuse, Sexual Abuse (current and historic) drug and alcohol misuse, mental health. More information can be accessed via MASH or the Early Intervention Team. We commit to having updated and relevant signposting to these services to all stakeholders on the safeguarding area of our website.

In addition, the member of staff should be able to access support through:

- Their own GP.
- The Samaritans Telephone: 116 123
- NSPCC HELPLINE Telephone: 0800 800 5000 (not just there for children)
- Employee assistance programme assistance@workplaceoptions.com 0800 243 458

23. Appendix A: Signs and Indicators of Abuse

A more comprehensive list will be considered within staff training however this will give staff some indication of what to look out for.

Although these signs do not necessarily indicate that a child has been abused, they may help staff recognise that something is wrong.

If you have any concerns, you must pass these to your Safeguarding Team immediately.

Physical Abuse

Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical / social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. Occasionally a 'pattern' may be seen e.g. fingertip or hand mark. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks or welts
- Broken bones
- Burns- shape of burn, uncommon sites, friction burn

- Changes in behaviour that can also indicate physical abuse:
- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home
- Fearful watchfulness
- Self-harm

Neglect

It can be difficult to recognise neglect, however its effects can be long term and damaging for children.

It is also impossible to recognize that aspects of neglect can be very subjective. We may need to challenge ourselves and others and remember that people can have different values and that there will be differences in how children are cared for which may be based on faith or cultural issues that are different to ours.

In respecting these differences, we must not be afraid to raise our concerns if we believe the care being given to the child may be impacting on its safety and welfare.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'
- Constant hunger, sometimes stealing food from other children
- Losing weight, or being constantly underweight (obesity may be a neglect issue as well)
- Inappropriate or dirty clothing
- Untreated illnesses
- Persistent tiredness
- Exposed to danger-lack of supervision at home

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised
- Not having many friends
- Complaining of being tired all the time
- Low self esteem
- Compulsive stealing
- Compulsive begging
- Not requesting medical assistance and/or failing to attend appointments

Emotional Abuse

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive (also known as faltering growth) and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled.

They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic/anxious behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Development delay in terms of emotional progress
- Overreaction to mistakes
- Frequent vomiting

Sexual Abuse

It is recognised that there is underreporting of sexual abuse within the family. All Staff and Trustees should play a crucial role in identifying / reporting any concerns that they may have through, for example, the observation and play of younger children and understanding the indicators of behaviour in older children which may be underlining of such abuse.

All Staff and Trustees should be aware that adults, who may be men, women or other children, who use children to meet their own sexual needs abuse both girls and boys of all ages.

Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Stomach pains
- Pain on urination
- Bruising on inner thighs/buttocks
- Anorexic /bulimic
- Stained or bloody underwear
- Discomfort when walking or sitting down

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Acting in a sexually explicit way towards adults
- Chronic depression
- Low self esteem
- Afraid of the dark
- Evidence of substance abuse
- Association with older people especially men
- Phone calls or messages from adults

Note: A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone.

Child Sexual Exploitation (CSE)

Many aspects of CSE take place on line so it may be difficult to identify this within school. However, abuse indicators may include:

- Children talking about having lots of 'friends' online whom when asked they do not know personally
- Disengagement from education
- Using drugs or alcohol
- Unexplained gifts/money
- Repeat concerns about sexual health
- Decline in emotional wellbeing
- Talking about physically meeting up with someone they met online
- Posting lots of images of themselves online
- Going missing
- Talking about friendships with older young people/adults
- Engagement with offending
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late

- Children who regularly miss school or education or do not take part in education

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

24. What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003¹⁰⁹ as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or 109 Legislation.gov.uk 88 anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

25. Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
 - online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;

As set out in UKCIS sharing nudes and semi- nudes: advice for education settings working with children and young people taking and sharing nude photographs of Under 18's is a criminal offence:

- Sharing of unwanted explicit content
- Up skirting is a criminal offence
- Sexualised online bullying
- Unwanted sexual comments and messages, including, on social media, sexual exploitation, coercion and treats

26. What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. The Sex and Relationships Policy at Schools within the Trust should detail how and when the issue of consent is taught.

27. Female Genital Mutilation (FGM)

Although situations of FGM may be unusual it is important that you do not assume it could not happen here.

Indicators may include:

Days absent from school

Not participating in physical education

In pain/has restricted movement/frequent and long visits to the toilet/broken limbs

Confides that she is having a special procedure, cut or celebration

Unauthorised and or extended leave, vague explanations or plans for removal of a female in a high risk category especially over the summer period

Plans to take a holiday which may be unauthorised, unexplained or extended in a country known to practice FGM

Parents from a country who are known to practice FGM

28. Appendix B: Dealing with a Disclosure of Abuse

It is extremely important that if a child discloses that you know what to do. This will be explained by the DSL/DDSL during induction and will form a key part of any safeguarding training undertaken within school. These are the key principles:

If:

- A child or young person discloses abuse, or
- You suspect a child may have been abused, or
- You witness an abusive situation involving another professional You

RECORD AND REPORT:

- Respond without showing any signs of disquiet, anxiety or shock
- Enquire casually about how an injury was sustained or why a child appears upset, e.g. How did you?
- Confidentiality must never be promised to children, young people, or adults in this situation
- Observe carefully the demeanour or behaviour of the child
- Record in detail what has been seen and heard in the child's own words (after you have spoken to them, not during a disclosure)
- Do not interrogate or enter into detailed investigations: rather, encourage the child to say what she/he wants until enough information is gained to decide whether or not a referral is appropriate
- Ensure if the child is complaining of being hurt/unwell this is reported immediately

Asking questions is fine to help understand what the issue is **BUT** you must ensure the questions are open and give the child the ability to clarify

- It is important NOT to ask leading questions e.g. Did ----- Was it?
- It is important to know when to stop asking questions and listen
- It is important not to interrogate

Types of Questions you can ask:

- Tell me? (tell me what happened)
- Explain? (explain what you meant by)
- Where did this happen/where were you?
- When did this happen?

Remember you are only clarifying with the child if something concerning did happen or could have happened from the information they give you.

Then report to your DSL or DDSL immediately. **If they are not available, contact MASH.**

Staff MUST NOT

- Investigate suspected/alleged abuse themselves
- Evaluate the grounds for concern
- Seek or wait for proof
- Discuss the matter with anyone other than the designated staff or MASH
- Speak to the parents until you have had a conversation with your DSL/MASH
- Promise to keep it a secret

29. Appendix C: Procedures if an allegation is made against a school's staff member (including volunteers and Trustees)

Never let allegations by a child or young person go unrecorded or unreported, including any made against you. There are very clear procedures that are there to protect children but also to ensure as much protection as possible against a potential false allegation involving a member of staff.

Any allegations should be reported to the headteacher regardless as to whether they are the designated safeguarding lead as they are ultimately responsible for all staff within the school.

If the allegation concerns the headteacher, then the Chair of Trustees or the Chair of the Trust should be informed immediately.

In all situations there should be a discussion with the Local Authority Designated Officer (LADO) or if they are not available then MASH can be contacted for advice and guidance. If they feel a referral should be made, then they will advise you to complete the appropriate referral form which should then be sent in via MASH

If you receive a disclosure, about an adult colleague, it is important to reassure the child that what she/he says will be taken very seriously and everything possible done to help.

Any member of staff while subject to an open and ongoing investigation will be placed on leave.

30. Appendix D: Key Roles and Responsibilities Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the Deputy Designated Safeguarding Lead (DDSL) team will act as cover. In extenuating circumstances where the DSL and DDSL are not available, DSO team will act as cover.

The Trust follows the guidance within Annex B: KCSIE which includes:

- Being a central point of contact for all staff
- Confident in knowing what to do and where to go if you have concerns
- Ensure records are kept up to date, safely and securely
- That all staff are aware of their safeguarding responsibilities
- Be the initial point of contact for external agencies in relation to safeguarding issues
- Promote awareness of safeguarding in relation to the children, all staff, the governing body and parents

31. Deputy Designated Safeguarding Lead (DDSL)

As above. They will be trained to the same level of the DSL.

We have a number of our SLT team who are DDSL as listed at the start of the policy. All records are kept centrally and available to be accessed by the designated safeguarding staff.

32. Governing Body

- Members of the governing body should adapt to meet the requirements of Townley Grammar School
- trust governance alongside Part 2 of KCSIE 2025 but ensure they are still meeting the requirements
- from Part 2 of KCSIE (September 2019) this includes:
- Taking leadership responsibility for the school's Safeguarding and Child Protection arrangements; this includes assisting the DSL with the S175/157 safeguarding self- assessment on an annual basis.
- That they are up to date with emerging issues in Safeguarding and recognise the strategies by the Local Authority in trying to keep children safe in Bexley.
- Ensuring that we have a nominated link trustee for Child Protection and Safeguarding and this person has received appropriate training for their role.
- The designated safeguarding trustee visits the school regularly to review safeguarding within the school and includes within visits regular discussions with children and to verify that the Single Central Record is up to date.
- Ensuring that we have a DSL for Child Protection, appointed from the Senior Leadership Team and one who oversees and line manages the activities and the activities of all other leads in the school. The number of DDSLs needs to be sufficient in number depending upon the size and demands of the school.
- That the DSL/DDSL are fully equipped to undertake the Safeguarding role and that they have access to the appropriate training and that this is updated with certified training every two years.
- That a DSL is on the premises and available during school hours, where this is not available there is cover in place. Therefore, ensuring there is cover at all times.
- That we have a nominated link trustee for LAC (children in Local Authority Care) and SEND alongside other nominated leads in the School on these issues.
- We have an appointed teacher who is responsible for Looked after Children (LAC) who understands his/her Safeguarding responsibilities and is fully aware of the Local Safeguarding procedures and attends regular training and briefings in relation to children in care.
- Safeguarding is an agenda item at every full governing body meeting and the governing body have access to trends and changes in training, reporting and referrals within the school setting and referrals to relevant agencies.
- That there are procedures in place in handling allegations against Staff, Volunteers and Trustees and any concerns staff and volunteers have (including concerns about the school) are brought to the attention of the Local Authority Designated Lead (LADO) in every case.
- That all Staff, (including volunteers and frequent visitors) who will be working in the school are given a mandatory induction which includes knowledge regarding abuse, neglect, staff code of conduct specific safeguarding issues and familiarisation with Child Protection responsibilities. The induction will also include procedures to be followed if anyone has any concerns about a Child's Safety or welfare, and knowledge about the School's policies and procedures.
- That all Staff have regular reviews of their own practice to ensure ongoing personal/professional development.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners. Safeguarding briefings and updates are given to all staff including Trustees a minimum of yearly.
- To ensure that children are taught about Safeguarding, including on line, through teaching and learning opportunities, as part of providing a broad and balanced curriculum including PSHE.
- We have in place an e-safety Policy equipped to deal with a widening range of issues associated with technology.
- That we understand the need to identify trends and patterns regarding children who are absent from education and to respond to / refer where required.
- That we notify Children's Social Care if there is an unexplained absence of a pupil who is the subject of a Child Protection Plan.
- That we notify Children's Social Care if it is thought or known that a child or young person may be Privately Fostered.
- Making sure that the Child Protection/Safeguarding Policy is available to parents and carers as appropriate including displaying on the school's website.
- That all relevant safeguarding policies are reviewed on a regular basis (safeguarding policy should be annually) and that all legislative changes as well as changes to mandatory national guidance and local

processes are reflected within the relevant policies and procedures within school.

- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

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

The Headteacher

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

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

33. Appendix E: Key Messages from Local Child Safeguarding Practice Reviews

(previously known as Serious Case Reviews)

As described in Working Together 2023, Serious Case Reviews (SCR) were replaced by Local Child Safeguarding Practice Reviews (LCSPRs).

When children die or are seriously injured consideration is given as to whether there needs to be a Local Child Safeguarding Practice Reviews. The purpose is to identify what information we had, what actions were taken, and what if anything we can learn from this that may improve practice in the future.

Messages from Local Child Safeguarding Practice Reviews (along with national reviews) are published on a regular basis the following are some of the key messages which from a school perspective we need to be aware of, they include:

- You can never age bruising
- Ensure you observe children as much as you can in natural light if you are concerned about bruising or marks
- If you see an injury to one child always consider the siblings
- Cases where Interpreters/culture/communication/travellers/language/religion were involved
- Parents with a mental health problem/ learning disability/ stress/postnatal depression
- Where Domestic Abuse is present
- Disguised compliance/resistant families/hard to reach families/professional challenge
- Children with chronic illness/serious health conditions
- Unsupported and socially isolated parents
- Poor information gathering, sharing and recording within schools as well as with other agencies
- Assessing the complete circumstances of the child and family, including their history
- Critically analysing all information
- Ensuring the needs of the child are paramount above those of the parents
- Appropriate representation is needed at key meetings- Child Protection Case Conferences
- Effective multi-agency working
- Staff to be curious, inquisitive and ask more questions
- Reflection and constructive challenge for staff when working with vulnerable children and young people
- Staff to observe safer working practices

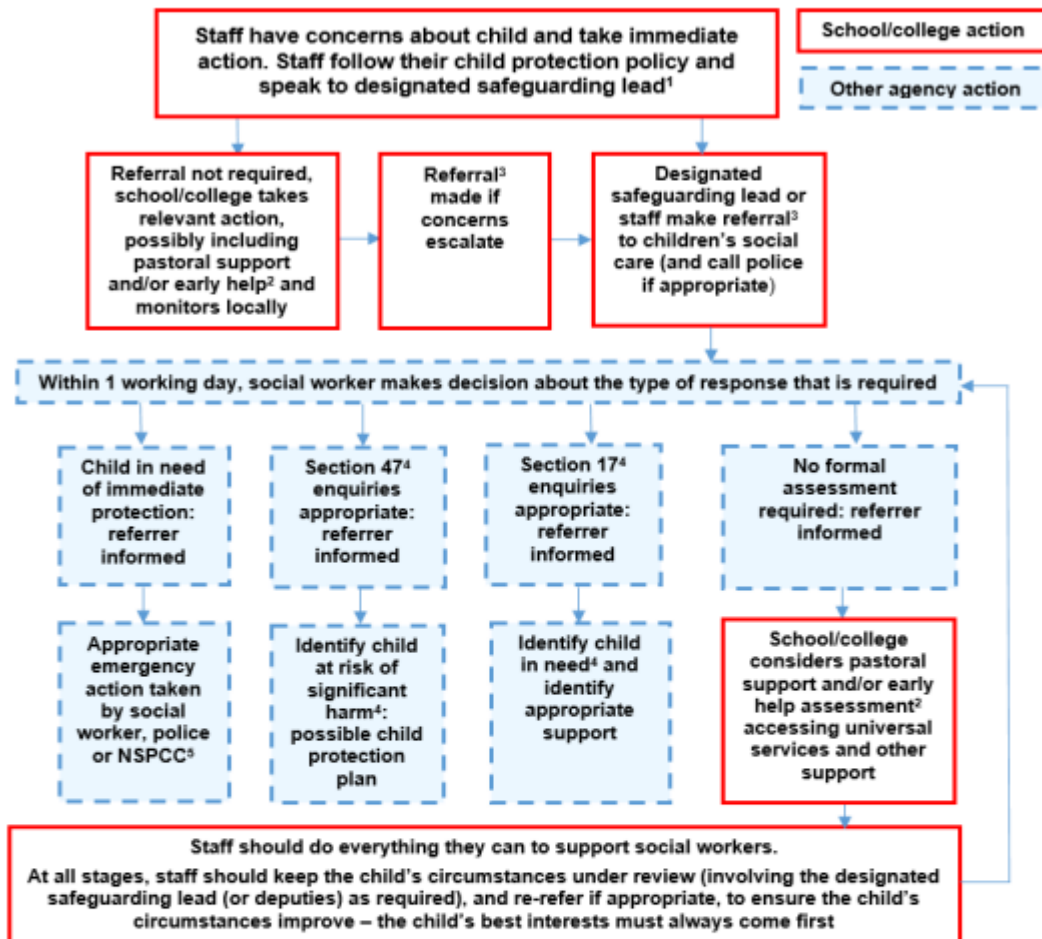
Appendix F:

[Full text of Keeping Children Safe in Education 2025](#)

34. Appendix G: Page 24 Keeping Children Safe in Education 2025

A flowchart setting out the actions taken where there are concerns about a child

Figure 1



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Early 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 early help, an early help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the early 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).