Hollymount School

Child Protection and Safeguarding Policy

(including safer recruitment, allegations against staff and low-level concerns)

Issue Date	Autumn Term 2025	Review Date:	Autumn Term 2026

Hollymount's Safeguarding & Child Protection Policy is in line with Keeping Children Safe in Education 2025 and the quality and standards expected from Merton Local Authority. This policy will also be reviewed annually or when new legislation requires changes, whichever is the soonest. This policy is approved by the *The Governing Body.*

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1. Safeguarding Policy Statement

At Hollymount we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is

fundamental to create and maintain a child-centred approach to safeguarding. A whole-school, child-centred approach is fundamental to all aspects of everyday life at our school.

In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.

In line with our duties set out in the Children Act (1989, 2004) and Working Together to Safeguard Children (2023) we are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families, with their parents playing a full part in their lives where possible. We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

We hope that parents and carers will support us to undertake our statutory duties to offer Early Help support and to liaise with agencies to protect children who have suffered or otherwise likely to suffer significant harm without doing so. The core objective of Early Help support is to support children and families to thrive and prevent children being placed at increased risk. This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads (DSLs) and Governance.

This policy sets out our values and processes to keep children safe from harm and should be read in conjunction with Keeping Children Safe in Education 2025; statutory guidance for schoolss and colleges. Alongside Keeping Children Safe in Education 2025 *school* adopts the fundamental principal of *working in a child-centred approach within a whole family focus* as promoted in Working Together to Safeguard Children 2023.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication Stable Homes, Built on Love in response to the recommendations of the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through early help and family networks.

At *Hollymount* our principles align to the above. We endeavour to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

2. Important Safeguarding Contacts

Hollymount's In-House Contacts:

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Joe Croft	Headteacher@Hollymount.merton.sch.uk
Deputy DSL	All of SLT	https://www.Hollymount.org/get-in- contact/
Chair of governors	Rae Ann Faiz and Sam Ramen	chairofgovs@Hollymount.merton.sch.uk
Channel helpline		020 7340 7264
Designated Teacher for Children in Care (DT for Children in Care)	Faye Kimber	Fayekimber@Hollymount.merton.sch.uk
Special Educational Needs Coordinator (SENDCO)	Faye Kimber	Fayekimber@Hollymount.merton.sch.uk
Mental Health Lead	Joe Croft	Headteacher@Hollymount.merton.sch.uk
DSL Prevent Lead	Joe Croft	Headteacher@Hollymount.merton.sch.uk
Link Safeguarding Governor	Heather Field and Jo Richardson	hfieldgovernor@Hollymount.merton.sch.uk and jrichardsgovernor@Hollymount.merton.sch.uk
Data Protection Officer	Derek Crabtree	Derek.Crabtree@merton.gov.uk

Non Hollymount Contacts:

Organisation / Role	Name	Contact details
Merton Safeguarding Children Partnership (MSCP)		Email: Home - Merton Safeguarding Children Partnership
Merton Local Authority Designated Officer (LADO) Merton Part-time LADO	John Shelley Christine Dyson	Tel: 0208 545 3187 Email Lado Referral: lado@merton.gov.uk or securely: lado@merton.gov.uk.cjsm.net.
Merton Local Authority Children and Families Hub (previously MASH)	Children and Families Hub	Tel: Monday to Friday 9am to 5pm 020 8545 4226 / 4227 Email:candfhub@merton.gov.uk **OUT OF HOURS**: Children's Emergency Duty Team 020 8770 5000

Organisation / Role	Name	Contact details
		Requests for a Service
Merton Local Authority Early Years, Family Wellbeing and Early Help Service		Tel: 020 8274 5300 Email: FSD@merton.gov.uk
Merton Education Welfare Service		Tel 020 8545 4021 Email: education.welfare@merton.gov.uk
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
The Lucy Faithful Foundation: Shore Space:		Stop It Now helpline: Tel: 0808 1000 900 Email: contactus.stopitnow.org.uk
Police	N/A	Emergency 999. Non-emergency 101

3. Legislation and Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance.
Keeping children safe in education 2025 which sets out the legal duties that all school's and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.
Section 175 of the Education Act 2002,places a duty on school's and Local Authorities to safeguard and promote the welfare of pupils.

The schools Staffing (England) Regulations 2009[1], which sets 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.

Maintained schools governance guide - 7. Compliance - Guidance - GOV.UK (www.gov.uk) (2024) provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance.
This guidance is a reference document for those involved in local-authority-maintained schools governance. It brings together essential information from a range of sources on the governing body's roles and legal responsibilities.

Early Years providers add:

- This policy also meets requirements relating to safeguarding and welfare in the Statutory framework for the early years foundation stage for group and schools providers (publishing.service.gov.uk)
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

All education settings add:

- Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Working Together to Safeguard Children statutory guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England
- The Lead Safeguarding Partners for the Merton Safeguarding Children Partnership are Merton Safeguarding Adults Board, South West London Integrated Care Board and the Metropolitan Police. They have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and organisations and agencies are clear about how they will work together to safeguard children and promote the welfare of children.
- Serious Crime Act 2015, Female Genital Mutilation Act 2003 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

[1] KCSIE para 266: Schools and colleges can use the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the DfE's web page. Users will require a DfE Sign-in account to log onto the service.

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism"
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils regarding these characteristics.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. Working collaboratively as professionals is a key part of providing services to children and families. When professional disputes happen that cannot be resolved in a timely manner the MSCP's Multi-Agency Escalation Policy should be followed.

- DfE Information Sharing Advice For Practitioners 2024 produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the "Seven Golden Rules for Sharing Information,"

4. Definitions: Safeguarding and Child Protection

Making a referral to Children's Services and/or requesting support

What children and young people need to know and do to report safeguarding concerns (abuse neglect and exploitation)

What you can do to report concerns:

- you can speak to any member of staff of your choice. Those staff will listen and support you, and we have a team of DSL / DDSL in our school who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.

The DSL may seek advice, and / or refer to
Children and Families Hub for consultation and /or request for service: candfhub@merton.gov.uk

Where a referral is urgent,
please call on 020 8545 4226 / 4227 and
ask to speak to a duty social worker.
Requests for a Service

The Children and Families Hub is open between 9am and 5pm Monday to Friday (working days only). Referrals received outside of those hours will not be considered until the next working day.
The out of hours Children's Emergency Duty Team should be contacted on 020 8770 5000, outside of core working hours.

If you are being abused, neglected or exploited you can call Children and Families Hub:
020 8545 4226 / 4227.
If you are in immediate danger and/or think a crime has/is being committed, you can call the Police on **999.**
You can contact the NSPCC Helpline by calling 0808 800 5000 or email: help@nspcc.org.uk

All our staff at Hollymount we are expected to be familiar with the wide range of policies and procedures we have to keep our children safe and promote their wellbeing at all times.

Safeguarding as defined in Keeping Children Safe in Education (2025), means:

- *providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing impairment of children's mental and physical health or development ensuring that children grow up in circumstances consistent with the provision of safe and effective care*
- *taking action to enable all children to have the best outcomes.*

Working Together to Safeguard Children (2023) further extends this definition to include:

- *promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children*
- *taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.*

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

'Early Help' means taking action to support a child, young person or their family early in the life of a problem, as soon as it emerges. It can be required at any stage in a child's life and applies to any problem or need that the family cannot deal with or meet on their own.
Merton Local Authority have produced guidance and information for practitioners working with children and families that can be found via the Effective Support for Families Model. The document provides detailed information on levels of need and the range of services available to families. This includes guidance on the MSCP Indicators of Possible Need. advises what support is available whatever the needs are of children young people and their families.
Merton Local Authority offer a service of Early Help Co-Ordinators who are able to support education services in safely and effectively assessing family's needs and ensuring families are able to access the right

support at the right time. With an array of knowledge of services and support across Merton. They are on hand to offer advice and guidance around:

- Assessing child and family needs utilising the Effective Support Model
- Undertaking an Early Help Assessment
- Convening a Team Around the Family meeting
- Developing whole family plans/identifying appropriate interventions

Merton Local Authority offer a range of support and services via Family Hubs : Find your nearest Family Hub Getting support | Family Hubs | Merton Council

Child in Need: A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled.

Child Protection: Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside or outside of the child's home. School's are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

Significant Harm is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse.

Children and Families Hub (formerly known as MASH) provides a single point of contact for professionals and members of the public who want to seek support or raise concerns about a child. The Children and Families Hub is a fully integrated multi-agency team which involves key safeguarding agencies including professionals from social care, police, health and education. These agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

Children in Care: A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a Kinship Care Strategy to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies.

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. School's are also aware and will

consider a reported child may have also experienced abuse. We will decide what is appropriate and which terms to use on a case-by-case basis. School's will work to the recommendations of Merton Local Authority and specialist services for appropriate terminology and may use terms such as '*the reporting and reported child / persons'*.

5. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At Hollymount we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

All staff and volunteers understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole School approach to look and listen out particularly for children:

- who have a special educational need and/or disabilities (SEND) or health conditions
- who are a young carer
- who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are in care or were previously in care (see Section 11)
- who have ongoing unexplainable and/or persistent absences from education
- whose parent/carer has expressed an intention to remove them from Hollymount to be provided with elective home education (EHE).

Adultification: Adultification is a concept describing when children are not afforded notions of innocence and vulnerability and are put at risk by those who do so. Adultification is always founded within discrimination and bias. Merton Safeguarding Children Partnership, commissioned an independent scrutiny in relation to adultification. Hollymount will embed any findings of the scrutiny to prevent the adultification of black children in Merton.

Children with Special Educational Needs and Disabilities (SEND)

Merton Local Authority SEND SUPPORT AND SERVICES

We know who our pupils are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers., which can include:

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

- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation
- We will use language that aligns with the SEND Code of Practice (KCSIE 2025 update - removing terms like "spectrum" and "disorder

Children in Care (CiC)
Support and information for looked-after children and young people
Children in Care Council

The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for Children in Care
- appropriate staff made aware of a child's looked after status
- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual School head for DT to liaise with.

Children with a Social Worker
Virtual School for Looked-After Children Virtual Schools Heads have a responsibility for the strategic oversight of the educational attendance, attainment, and progress of:

- **children in care**,
- **children previously in care**; and
- **children with a social worker** – defined as any child who has been assessed as being in need under section 17 of the Children Act 1989 and currently has a social worker; it also includes those who have been assessed as needing, or previously needing, a social worker within the past 6 years due to safeguarding or welfare reasons.

In line with Promoting the education of children with a social worker and children in kinship care arrangements: virtual School head role extension - GOV.UK (www.gov.uk) this has been extended to include:

- **children who have previously had a social worker** – the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 to 18; and
- **children in kinship care arrangements** - this means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement.

Hollymount ensures that our Designated Teacher has the appropriate training, so they are able to take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead which includes:

- working closely with virtual School's heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- collaborating with the virtual Schools heads to also promote the educational achievement of children previously in care.

Pupils who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2025 on gender questioning children remains under review, pending the publication of revised guidance. (KCSIE 2025 para 204)

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 policy for more detail on how we prevent bullying based on gender or sexuality.

6. Roles and Responsibilities of Staff including Leadership and Management

Role and Responsibilities of the Whole School

Safeguarding is **everyone's** responsibility at Hollymount. This policy applies to all of our staff including permanent, temporary and supply, volunteers, governors and contractors. It also applies to our safeguarding arrangements for extended Schools and off-site activities.

Hollymount 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. This will be underpinned by our:

- Hollymount's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training. As part of staff induction new staff/ volunteers are provided with the following key guidance and information provided by our School's senior leadership team:
  - Safeguarding & Child Protection Policy
  - Staff Behaviour Policy/Code of Conduct
  - the role and identity of the Designated Safeguarding Lead (DSL) and deputies
  - Online Safety policy
- our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
  - Behaviour Policy
  - Pastoral support system
  - Planned programme of relationships, sex and health education (RSHE) in an age appropriate way, which is inclusive and delivered regularly, tackling issues such as:
  - healthy and respectful relationships
  - boundaries and consent
  - stereotyping, prejudice, and equality
  - body confidence and self-esteem
  - how to recognise an abusive relationship (including coercive and controlling behaviour)
  - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - what constitutes sexual harassment and sexual violence and why they are always unacceptable.
  - Help our learners to develop healthy relationships and access resources from the Lucy Faithful Foundation to develop staff learning

Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors

All staff will be required to:

read the appropriate sections of Keeping Children Safe in Education, according to their level of responsibility as outlined in the document, and the reviewed version of this guidance at least annually.

Suspensions, permanent exclusions, and commissioning of Alternative Provisions.

(To be read in conjunction with the Behaviour Policy and exclusion policy)

When the setting is considering suspending or permanently excluding a child where an additional vulnerability is identified it is important that the child's welfare is a paramount consideration. The Head Teacher will consider their legal duty of care when sending a learner home. Hollymount will exercise their legal duties in relation to their interventions. This includes:

- Interventions will be consistent with statutory guidance suspensions and permanent exclusions - GOV.UK (www.gov.uk)
- whether a statutory assessment should be considered in line with the principles of Children Act 1989,

- that decisions are made in an anti-discriminatory manner in line with the Equality Act 2010 (including having regard to the SEND Code of Practice)
- and takes into consideration the learner's rights under the Human Rights Act 1998.

- **Hollymount will consider :**An assessment of need should be undertaken with multi-agency partners with a view to mitigate any identified risk of harm this is in line with Merton's Practice Framework :The Right Help – at the right time – in the right place
- If the child is subject to a child protection plan or where there is an existing child protection file, we will call a multiagency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, we must complete a risk assessment prior to convening a meeting of the governing body.

Commissioning Alternative Provisions

When commissioning Alternative Provision Hollymount will have regard to statutory guidance: Alternative provision - GOV.UK Education for children with health needs who cannot attend Schools - GOV.UK (www.gov.uk)

We will ensure there is a clear agreement of roles and responsibilities to maintain safeguarding and daily monitoring of attendance arrangements for learners who are not taught on site.

Where we place a learner with an alternative provision provider Hollymount continues to be responsible for the safeguarding of the learner and should be satisfied that the placement meets the pupil's needs.(KCSIE 2025 para 168)

The cohort of learners in Alternative Provision often have complex needs, Hollymount's governing board and proprietors of Hollymount will be made aware of the additional risk of harm that learners may be vulnerable to.

We will always obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that Hollymount would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning Hollymount can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Children Missing or Absent from Education

Merton's Good Practice Guidance for Identifying and Safeguarding Children Missing from Education (CME)

(To be read in conjunction with the Attendance Policy.)

A learner missing or absent from education is a potential indicator of abuse or neglect, or maybe an indicator of need for early help support. Staff should follow procedures for unauthorised absence and for dealing with children that go missing or are absent from education, particularly on repeat occasions. These should be reported to the DSL and reviewed in line with identifying and monitoring the needs of vulnerable learners.

Hollymount will follow the guidance detailed in Children Missing Education (2016), Working together to improve school attendance 2024 which states; how Hollymount must work with local authority children's services where school absence indicates safeguarding concerns and Merton's Good Practice Guidance for Identifying and Safeguarding Children Missing from Education (CME) Hollymount will comply with submitting attendance returns to the Local Authority within the agreed timescales.

This will include notifying the local authority in which the child lives:

- of any pupil who fails to attend Hollymount regularly,
- or has been absent without the school's permission for a continuous period of 10 school days or more

Link: Attendance Notification Form

Elective Home Education: Children educated at home

Hollymount will notify the Merton Local Authority of every learner where a parent has exercised their right to educate their child at home.

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

Our DSL team includes a member/s of our senior leadership team. We also have Deputy DSLs (DDSL) within our staffing group.

- The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on Hollymount devices and Hollymount networks to keep pupils safe online.
- Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.
- The DSL will act as the main contact in our school when a child and their family are receiving support from the school, external agencies and statutory services.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The SLT team ensure they work with our extended schools lead (who is also a DSL) to ensure safeguarding is maintained at all time.
- In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary by email. A member of SLT will always be on a rota and contactable in holidays.
- When the DSL is absent, please contact Hollymount's Deputy DSL(s) whose details are all on our website contact page.
- If the Hollymount's DSL and deputies are not available or cannot be reached then our extended schools lead or any member of staff can be spoken to and a DSL will be found.
- *The full role of the DSL can be found in Annex C, page 171 of KCSIE 2025*

The DSL will be given the time, funding, training, resources and support to enable them to fulfil the functions outlined in KCSIE 2025.

The DSL will also:

- keep the Headteacher informed of any issues, the conversations with children and their families, universal services and referrals to external agencies and statutory services
- liaise with universal, targeted and statutory agencies, Local Authority workers (Children's Services and other key practitioners) when there are safeguarding concerns as appropriate (includes early help and child protection)
- share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Merton Children and Families Hub in order to prepare and implement the Hollymount's policies
- be confident about what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment.

Role and Responsibilities of the Governance

Our Governing Body have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

The Governing Body will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the setting

- evaluate and approve this safeguarding and child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Headteacher to account for their implementation
- evaluate and approve recommendations/action plans identified through quality assurance activity that the Headteacher/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher/Principal accountable for the practice improvement
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- appoint a senior body level (or equivalent) link governor to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full governing body. This is always a different person from the DSL
- ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and in line with statutory guidance.
- ensure that all governors/trustees:
    - read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually
    - sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance.
- 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. **Meeting digital and technology standards in schools and colleges**

The Governing Body will 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 effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff
- that this policy reflects those 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 on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
    - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

- the Chair of Governors will act as the 'case manager' in the event that an allegation is made against the Headteacher. where appropriate (see Section 11 Managing Concerns and Allegations)
- all governors receive appropriate safeguarding training, including at induction. This training should equip governors with the knowledge and skills to understand their safeguarding responsibilities and contribute to a safe school environment as outlined in Keeping Children Safe in Education 2025. Organisations like the National Governance Association and LGfL offer resources and training to support governors in this area

Role and Responsibilities of the Headteacher/Principal

The Headteacher/Principal will:

- implement this policy and ensure that all staff:
- are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction
- follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect
- make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the school's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them. This can be found on our website and in the school
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- act as the 'case manager' representing the school in the event of an allegation of abuse made against another member of staff or volunteer
- managing cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL
- ensuring the relevant staffing ratios are met, where applicable
- making sure each child in the Early Years Foundation Stage is assigned a key person
- overseeing the safe use of technology, mobile phones and cameras in Early Years setting

Role and Responsibilities of the Designated Teacher

Our Designated Teacher takes leadership of promoting the educational attainment of Children With a Social Worker which includes:

- working closely with Virtual schools Heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- to carry out their duties in line with:
  - Designated teacher for looked-after and previously looked-after children - GOV.UK
  - and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwinned with safeguarding processes.

7. Working with Families

Our principles include, but are not limited to:

Promoting effective partnership working with parents and carers e.g. build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion
- ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support

Communicating effectively verbally and non-verbally by:

- communicating with respect, being clear, curious and inclusive; adapting to parent's and carer's needs
- providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood
- ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the children, parents and carers which must include their views and wishes
- supporting families to access support to translate information where English is not their first language.

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
- providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

8. Confidentiality and Sharing Information

We strive to uphold good practice and work in partnership with children and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs. Trusted relationships are at the heart of working with children and their families at Hollymount.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. Our school understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be **transparent, open and clear** when we need to discuss any information or concerns that worry us about a child's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a child's safety or welfare to provide the family with specific support, we will **be upfront, transparent and honest about our concerns and the ways in which such services could help the family.** We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will support children to have the confidence to speak up and share their views as well as encouraging parents and carers of children at our school to have a willingness to engage with services that provide support.

If we have a concern about a child's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. **We will strive where possible to always gain consent and where we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children and Families Hub**, we will have made efforts to discuss, explore and provide support to address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, **for a small number of children, seeking parental consent is not always possible and may place a child or others at risk of harm, for example**:

- **the child would be placed at increased risk of significant harm through the action of gaining this consent**
- **there would be an impact on a criminal investigation**
- **a delay in making the referral would impact on the immediate safety of the child.**

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so KCSIE 2025 para 394

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. Hollymount recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, 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 when required.

Hollymount will have regard for the Government's publication Information sharing advice for safeguarding practitioners - GOV.UK includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse, neglect and exploitation
All our staff are aware of what abuse, neglect and exploitation is and have an understanding of the different types of indicators as outlined in Appendix 3 which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we are able to identify children who may be in need of help or protection at the earliest opportunity.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. 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. 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.
Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse
Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness FII).

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
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction
- a child seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing a child to feel frightened or in danger
- 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. It can be difficult to recognise emotional abuse and children may not always realise

they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Neglect

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

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

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.
  It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Sexual Abuse

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

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

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.
- **Child Labour Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be

vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

To develop understanding, Hollymount will access resources from specialist services such as Centre of Expertise on Child Sexual Abuse as they have introduced resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours and The Children's Society and Home Office - Preventing Child Sexual Exploitation

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, Hollymount and any place/space that children occupy or access such as:

- Child Abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage.

Hollymount will use the guidance of the MSCP to help learners who may have been / are being exploited and are at risk of exploitation. We understand Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. Hollymount can access support and guidance from Merton Local Authority and work to Contextualised Safeguarding information which includes:

- Exploitation Language Guide
- Contextual Safeguarding Strategy
- Contextual Safeguarding Strategy Action Plan
- Visit the Contextual Safeguarding Network website
- Merton Strategy on Merton Joint Protocol for the Assessment of Housing and Support Needs of Homeless 16-17 Year Olds

Child-on-Child Abuse

At Hollymount, we know that children can cause harm to other children. As a school we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships. Hollymount work with statutory services that help to identify where domestic abuse may/has taken place. Hollymount will support learners where domestic abuse has had an effect.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass is a national operation where local police forces notify education settings when the police are called to an incident to domestic abuse. DSL will be notified when the police have responded to a domestic abuse incident. This will enable the education setting to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes.

When we at Hollymount are concerned about the amount of police notifications or disclosures of domestic abuse we will consider seeking further advice.

This may include contact with:

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

- Consultation and / or Referral to Adult Social Care

- Consultation and / or Referral to Children and Families Hub

- Completing an Early Help Assessment

- or DASH to support the family.

Further information can be found at: What is domestic abuse?

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

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

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

Female Genital Mutilation (FGM)

Keeping Children Safe in Education (2025) explains that FGM includes *'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'*
FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'

Our teachers are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are

- informed by a girl under 18 that an act of FGM has been carried out on her
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.
Further information:
Female genital mutilation
MSCP Female Genital Mutilation Multi-agency Strategy 2024

Prevent and concerns about extremism
Hollymount is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which 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 in (1) or (2)

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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 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.
Where there is a concern, the DSL will consider the level of risk and make a referral to Children's Services. The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.
National Prevent Referral Form
London Borough of Merton :Guidance for Working with Children and Young People who are vulnerable to the messages of Radicalisation and Extremism

Concerns about Mental Health

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the Hollymount lead for Mental Health.

What all staff need to do to respond if abuse, neglect and exploitation is suspected or been disclosed.
At *Hollymount* we adopt a whole school approach and safeguarding is everyone's responsibility. Staff and volunteers, and governors must comply with our safeguarding procedures as set out below:

Concerns about child-on-child abuse
In most circumstances, incidents of pupils hurting other pupils will be dealt with under our behaviour policy. Our safeguarding and child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

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

If a pupil makes an allegation of abuse against another pupil it should be reported to the DSL who will take lead on the situation as per their role and in line with KCSIE 2025 page 171:

- if the incident is a criminal offence Hollymount have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child
- our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

Creating a culture where children feel safe in school and minimising the risk of all forms of abuse.
We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture in Hollymount.
We expect all staff to:

- challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent

- ensure pupils are able to easily and confidently report abuse using our reporting systems
- reassure victims that they are being taken seriously
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners
- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed
- consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

If a child makes a disclosure to a member of staff or volunteer

All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

We listen to children by:

- showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- encouraging children to tell their story in their own words
- avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions / prompts.

We reassure children by:

- making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- we let a child know it is not their fault as children are often made to feel blame by those harming them
- never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

Recording concerns

Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:

- record all conversations relating to any level of concerns on our recording systems; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words
- inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.
- At Hollymount we use CPOMS to record safeguarding concerns and records.

What Schools and college staff should do if they have concerns about a child

What to do if you're worried a child is being abused Advice for practitioners

Hollymount is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Any member of staff, including supply teachers, contract workers, volunteers, governors/trustees and visitors at Hollymount who has any concerns about a child's welfare should:

- maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality
- reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rational for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*)
- consider if the child needs medical attention and if so, prioritise ensuring they receive this
- you must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the DSL/deputies
- record what the child or other has disclosed in their language or describe what you have seen or suspect and your rational for this (*if it is the latter two*)

What will the Merton Authority Children and Families Hub do?

Where Hollymount make a request for service; within one working day of a referral being made, a social worker should acknowledge its receipt to the DSL and make a decision about the next steps and the type of response that is required.

Risk management and safety planning

The DSL, with support from deputy DSL, will take the lead role in managing any proposed risk and will provide support at the same time, but it is everyone's responsibility to uphold the Behaviour Policy and standards within the school to maintain a safe environment. Risk management strategies can be put in place while other investigations are going on, e.g. by the Police. Although another agency such as the Police or Children and Families Hub maybe / are or have investigated an incident, it is our duty here at Hollymount - to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of our school and the children we care for and reflect the advice and outcomes of external agency's actions. This is to ensure that all children and staff are supported and always protected. We will consider these matters on a case-by-case basis.

10. 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.

To address this, our school aims to:

- have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- protect and educate the whole Hollymount community to be safe and responsibly use technology, including mobile and smart technology
- set clear guidelines for the use of mobile phones for the whole Hollymount community
- establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2025:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If we feel our learners or staff are at risk, we will report it to the Anti-Phishing Working Group
(https://apwg.org/)

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- the safe use of social media, the internet and technology
- UK Council for Internet Safety (UKCIS).guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- keeping personal information private
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support
- how to recognise unacceptable behaviour online
- ensuring children know not to meet up with a person they have met online without a safe adult
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Ensure that learners are taught about safeguarding on the curriculum including online safety in compliance with statutory guidance Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)
- Public Health England: Every Mind Matters

- Acknowledging that child on child abuse can happen via mobile and smart technology between individuals and groups. This should be approached in the same process outlined in section 2.7 Responding to incidents of child on child harm **and read in conjunction** with our policy on the use of mobile smart technology
- National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education
- Provision of education via remote learning will comply with governmental advice Safeguarding and remote education - GOV.UK (www.gov.uk)
- The effectiveness of the setting's ability to safeguarding learners in respect to filtering and monitoring, information security and access management alongside the above will be reviewed annually.
- Preparing children with information for any online challenges and hoaxes, sharing information with parents and where to get help.

review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly; this includes using a self-assessment tool 'plan technology for your school service' to self- assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

We will also:

- train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the online safety policy.

Artificial Intelligence (AI)

Generative AI: product safety expectations to support

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. Hollymount 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.

Hollymount will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour and also acceptable use and online safety policy

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Hollymount will be familiar with DFE guidance Generative AI: product safety expectations to support to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education. DSL will share information with Hollymount staff to raise awareness of Generative AI and how to help to keep learners safe online

Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education 2025. Hollymount will work to Meeting Digital and Technology Standards in schoolss and Colleges in and this includes guidance on e-security from the National Education Network and working to meet the Cyber security standards for schools and colleges which will help to improve Hollymount's resilience against cyber-attacks

11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors

Merton Local Authority : Allegations Against Staff or Volunteers

Section 11 of the 2004 Children's Act places an expectation on our school to have a clear policy in line with the BSCP Child Protection & Safeguarding procedures for dealing with allegations against staff who work with children. All staff based within our school will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. The Sexual Offences Act 2003 (ss.16-24) and/or Crown Prosecution Service Website sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to students

- look after children at the school. "Looking after" is defined as regularly involved in caring for, training, supervising or being in sole charge of such persons
- a professional who has power and authority in a child's life and may have a key influence on their future is regarded as being in a 'position of trust'
- such a person will have regular contact with the child and may be acting in loco parentis.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people.

On receipt of any information which raises a concern about any of our staff, the Headteacher, or Chair of Governor, will consider whether the information suggests it is the following:

Allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

Concern about the Quality of Care/Practice is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose. These types of concerns should be addressed internally using performance management processes.

Complaint is a statement that something is unsatisfactory or unacceptable. A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' A complaint therefore can be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'

These issues must be addressed through internal complaints policy and procedures.

When concerns/allegations meet the harm threshold, Hollymount are required to comply with both Part Four of KCSiE and also Merton Safeguarding Children Partnership procedures manual section Allegations Against Staff or Volunteers

All staff and volunteers at Hollymount are required to immediately report any level of concerns about behaviour and/or conduct of adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing school facilities.

What happens next
Headteacher/Chair of Governors may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does they will make a referral to LADO giving consideration to our staff code of conduct, managing allegations policy and MSCP Allegations Against Staff or Volunteers procedures. If necessary, they will compete a LADO referral within one working day.
If the allegation does not meet the harm threshold for LADO, our Headteacher/Chair of Governors will follow the schools's Low Level Concerns policy.

Role of LADO

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC*)

Hollymount must have a policy in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold, these concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

Hollymount's leadership manage LLC* using our school's internal due process, if we consider a member of staff has breached our school's code of conduct, depending on the seriousness and impact on a child, we will also liaise with our human resource service:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping identify any weakness in the safeguarding system.

Our low-level concerns policy is a reflection and extension of the wider relevant staff behaviour guidance and code of conduct.

If we are uncertain of threshold criteria for either LADO referral or LLC we consult with Hollymount's HR and the LADO. At *Hollymount* we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the Hollymount or pre-employment vetting checks.

Safer Recruitment

The school operates safer recruitment procedures that includes statutory checks on staff suitability to work with children[2]. Disqualification under the Childcare Act 2006 still applies to staff themselves. All staff have a responsibility to inform the school where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of children in the school.

An enhanced DBS check is carried out for all new employees, staff have a responsibility to inform the Headteacher if their circumstances change whilst employed at Hollymount. This statement is in the Staff Behaviour Policy, which all staff have signed and agreed to adhere to.

As part of our background checks we will conduct an online search for shortlisted candidates, and we will inform all shortlisted candidates about this.

All members of staff are trained in and receive regular updates in online safety.

All staff and governors have regular safeguarding awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The name of the Designated Safeguarding Lead and deputy(s) are clearly advertised in the school with a statement explaining the schools's role in referring and monitoring cases of suspected harm and abuse.

After-school clubs, community activities and tuition: safeguarding guidance for providers

Out-of-schools settings: safeguarding guidance for providers - GOV.UK

Hollymount has a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of *Hollymount's* governing body to ensure any organisation that hires the school premises is compliant with the guidance set out in Out-of-school settings: safeguarding guidance for providers - GOV.UK In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

[2] Para 319 KCSIE 2025: Schools should also carry out a section 128 check for school governors, because a person prevented from participating in the management of an independent school by a section 128 direction, is also disqualified from being a governor of a maintained school. Using GOV.UK schools can check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction. There is no requirement for schools to record this information on the single central record, but they can if they chose to.

Other complaints

If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our schools Complaints Procedures can be found on our website

Whistleblowing

At Hollymount we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.
All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding procedures and arrangements.

Examples where Whistleblowing may apply:

- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public interest
- do not delay. Your concerns should be taken seriously and investigated, and your confidentiality respected
- you should report your concern to the Headteacher/other member of staff on the SLT, and if concerns are about the Headteacher, report to the Chair of the Governing Board/Board of Trustees

If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Services and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

12. Record Keeping

Hollymount will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. 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 (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022).

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). The recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.

The school will follow the Recommendation 17.

Receiving in and transferring pupil records to other education provision
If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information 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 should be within:

- **5 days** for an in-year transfer, or
- **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 wellbeing and safety of the child.

Retention, archiving and destruction of records
For records that are not transferred to another school for example the child leaves the country or is going to be home educated, we have:

- a clear retention policy
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

A flowchart setting out the actions taken where there are concerns about a child
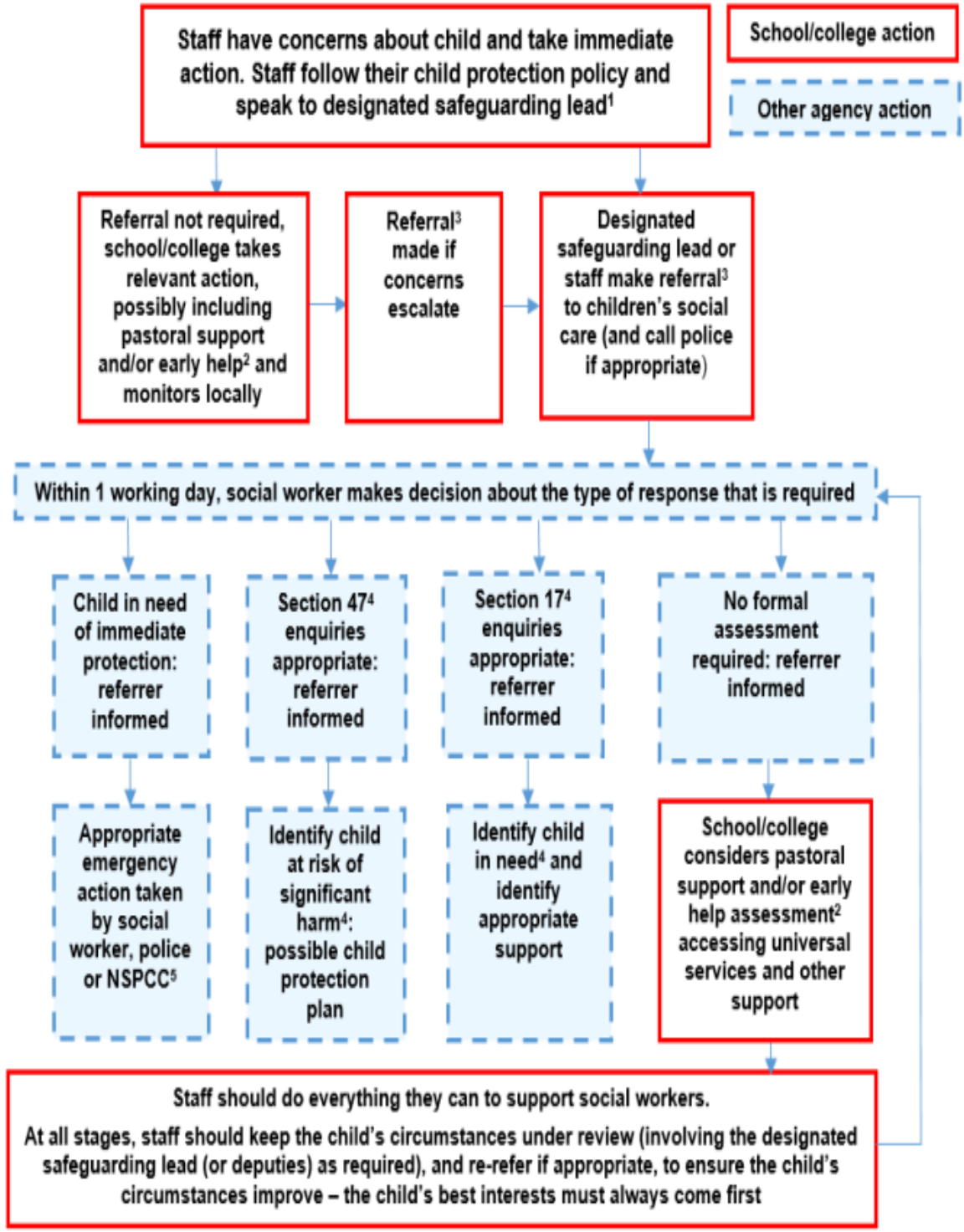
Figure 1