

Oak Farm Primary School

Safeguarding and Child Protection Policy



OAK FARM
PRIMARY SCHOOL

Approved by: Oak
Farm Governing
Body

Reviewed on:
October 2024

Last reviewed on:
September 2025

SAFEGUARDING POLICY CONTENTS

| No. | CONTENTS | PAGE |
|------|--|------|
| A | Responsible Persons | 3 |
| B | Applicability | 4 |
| C | Related Policies and Procedures | 4 |
| 1. | Introduction | 4 |
| 1.1 | Safe Practice | 5 |
| 1.2 | Partnerships with Parents | 6 |
| 1.3 | Partnerships with Others | 6 |
| 1.4 | Recruitment and Selection of Staff | 6 |
| 1.5 | School Training & Staff Induction | 6 |
| 1.6 | General Guidance | 7 |
| 1.7 | Related Policies | 7 |
| 2 | E safety | 8 |
| 2.1 | Internet use | 8 |
| 2.2 | Security of information systems | 8 |
| 2.3 | Filtering and monitoring systems | 8 |
| 2.4 | Email | 8 |
| 2.5 | Social networking, social media and personal publishing | 9 |
| 2.6 | Published content, online platform, photographs and videos | 9 |
| 2.7 | Cyber bullying | 10 |
| 2.8 | Introducing the policy to pupils, staff and parents | 10 |
| 3. | Safeguarding and Child Protection | 10 |
| 3.1 | What to do if you are worried a child is being abused | 11 |
| 3.2 | Emerging issues: FGM, Honour violence, peer abuse, CSE, sexting, Mental Health | 12 |
| 3.3 | Designated Staff responsible for Safeguarding | 16 |
| 3.4 | The role of the Governing body | 17 |
| 3.5 | Confidentiality of records | 17 |
| 3.6 | Working with Pupils or students | 18 |
| 3.7 | Designated Safeguarding Lead action | 18 |
| 3.8 | Concern about a staff member, carer or volunteer – low level concerns | 19 |
| 3.8a | Alternative Provision | 21 |
| 3.9 | Pupils or students staying with host families (Homestay) | 21 |
| 3.10 | Requests for assistance by other agencies | 21 |
| 3.11 | Pupils subject to a Child Protection Plan | 21 |
| 3.12 | Children who are Looked After | 22 |
| 3.13 | Private fostering | 22 |
| 3.14 | Attendance, admissions and Children missing education | 23 |
| 3.15 | Pupils or students with SEND and early help | 23 |
| 3.16 | Contact between staff and pupils and ‘reasonable use of force’ | 24 |
| 3.17 | Pupils or students who are LGBT | 24 |
| 4 | Anti-radicalisation | 24 |
| 4.1 | Context and principles | 24 |
| 4.2 | Links to other policies | 25 |
| 4.3 | Definitions | 25 |
| 4.4 | Aims and objectives | 25 |
| 4.5 | The role of the curriculum | 26 |
| 4.6 | Staff training | 26 |

| | | |
|------------|--|----|
| 4.7 | Indicators | 26 |
| 4.8 | Process | 26 |
| 4.9 | External speakers | 26 |
| 4.10 | Risk assessment | 26 |
| Appendix A | LOCAL AUTHORITY Contact details | 27 |
| Appendix B | Guidance for professionals – abuse and self-harm signs | 28 |
| Appendix C | Guidance for school staff in the event of a disclosure | 33 |
| Appendix D | Police definitions | 36 |
| Appendix E | Assessment framework | 38 |
| Appendix F | Whistleblowing Policy | 39 |

A. RESPONSIBLE PERSONS

The following are the responsible persons with regard to **Oak Farm Primary School** as referred to in this policy.

The school Designated Safeguarding Lead (DSL):

Ms Rosina Frempong – Deputy Headteacher

The members of staff listed above constitute the school’s Safeguarding Team.

Safeguarding & Child Protection lead governor:

Dr Charlotte Moore

Attendance Officer:

Ms Emma Fisk

Pastoral Manager:

Mrs Annie Gammell

Headteacher:

Mrs Jaspreet Cheema

Designated Teacher for Looked After Children:

Ms Rosina Frempong

B. APPLICABILITY

Anyone who has a safeguarding concern relating to a child on the school's roll, a member of staff, paid or unpaid of the school, a volunteer or contractor at the school, or anyone visiting or using school premises; or relating to an incident that took place at the school, should report the matter to the DSL and it will be dealt with in accordance with the School's Safeguarding Policy.

Where the subject of a safeguarding concern is a member of staff, the DSL must report the matter to the Headteacher, and it will be dealt with under the Staff Disciplinary Policy. The Headteacher must inform and take advice from the Local Authority Designated Officer.

Where the subject of a safeguarding concern is a member of a governing body, the DSL must report the matter to the Local Authority Designated Officer

Where the subject of a safeguarding concern is the Headteacher, the DSL must report the matter to the Chair of the Governors and the appropriate Local Authority Designated Officer.

C. RELATED POLICIES AND PROCEDURES

The following policies are directly related to and complement this Safeguarding Policy:

- Staff Code of Conduct
- Whistle-blowing Policy
- Recruitment and Selection policies and HR and Disciplinary policies
- Equality Policy

1. INTRODUCTION

"THE WELFARE OF THE CHILD IS PARAMOUNT"

At Oak Farm Primary School, the safety and welfare of our pupils is of the highest importance.

Because of the day-to-day contact with pupils, our staff are well placed to observe the outward signs of abuse. We have worked hard to ensure that there is a culture of vigilance within the school and that all adults working in the school know that they must protect pupils from harm and abuse and be aware that any pupil may be at risk of harm or abuse. Safeguarding is everyone's responsibility; we all have a duty to safeguard and promote the welfare of our pupils (*those under 18 years of age*) under the Education Act 2002, Children Act 1989 (updated 2004) and the Childcare Act (2006) (as amended 2019) through identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

In addition to our safeguarding policy, we are developing shared policies to cover the roles of staff, pupils and parents in respect of health and safety, anti-bullying, and equality. We also ensure that issues of child protection are raised with pupils through the Personal, Social and Health Education (PSHE) curriculum. Our policy applies to all staff, paid and unpaid, contractors, school governors and volunteers and others using or visiting the school premises, and references to 'staff' in this policy apply to all of these persons unless explicitly qualified.

There are a number of elements to our policy:

- Ensuring Safer Recruitment practice in checking the suitability of all our staff and volunteers to work with children;
- Raising awareness of safeguarding issues amongst all staff and volunteers and of what to do if they have concerns;
- Ensuring that a system is in place to protect our pupils from mistreatment;
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Developing effective links with relevant agencies and co-operating as required with their enquiries regarding safeguarding matters including attendance at case conferences and core group meetings;
- Establishing and maintaining a safe environment in which pupils feel secure, are able to learn and are encouraged to talk freely about anything that concerns them;
- Establishing a culture of listening to and respecting our pupils;
- Ensuring pupils know there are adults in their school who they can approach if they are worried about anything;
- Including opportunities in the PSHE curriculum to develop and equip pupils with the skills needed to recognise risks and stay safe from abuse;
- Supporting pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan;
- Ensuring we respond appropriately to any concern or allegation about a member of staff or volunteer; and
- Ensuring staff follow accepted “safe practice” principles when working with pupils.

If there are safeguarding concerns, the **London Safeguarding Children Board** procedures must be followed (available from the designated teacher). This policy and procedure also accords with:

- DfES guidance – “Keeping Children Safe in Education” (*Sept 2024*) and
- “Working Together to Safeguard Children” (*HM Government, 2019*).

1.1 SAFE PRACTICE

Oak Farm Primary School’s safeguarding practices have been put into place to ensure that our pupils are safe.

All Staff and visitors to the school:

- Have a duty to report any concerns they have about the well-being of children, in writing, to the appropriate Designated Officer;
- Are responsible for their own actions and behaviour and should avoid any conduct which would lead to any reasonable person to question their motives or intentions;
- Should work in an open and transparent way;
- Are required to discuss or take advice from the school’s management on any incident which may give rise for concern.

All visitors to the site fall into two categories; those with the appropriate DBS clearance and those who do not.

If you are a visitor to the School(s):

- and have provided evidence of the appropriate DBS clearance and identity check you may, after registering at the main reception, be able to go about your school business unaccompanied depending on the nature of the visit.
- and do not hold the appropriate DBS clearance, then the person you are visiting will need to arrange for you to be accompanied throughout your visit and at no time left alone after registering at the main reception.

The only exception to this will be after school hours when there are no pupils on site and during the school holidays, when non DBS clearance contractors may be permitted to access the site unhindered.

1.2 PARTNERSHIPS WITH PARENTS

Oak Farm Primary School's purpose is to educate and help pupils keep safe from harm and to have their welfare as our priority.

We are committed to working with parents positively, openly and honestly. We respect parents' rights to privacy and confidentiality and will not share sensitive information with anyone unless we have permission or it is necessary to do so in order to protect the child.

Oak Farm Primary School will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm.

1.3 PARTNERSHIP WITH OTHERS

Oak Farm Primary School recognise that it is essential to establish positive and effective working relationships with other agencies. There is a joint responsibility on all agencies to share information to ensure the safeguarding of all pupils.

If we receive an allegation relating to an incident that happened when an individual or organisation is using our school premises for the purpose of running an activity for children (extra-curricular activities). As with any safeguarding allegation, the school will follow our safeguarding policies and procedure, including informing the LADO.

1.4 RECRUITMENT, SELECTION, TRAINING AND SUPERVISION OF STAFF AND VOLUNTEERS

In our recruitment and selection of staff and volunteers we will at all times adhere to the School's HR Cooperative Recruitment and Selection policies and procedures, and to the appropriate guidance which followed the Bichard Enquiry Report (*Keeping Children Safe in Education, September 2023*). See our *Safer Recruitment Policy*.

In particular, we will ensure that our interview panellists are appropriately trained in Safer Recruitment practices, that we always follow up gaps in previous employment, that we always require specific references from employers for the last five years and that for all posts, paid and voluntary, the appropriate Disclosure and Barring Service checks are conducted.

We keep a central record of all staff with the date and outcome of their DBS status so that at all times staff, pupils and parents can be assured this has been done. Copies of documents used to verify the successful candidates identify, right to work and required qualifications should be kept on personnel files. The schools do not keep copies of DBS certificates, once the original is seen.

1.5 SCHOOL TRAINING & STAFF INDUCTION

Oak Farm Primary School's Designated Safeguarding Leads and Deputies have undertaken and will undertake the necessary training to keep fully informed of current legislation and requirements with regard to child protection and, in particular, will undertake on-going designated officer training by Hillingdon.

All other school staff, including non-teaching staff, will undertake appropriate induction training in their first term at Oak Farm School and then will have further training as and when necessary, but at least annually.

All staff are provided with the school's Safeguarding Policy and informed of the Safeguarding arrangements, including information about identifying abuse and who to refer it to.

All staff are required to abide by the Staff Code of Conduct.

1.6 GENERAL GUIDANCE

As a member of staff (paid or unpaid) we should follow the DfE guidance on appropriate behaviour.

- Set clear standards of appropriate safe behaviour;
- Adopt safer recruitment procedures;
- Protect pupils from discrimination and avoidable harm;
- Treat pupils with respect and dignity;
- Protect pupils from sexual, physical and emotional harm and neglect.

If any member of staff has any concerns regarding the treatment of any pupil in or outside school, they have a duty of care to report it to the appropriate member of staff. It may be possible at some time that they may have a concern regarding a colleague in either school; again they have a duty of care to report this to the Headteacher.

1.7 RELATED POLICIES

The related policies are:

- Whistleblowing Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Anti-bullying Policy
- Attendance Policy
- Equalities Policy
- Accessibility Plan

2. E-SAFETY AND COMPUTER USE

2.1 INTERNET USE

At Oak Farm School, we believe that the use of the internet is integral to education, business and social interaction. Internet use is part of the statutory curriculum and a necessary tool for learning. The school has a duty to provide pupils with quality internet access as part of their learning experience and internet access will be designed to enhance and extend education.

Pupils use the internet widely, both within and outside school, and need to learn how to evaluate Internet information and **to take care of their own safety and security.**

There is always clear guidance in lessons about which applications should be used by pupils. Staff should guide pupils' on-line activities that will support the learning outcomes planned for the pupils'

age and maturity. Pupils will be educated in the effective use of the Internet in research, including the skills of knowledge location, retrieval and evaluation. Pupils will be taught to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.

The school will maintain a current record of all staff and pupils who are granted access to the school's electronic communications. Parents and pupils will be asked to sign and return a consent form for pupil access as part of the Home School Agreement whereby they also agree to abide by the school rules in regard to E-Safety and appropriate internet usage.

When staff and pupils leave the school, their account and rights to specific school areas will be disabled.

2.2 SECURITY OF INFORMATION SYSTEMS

Virus protection will be updated regularly. The security of the school's information systems and users will be reviewed regularly as well as system capacity. Data will be backed up daily and regular archives taken and stored off-site.

Personal data will be recorded, processed, transferred and made available according to the General Data Protection Regulation (May 2019).

2.3 FILTERING AND MONITORING SYSTEMS

Oak Farm School will work with WiBird to ensure that systems to protect pupils continue to be reviewed and improved where necessary. If staff or pupils discover unsuitable sites, the URL must be reported to **DSL and WiBird**. We follow the DfE guidance that sets out that schools and colleges should;

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonable impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs

Any material that the school believe is illegal must be reported to appropriate agencies, such as the Internet Watch Foundation or the Child Exploitation and Online Protection Centre. Both school's broadband access will include filtering appropriate to the age and maturity of pupils.

At Oak Farm School, we have software in place to minimise access and highlight any person accessing inappropriate sites or information – we use software which filters and controls internet access, as well as being part of the LONDON GRID FOR LEARNING, which also filters the internet. This system covers all computers in the school, including staff computers.

The school will take all reasonable precautions to ensure that users access only appropriate material. However, it is not possible to guarantee that access to unsuitable material will never occur via a school computer. Neither the school nor the Local Authority can accept liability for the material accessed, or any consequences resulting from Internet use.

2.4 EMAIL

E-mails sent by staff to external organisations should be checked carefully before sending, in the same way as a letter written on school headed paper. Staff should only use school email accounts as approved by the Senior Leadership Team to communicate with pupils.

Use of inappropriate language in an email will be flagged up through our monitoring system and will result in the account being disabled and the information sent to the Head teacher and the Business Manager who will evaluate an appropriate response.

2.5 SOCIAL NETWORKING, SOCIAL MEDIA AND PERSONAL PUBLISHING

The school will block/filter access to social networking sites unless required for educational purposes. Pupils are not permitted to use their mobile technology on either school site, unless specifically to be used in a classroom for an educational purpose. Where this is the case, pupils will be closely monitored. (Keeping children safe in Education 2023)

As part of the PSHE Curriculum pupils will be advised to:

- never to give out personal details of any kind which may identify them. Examples would include real name, address, mobile or landline phone numbers, school attended, IM and e-mail addresses, full names of friends, specific interests and clubs etc.
- not to place personal photos on any social network space. They will be taught how public the information is and to consider using private areas. Advice should be given regarding background detail in a photograph which could identify the pupil or his/her location e.g. house number, street name or school.

Should a pupil/s choose to distribute images of other pupils which could be deemed inappropriate, they will be subject to appropriate sanctions. Should any photographs be distributed which are obscene or pornographic in nature, then the appropriate school will refer the case to the police and/or Social Services in addition to imposing appropriate sanctions (*see section 3.2 which includes information on Sexting*).

Pupils should not use social networking (for example Twitter, Facebook, MSN Messenger) to make inappropriate or defamatory comments about members of staff. Should this happen then appropriate sanctions will be applied.

Staff should not use social networks to discuss other members of staff or pupils. It would be considered an act of gross professional misconduct should a member of staff use a social networking site to bring the school into disrepute.

Staff should not accept friend invites or communications from pupils on social networking sites. It will be considered a disciplinary matter if staff befriend pupils or are not proactive in ensuring that the security of their online social networking sites is at the highest level.

Staff are forbidden from including pupils in friendships groups on social networking sites as this can potentially lead to a professionally compromising situation (*see Staff Code of Conduct*).

Twitter do's and don'ts – guidance on Twitter Accounts for staff

| Do's | Don'ts |
|--|---|
| Have the school logo as your Twitter icon | Tweets must not contain pupil's full names (please use forename only) |
| Keep the language professional | |
| Use it to promote extra-curricular activities and to congratulate pupils | Don't forget this is in the public domain and anyone can see it. |
| Use it as a reminder of events within your department | |
| Follow similar and relevant Twitter accounts | |

2.6 PUBLISHED CONTENT, ONLINE PLATFORM, PHOTOGRAPHS AND VIDEOS

The contact details on the website should be the school address, email and telephone number. Staff or pupils' personal information must not be published.

The Headteacher will take overall editorial responsibility for publications and ensure that content is accurate and appropriate.

Written permission from parents or carers will be obtained before images and videos of pupils are electronically published.

Pupils' full names will not be used anywhere on the website, particularly in association with photographs and videos.

Video technology is sometimes used in the classroom to record lessons. The focus of this is to assist teacher development and the footage will only be used within the relevant school and not distributed.

CCTV is installed on-site for security purposes and is used to assist with crime prevention and detection and disciplinary matters.

Access to CCTV is restricted to site staff and Senior Leadership Team. Footage in relation to a crime will be distributed when requested by police. All other footage will remain on site.

2.7 CYBER BULLYING

Cyber bullying, as with any form of bullying, will not be tolerated in Oak Farm Primary School. Full details are set out in the school's Anti-Bullying policy.

There are clear procedures in place to:

- support anyone affected by Cyber bullying;
- investigate incidents or allegations of Cyber bullying. Pupils, staff and parents/carers will be advised to keep a record of the bullying as evidence.

2.8 INTRODUCING THE POLICY TO PUPILS, STAFF AND PARENTS

All users will be informed that network and Internet use will be monitored. Safe and responsible use of the internet and technology will be reinforced across the curriculum. Particular attention will be given where pupils are considered to be vulnerable.

The Safeguarding policy will be formally provided to all members of staff. Staff should be aware that Internet traffic can be monitored and traced to the individual user. Discretion and professional conduct is essential. Staff training in safe and responsible Internet use, both professionally and personally, will be provided through Safeguarding training.

Parents' attention will be drawn to the School's E-Safety approach for the school in newsletters, the school's prospectus and on the school's website. A partnership approach with parents will be encouraged.

3 SAFEGUARDING AND CHILD PROTECTION

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

Definition of abuse

An abused child is a boy or girl under 18 years of age who has suffered from, or is believed to be at significant risk of, physical injury, neglect, emotional abuse or sexual abuse.

‘Child abuse and neglect’ is a generic term encompassing all ill treatment of children, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child’s health or development.

Children may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm.

Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

Working Together to Safeguard Children (2018) set out definitions and examples of the four broad categories of abuse which are used for the purposes of registration:

- Physical abuse;
- Emotional abuse;
- Sexual Abuse;
- Neglect.

These categories overlap and an abused child does frequently suffer more than one form of abuse. (See Appendix B for further information about abuse types)

The definition above may be said to assume the guilt of the accused. At the point of allegation, however, guilt has not been established and it is important therefore to be careful to be supportive of all parties involved. Having said this, it is made clear in the documentation that our first priority is the following: **‘The protection of the child must take precedence over the rights of the parents and the welfare of the child must be the paramount concern’.**

3.1 WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED

Everyone working with pupils needs to be familiar with local procedures and protocols for safeguarding their welfare. Adults have a duty to report any child protection or welfare concerns to a designated member of staff. In the case of a child protection issue they should contact the Designated Safeguarding Lead, and for general welfare concerns they should contact the Heads of Year. If there are any doubts, then it is best to speak to the Designated Officer for clarification.

See Appendix A for information about the key staff and Appendix B for signs of the different types of abuse.

3.2 EMERGING ISSUES – FGM, HONOUR VIOLENCE, CHILD TO CHILD ABUSE, CSE, SEXTING, SERIOUS VIOLENT CRIME

Staff will be kept updated through staff meeting/briefings on any emerging issues, for example: Female Genital Mutilation, Child Sexual Exploitation, Honour related violence and child Marriage.

Female Genital Mutilation

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

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

Indications that FGM may have already taken place may include:

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

Oak Farm Primary School follow the Mandatory Reporting of Female Genital Mutilation:

Where a professional, who is subject to the mandatory reporting duty, has either been told by a girl that she has had FGM performed on her or has observed a physical sign appearing to show that a girl has had FGM, s/he should personally report the matter to the police by calling 101.

Staff will also report to the Designated Safeguarding Lead.

Honour based violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), child marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

Breast Ironing

Keeping Children Safe in Education (2023) mentions Breast Ironing, under so-called 'Honour-based Violence'. Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further.

Child on Child abuse

All staff should recognise that pupils or students are capable of abusing their peers and that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

There can be an age imbalance in child on child abuse.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child on child abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

Other forms of child on child abuse are:

- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- Upskirting - upskirting is typically when a photograph is taken under a person’s clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

At Oak Farm Primary School, we believe that all pupils or students have a right to attend school and learn in a safe environment. Pupils or students should be free from harm by adults in their school and other pupils.

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

We will take steps to minimise peer-on-peer abuse by promoting British values, being positive role models and explicit teaching within PSHE, SEAL and P4C curriculums.

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

The allegation:

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

We will support the victims and perpetrators of peer on peer abuse by thoroughly investigating the allegation and liaising with - or even deferring the investigation to – our linked police officer. We will make a final decision about how to act on a case-by-case basis, and will follow our procedures stated within the Behaviour policy.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving pupils or students in the production of sexual images, forcing pupils or students to look at sexual images or watch sexual activities, encouraging pupils or students to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation (Feb 2017) is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group (can be male or female, pupils or students or adults) takes advantage of an imbalance of power (power can be due to age, gender, cognitive ability, physical strength, status, economic resources or sexual identity) to coerce activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It may occur without the child or young person's immediate knowledge e.g. through others copying videos or images they have created and posted on social media. Child sexual exploitation can be a one-off occurrence or a series of incidences over time, and range from opportunistic to complex organised abuse.

Staff should be aware of the key indicators of pupils or students being sexually exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Staff should also be aware that many pupils or students and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

Inappropriate relationships:

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend/Girlfriend:

Abuser groom victims by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Mental Health

All staff at Oak Farm Primary School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or deputy.

Sexting

Sexting is the act of sending an indecent image, often of oneself, to someone else through electronic means. It is a criminal offence to share indecent images of pupils or students. We recognise the increase in both the capability of young people to send indecent images through the use of mobile devices and also of the prevalence of such cases and often, the school is the first agency to have their awareness raised of such an incident having occurred.

At Oak Farm Primary School, we take sexting very seriously and respond by:

- ensuring that the topic is covered during PSHE and also in assemblies to try to prevent or reduce occurrences;
- confiscating any mobile devices which we suspect may contain indecent images of young people – we try not to view images, as far as reasonably practical, and ensure their deletion once the police have concluded their enquiries;
- liaising closely with our linked police officer and the parents or carers whenever an offence takes place, although we work to ensure that the young person is not criminalised, wherever possible;
- working quickly to try and identify whether the image has spread further to try to prevent the image being made available on the internet;
- ensuring we liaise swiftly with other schools in the event that the image has gone further, or if the sexting is between pupils from different schools.

All incidents relating to youth produced sexual imagery will be recorded in the appropriate school in line with UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017)

Should repeat offences occur then in liaison with the police, we will make a joint decision about what action to take, which might include the young person being asked to visit the police station with their parents in order to have a discussion about the incidents. We would never take this decision lightly, but would use it as an opportunity for the young person to realise the seriousness of their behaviour to try to prevent a reoccurrence in the future.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be psychological, physical, sexual, financial or emotional. Pupils or students who witness domestic abuse are also victims. Witnessing domestic abuse can have a lasting impact on a child. Pupils or students can be victims, and perpetrators, in their own relationships too.

Child Criminal Exploitation: County Lines

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

- can affect any child or young person (male or female) under the age of 18 years;

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. It should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Serious violent crime

staff need to know the indicators that may signal that pupils or students are at risk from, or are involved with, serious violent crime. These include:

- Unexplained gifts or new possessions - these can indicate that pupils or students have been approached by or involved with individuals associated with criminal networks or gangs
- Increased absence from school
- Change in friendship or relationships with others or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

Pupils or students and the court system

Pupils or students are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for pupils or students.

Pupils or students

Approximately 200,000 pupils or students have a parent sent to prison each year. These pupils or students are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

3.3 DESIGNATED STAFF RESPONSIBLE FOR SAFEGUARDING

The Designated Safeguarding Lead is responsible for child protection and safeguarding issues. Any member of staff concerned about a pupil should tell the Designated Safeguarding Lead immediately, completing a CPOM record at the earliest opportunity. If the Designated Safeguarding Lead is unavailable, you should speak to the deputy Designated Safeguarding Lead (s). If necessary and a child is at risk of imminent harm if you release them to their family or a case of FGM is suspected, please call the authorities without delay.

The Designated Safeguarding Lead has a responsibility to:

- liaise with the nominated governor, the local authority pupils or students, Police and other agencies on individual child protection cases;
- act as the contact person within their school, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the governing body) are aware of their role;
- complete a MASH form for referrals and submit it to the MASH team (Multi-Agency Safeguarding Hub);
- co-ordinate action within the school on child protection issues;
- discuss individual cases with staff on a “need to know basis” to protect’ s’ right to confidentiality;
- oversee the planning of any curricular or other provision in relation to child protection matters;
- with any other relevant staff (e.g. class teacher), represent the school at child protection meetings and be a member of a “Core Group” if required;
- ensure staff are familiar with this Policy and Procedure, the London Child Protection Procedures, and DfE (*previously DfES*) guidance;
- raise awareness about child protection on an ongoing basis;
- together with the Headteacher and local authority child protection training officer, arrange child protection training for **all** (i.e. including ancillary) staff on an annual basis (and for new staff commencing work between whole school training sessions or absent for such sessions arrange attendance at induction sessions).
- ensure that the Designated Safeguarding Lead and the Safeguarding Team receive update training on a regular basis;

At Oak Farm Primary School, we have a team of staff who all carry responsibilities for Safeguarding. Cases of pupils who are at Child in Need or Child Protection level are shared out among the team. Continuity is created by, wherever possible, ensuring it is the same member of staff from the school who attends the meetings and liaises with other professionals.

The Role of Individual Staff

Everyone in the school must be alert to the possibility that any pupil, regardless of race, religion, culture, class or family background, could be the victim of abuse or neglect and must be familiar with these procedures. Concern about a pupil must be discussed with the Designated Safeguarding Lead immediately so that if necessary, a referral can be made without delay. In urgent situations, referral must not be delayed.

Members of staff should not investigate child protection concerns. This is done by Children’s Social Services or the Police. However, if a pupil says something, it is vital to listen carefully, so you can record and report it accurately. Records will also assist other members of staff who may have concerns.

Members of staff should also be aware that mental health problems can be an indicator of abuse as traumatic childhood experiences can have a lasting impact.

3.4 THE ROLE OF THE GOVERNING BODY

Oak Farm Primary School’s governing body will designate a lead governor for Safeguarding and Child Protection. The lead governor will monitor the school’s safeguarding policy and procedures, liaise with the Designated Safeguarding Lead and report to the governing body.

The governing body is responsible for ensuring that the school's safeguarding policy and procedures are effective and up-to-date. The governing body must receive an annual report on safeguarding and in addition should receive regular reports from the Designated Safeguarding Lead and lead governor.

3.5 CONFIDENTIALITY OF RECORDS

Oak Farm Primary School pupils and their parents have the right to expect that all staff will deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Parents and where appropriate pupils should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a young person. Child protection issues relating to individual cases must not be subject to open discussion in the staff room or elsewhere in the school.

Confidentiality and information sharing will be based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2019) and it is important to remember that The Data Protection Act 2019 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping pupils or students safe. This includes allowing practitioners to share information without consent.' Keeping Children Safe in Education (2023)

Members of staff should also remember not to promise to pupils to keep "secrets" (*see procedure in Appendix C*).

3.6 WORKING WITH PUPILS OR STUDENTS

Oak Farm Primary School recognise that young people who are abused, neglected or who witness either of these things, may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. School may be the only stable, secure and predictable element in the lives of pupils or students at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. Oak Farm School will endeavour to support the pupil through:

- the content of the curriculum;
- the school's ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- the school's behaviour policy which is aimed at supporting vulnerable pupils in the school – the school will ensure the pupil knows that some behaviour is unacceptable but they are valued and not blamed for any abuse which has occurred;
- liaison with other agencies that support the pupil such as social services, the child and adolescent mental health service, the education welfare service and the educational psychology service;
- ensuring that, where a pupil with a child protection plan leaves the school(s), their information and child protection file is transferred to any new school immediately and that the social worker is informed and that there is a clear process for doing this.

3.7 DESIGNATED SAFEGUARDING LEAD ACTION

Contact with the family

Contact with the family should be discussed with the appropriate school's Designated Safeguarding Lead, who may consult Children's Social Care, or the Attendance Officer or School nurse.

In cases where a minor physical injury causes concern, it is usual school practice to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the pupil from harm), the parent or carer should be informed and the matter must be referred to Children's Social Care.

In cases of possible neglect or emotional abuse, the concern is likely to have built up over a period of time. There will probably have been discussion between school staff and the family about sources of

help (e.g. Children's Social Care), but if the concerns persist, the Designated Safeguarding Lead will need to refer to Social Services, and will normally advise the family of this.

Following receipt of any information raising concern, the Designated Safeguarding Lead will consider:

- Any urgent needs of the pupil;
- The Assessment Framework (*see Appendix E*);
- Making an enquiry to find out if the pupil is known to Social Services;
- Discussing the matter with other relevant agencies, if approved;
- The pupil's wishes.

Then decide:

- Whenever possible to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation or place a member of staff or others at risk;
- Whether to make a child protection referral at this stage or call a Team Around the Child meeting or Professional Meeting to consider appropriate support or action.

In cases where there are suspicions of sexual abuse, the Designated Safeguarding Lead will seek immediate advice from the Stronger Families (MASH team) before discussing this with the family.

Action following a Child Protection/Safeguarding Referral

The Designated Safeguarding Lead / member of the Safeguarding team will:

- Make regular contact with the Social Worker involved and stay informed.
- Contribute to a strategy discussion. Provide a report, attend and contribute to any subsequent child protection meeting.
- If a child or pupils or students are made subject to a child protection plan, contribute to the plan, attend Core Group meetings and review the pupil's progress at the Child Protection Conference.
- Where possible, share all the reports with parents prior to the meeting.

Recording

- All records relating to child welfare concerns will be kept on the pupil's file and the file will be kept secure – a chronology of concern is also kept;
- We will keep written records of any concerns about pupils, even where there is no need to refer the matter immediately;
- Information from records will only be used on a "need to know" basis;
- Staff will need to know when a pupil is subject to a Child Protection Plan (previously the Child Protection Register), so they can monitor the pupil's welfare;
- Records relating to the pupils' welfare will remain on the pupil's file as long as the pupil is a pupil at the school;
- When the pupil leaves the school, the new school will be advised in writing that the school's records contain information about child protection concerns even where these are no longer current;

It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal

information required

3.8 CONCERN ABOUT A MEMBER OF STAFF, VOLUNTEER OR GOVERNOR

- Where the subject of a safeguarding concern is a member of staff of the school because that person has engaged in conduct that harmed (or is likely to harm) a child, or if they otherwise pose a risk of harm to a pupil or student the relevant School Designated Safeguarding Lead must report the matter to the school's Headteacher, and it will be dealt with under the Staff Disciplinary Policy. The school Headteacher must inform and take advice from the Schools HR Cooperative.
- Where the subject of a safeguarding concern is the Headteacher, the School's Designated Safeguarding Lead must report the matter to the Chair of the FGB and the appropriate Local Authority Designated Officer. Staff should also go to the Chair of Governors, Charlotte Moore who can be contacted via email; cmoore101.312@lgflmail.org
- It is the responsibility of the Designated Safeguarding Lead, Headteacher or Chair of Governors to always consult with the Local Authority Designated Officer (LADO);
- following consultation, the Headteacher (or Chair of Governors) will decide on appropriate action:
 - immediate referral to the Stronger Families Hub (MASH Team); and/or
 - Consideration of disciplinary proceedings. It is important to bear in mind that although the concern may relate to an individual pupil, other pupils may also be at risk;
 - the procedures in "Keeping safe in Education (DfE 2024) and the LOCAL AUTHORITY LSCB Procedure will be followed in such cases;
 - Where appropriate, consideration will be given to referral of a member of staff to the Secretary of State to consider inclusion of their name on the Vetting and Barring list (list of people prohibited from working with pupils or students in an education setting).

Low level concerns about staff behaviour

At Oak Farm Primary School, we recognise the possibility that adults working in the school may harm pupils or students, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the headteacher. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The headteacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Allegations

It is an allegation if the person has

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or,
- Behaved towards pupils or students in a way that indicates he or she may pose a risk of harm to pupils or students; and/or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with pupils or students (also includes behaviour outside the school)

Allegations will be reported to the LADO 'without delay'. Before contacting the LADO, the school will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with pupils or students;
- having favourites;
- taking photographs of pupils or students on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Our Code of Conduct policy and policy on Dealing with allegations against teachers and other staff outline the procedures to follow when a concern is raised. These will be reviewed this year and may be incorporated into a single document.

ALTERNATIVE PROVISION

When a child is placed with an alternative provision provider, written information will be obtained from the alternative provider that all the appropriate safeguarding checks have been carried out on individuals that work in the establishment.

3.9 PUPILS OR STUDENTS STAYING WITH HOST FAMILIES (HOMESTAY)

Oak Farm School will seek the consent of host families to carry out checks with the appropriate local authority to ensure suitability. In the event that a host family has been the subject of some kind of concern, unless there is a satisfactory resolution, the family will be regarded as unsuitable to receive or continue to host a pupil from overseas.

Oak Farm School will take reasonable steps to ensure that a comparable approach is taken by our companion schools abroad.

3.10 REQUESTS FOR ASSISTANCE BY OTHER AGENCIES

- school staff have a legal duty to assist local authority Children's Social Services or the Police when they are making enquiries about the welfare of pupils;
- information about a pupil must therefore be shared on a "need to know" basis with other agencies;
- when telephone requests for information are received, **always** maintain security by checking the telephone number listing for the caller and calling back to a switchboard number **before** giving information or confirming the pupil is on the school roll;
- always advise the designated teacher about such requests for information;

- requests for attendance at meetings about individual pupils (e.g. child protection conferences) should be notified to the designated teacher, who will arrange preparation of a report and attendance at the meeting;
- reports should contain information about the child's:
 - academic progress
 - attendance
 - behaviour
 - relationships with pupils or students and adults
 - family
 - any other relevant matter;
- reports will be read by the family so should be objective, distinguishing between fact, observation, allegation and opinion

3.11 PUPILS SUBJECT TO A CHILD PROTECTION PLAN

- the school(s) will be told by the relevant local authority Children and Family Social Work Service when a pupil is subject to a Child Protection Plan (previously the Child Protection Register) whether it be the London Borough of Hillingdon or another local authority;
- the name of the key social worker must be clearly recorded on the pupil's record;
- the school will participate fully in the work of Core Groups for these pupils, to assist with the objectives of the Child Protection Plan for the pupil;
- when a pupil is subject to a Child Protection Plan, the relevant school will report all unexplained absences even if only of a day;
- when a pupil is subject to a Child Protection Plan, the relevant school will report all behavioural changes or other concerns to the key social worker; and
- when a pupil who is subject to a Child Protection Plan leaves our school, all the child protection information will be transferred to any new school.

3.12 PUPILS OR STUDENTS WHO ARE LOOKED AFTER AND PREVIOUSLY LOOKED AFTER PUPILS OR STUDENTS

The Designated Teacher for Looked After Children retains responsibility to attend the PEPs and monitor the pupils' progress academically, liaising closely with the member of the Safeguarding Team who is responsible for attending LAC reviews and monitoring the overall well-being of that child. We recognise the Virtual Headteacher within Hillingdon has responsibility to promote the education of pupils or students who have a social worker and work together to monitor progress and provision.

Teaching staff are made aware of the pupils or students who are looked after and where appropriate previously looked after and maintain a responsibility as they do with any child, to monitor their progress and well-being, reporting anything they deem to be a concern to the Designated Safeguarding Lead. All staff must be aware that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after pupils or students safe;

- Appropriately placed staff with responsibilities, such as the Safeguarding Team and SLT are fully aware of contact arrangements for the individuals in relation to birth parents.
- The designated teacher for Looked After Children will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales

- The designated teacher for Looked After Children should also work with the virtual school head to promote the educational achievement of previously looked after children
- The Designated Safeguarding Lead maintains oversight of all LACs and monitors this regularly.

3.13 PRIVATE FOSTERING

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered pupils or students are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered pupils or students are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the appropriate Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The school has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, steps will be taken to verify the relationship of the adults to the child who is being registered.

3.14 ATTENDANCE, ADMISSIONS AND PUPILS OR STUDENTS MISSING or ABSENT FROM EDUCATION

Oak Farm School recognise that attendance is often an indicator of other issues which may well constitute safeguarding concerns, therefore there are strong links between the Designated Safeguarding Lead and the Attendance Officer. Where reasonably possible, we hold more than one emergency contact number for each pupil.

- When admitting pupils to the school, we always ensure that the Local Authority admissions team are aware of any pupils either starting at the school or leaving the school;
- On a daily basis, the Attendance Officer supplies the Senior Leaders with a list of pupils absent from their school;
- Where the school is not informed of a reason for absence, we attempt to make contact with parents/carers to find the reason for the absence;
- If there is a persistent concern in regards to attendance, then we will make a referral to Hillingdon's Participation Team.

- Where concerns about attendance persist, we will refer to MASH or call a TAC meeting to explore the concerns;
- Should pupils be absent for 20 consecutive school days without authorisation, and despite our best efforts, we do not know where that pupil is, we will complete a Children Missing Education form and refer to the Local Authority (*Children Missing Education, Sept 2016*).

3.15 PUPILS OR STUDENTS WITH SEND AND EARLY HELP

Pupils or students and young people with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Pupils or students with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and difficulties may arise in overcoming communication barriers.
- they may be more prone to peer group isolation (including prejudice-based bullying) than other pupils or students

At Oak Farm Primary School, we identify pupils who might need early help, more support to be kept safe or to keep themselves safe by:

- having an internal referral system to the DSL/DDSL who discuss what early help or interventions might be offered to key pupils;
- having a wide network of staff within the Inclusion Team who support pupils with SEND, such as: SENDCo and Learning Support Assistants;
- Training all staff regularly on what they might need to look out for in terms of SEND as well as safeguarding.
- Provide extra pastoral support for these pupils or students where necessary.

3.16 CONTACT BETWEEN STAFF AND PUPILS AND USE OF REASONABLE FORCE

In regards to all pupils, but especially those with special educational needs, staff must understand the needs of the child to avoid situations where force is required

Use of reasonable force means 'using no more force than is needed.' It covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain pupils or students. This can range to guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

There are circumstances when it is appropriate for staff to use reasonable force to safeguard pupils or students. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

3.16 PUPILS OR STUDENTS WHO ARE LGBT

We recognise that pupils or students who are lesbian, gay, bisexual, transgender or perceived to be, may be at greater risk of harm. Pupils or students may be targeted by their peers or might not realise they have a safe space within school to speak out and share concerns.

4. ANTI-RADICALISATION

4.1 CONTEXT AND PRINCIPLES

Oak Farm Primary School are fully committed to safeguarding and promoting the welfare of all its pupils.

As a school we recognise that safeguarding against radicalisation toward violent extremism and terrorism is no different from safeguarding against any other vulnerability and that the most effective way is to promote our shared values and virtues, community responsibility and the celebration of diversity. Therefore, this policy fits within our overall Safeguarding policy as it regarded as an extension to the Safeguarding work which takes place at Oak Farm School.

In democratic societies, "radical" is not an actionable label. People can have radical opinions, change their world view and move from one social network to another. Radicalisation toward violent extremism is a concern, however, for the wellbeing of the general public and the democratic system.

We want our school to be a safe space in which pupils or students and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas, which avoids political indoctrination and secures a balanced presentation of political issues.

The Anti-radicalisation approach, in line with the government's Prevent strategy, supports our beliefs, strategies and procedures to protect susceptible individuals from being radicalised toward extreme ideology and terrorism, by identifying who they are and providing them with support.

4.2 LINKS TO OTHER POLICIES

Our anti-radicalisation approach complements the following policies:

- Safeguarding and Child Protection Policy
- Equality Policy
- Behaviour and Positive Relationship Policy

4.3 DEFINITIONS

In the context of this policy, 'radicalisation' is defined as the act or process by which an individual is persuaded to make fundamental changes to their beliefs so that they come to favour violent extremism or terrorism to achieve fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Extremists often target susceptible individuals -including the young-by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination between women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

4.4 AIMS AND OBJECTIVES

We intend to provide a framework for dealing with issues relating to susceptibility of radicalisation toward extremist ideology.

The objectives are that:

- All governors, teachers, teaching assistants and non-teaching staff will have an understanding of what radicalisation toward extremist ideology and terrorism is and why we need to be vigilant in our school;
- All governors, teachers, teaching assistants and non-teaching staff will know what the school's approach is on anti-radicalisation and will follow the safeguarding guidance when issues arise;
- All parents and pupils will know that the school has policies in place to keep pupils safe from harm and that the school regularly reviews its systems to ensure they are appropriate and effective.

4.5 THE ROLE OF THE CURRICULUM

Our curriculum promotes respect, tolerance and diversity. Pupils or students are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

Our PSHE provision is embedded across the curriculum, and directs our assemblies and underpins the ethos of the school. It is recognised that pupils or students with low aspirations are more susceptible to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

4.6 STAFF TRAINING

- Through INSET opportunities in school we will ensure that our staff are fully aware of:
- the threats, risks and susceptibility that are linked to radicalisation toward extremist ideology;
- the process of radicalisation toward extremist ideology and how this might be identified early on;
- how we can provide support as a school to ensure that our pupils or students are resilient and able to resist involvement in extremist activities;
- The government's PREVENT agenda and how this translates in terms of staff responsibilities in protecting young people.

4.7 INDICATORS

The following observable indicators are manifestations of possible radicalisation toward extremist ideology. Each indicator is just that—it indicates that a person may be radicalising toward extremist ideology; it does not automatically deem them radical and/or a threat.

Key indicators are:

- Change in physical appearance and/or attire
- Disconnecting from previous friendship groups
- Active promotion of an extremist ideology
- Seeking to impose radical or extreme views on others
- Association with known extremist groups

Secondary indicators include:

- Increased incidents of verbal abuse / prejudicial language
- Conflict with peers
- Self-identified feelings of isolation
- Accessing inappropriate material in the internet

In school these will often be manifested in:

- Attitude to authority
- Demotivation about learning
- Changes in friendship groups
- Seeking support / mental health issues
- Damage to property
- Breakdown in parent-pupil relationship

4.8 PROCESS

If a governor, teacher, teaching assistant or member of non-teaching staff has concerns that an individual may be at risk of radicalisation toward extremist ideology they should refer the matter to the appropriate person under the school's Safeguarding Policy.

4.9 EXTERNAL SPEAKERS

If a speaker is to be invited into either school, the member of staff inviting them must take account this policy in considering their suitability, and if in doubt refer the matter to the Headteacher. External speakers must at all times be supervised by a member of the relevant school's staff.

4.10 Channel

The Safeguarding team might make the decision to refer the pupil on to Channel, which is an early intervention multi-agency process designed to safeguard susceptible people from being drawn into extremist ideology. Channel works in a similar way to existing safeguarding partnerships aimed at protecting susceptible people.

The Safeguarding Designate would refer the young person to Channel by referring the young person to MASH, the Multi-Safeguarding Hub. This would be done if it was felt that a young person is susceptible to being radicalised and was showing or sharing views of an extreme or radical nature. This decision to refer would be taken in consultation with other professionals working within the MASH team.

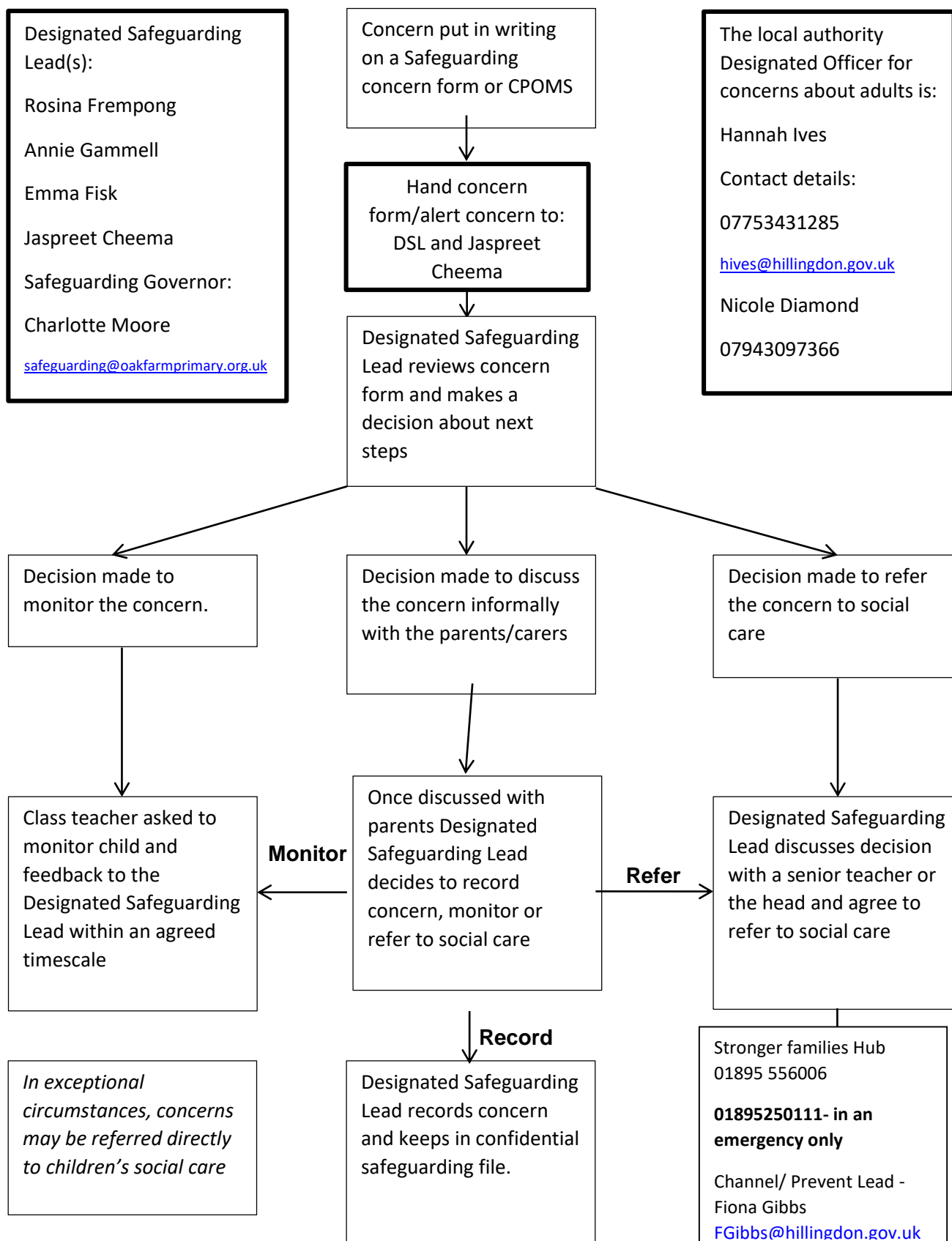
ADDITIONAL MATERIALS

Prevent strategy, GOV.UK – Home Office (Adobe pdf file)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

APPENDIX A

HILLINGDON LOCAL AUTHORITY CONTACT DETAILS:

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



Designated Safeguarding Lead(s):
 Rosina Frempong
 Annie Gammell
 Emma Fisk
 Jaspreet Cheema
 Safeguarding Governor:
 Charlotte Moore
safeguarding@oakfarmprimary.org.uk

Concern put in writing on a Safeguarding concern form or CPOMS

Hand concern form/alert concern to:
 DSL and Jaspreet Cheema

Designated Safeguarding Lead reviews concern form and makes a decision about next steps

Decision made to monitor the concern.

Decision made to discuss the concern informally with the parents/carers

Decision made to refer the concern to social care

Class teacher asked to monitor child and feedback to the Designated Safeguarding Lead within an agreed timescale

Once discussed with parents Designated Safeguarding Lead decides to record concern, monitor or refer to social care

Designated Safeguarding Lead discusses decision with a senior teacher or the head and agree to refer to social care

In exceptional circumstances, concerns may be referred directly to children's social care

Designated Safeguarding Lead records concern and keeps in confidential safeguarding file.

Stronger families Hub
 01895 556006
01895250111- in an emergency only
 Channel/ Prevent Lead - Fiona Gibbs
FGibbs@hillington.gov.uk

APPENDIX B

RECOGNITION OF ABUSE – GUIDANCE FOR PROFESSIONALS

PHYSICAL ABUSE

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating a child.

It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness in a child.

The first indication of concern about a child's welfare is not necessarily the presence of a serious injury. Concerns may be aroused by:

- Bruises or other marks on a child's body
- Remarks made by the child, another child, a parent or another adult
- Observations of the child's behaviour or reactions
- Unexplained changes in the child's behaviour or personality
- Evidence of disturbance or explicit detail in a child's written or diagrammatic work
- Neglect or failure to thrive including failure to gain weight or actual weight loss
- Change in manner of social interaction
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

In an abusive relationship the child may:

- Appear frightened of the parent/carer
- Act in a way that is inappropriate for his/her age and development

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic violence

Bruising

Pupils or students can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile pupils or students rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars, or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to pupils or students that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person
- Imposing developmentally inappropriate expectations
- Causing pupils or students to feel frightened or in danger – e.g. witnessing domestic violence
- Exploitation or corruption of pupils or students

Some level of emotional abuse is involved in most types of ill treatment of pupils or students; though emotional abuse may occur alone.

Emotional abuse may be difficult to recognize, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school pupils or students
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, and includes penetrative (i.e. vaginal or anal rape or buggery) and non-penetrative acts.

It may also include non-contact activities, such as involving pupils or students in looking at or in the production of pornographic materials, watching sexual activities or encouraging pupils or students to behave in sexually inappropriate ways.

Recognising Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualized conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

NEGLECT

Neglect involves 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 and development.

This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of a child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

SELF HARM

For many pupils self-harm is considered to be a means of releasing pain and stress often caused by other aspects of abuse. Pupils will often hide the signs of self-harming by covering their arms and legs, particularly in PE. They may also seem to be excessive with the need to keep their body covered during the hot weather.

Typical signs of self-harming are: -

- Patches of cutting to the arms and legs.
- Deep scratches
- Burns
- Hitting or punching things.

Self-harming can also include the use of alcohol and sexual activity.

DOMESTIC ABUSE:

Domestic Abuse, also known as domestic violence or DV, is a pattern of threatening behaviour, coercive behaviour, control, violence or abuse by one person against another in a home or family setting.

It can happen to anyone - regardless of gender, age or culture - and can exist in any relationship - with partners, ex-partners or relatives.

Domestic abuse can take many forms and includes, but is not limited to:

Physical - Assault, punching, kicking, hitting, forced imprisonment, biting, strangling, burning, dragging, using weapons, throwing objects

Sexual - Rape, sexual assault, forced prostitution, degradation, using objects, forced to watch or act in pornography

Psychological - Verbal or emotional abuse, threats to kill, blaming, mind games, criticism, accusations, jealousy and obsessive behaviours, manipulation, sleep deprivation

Financial - Preventing a person from getting or keeping a job, taking money, not permitting access to or withholding family income

Isolation - Not being allowed to see others, to see who you want, denied any form of contact with family or friends and any other support networks

Domestic abuse is **never** acceptable.

Also known as coercive control, the use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence.

Controlling and coercive behaviour is outlined in Government guidance issued under section 77 of the Serious Crime Act 2015 as part of the Government's non-statutory definition of domestic violence and abuse. It is described as:

- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and

- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim

Coercive control is a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear. This has a significant impact on pupils or students and young people, both directly, as victims in their own right, and indirectly due to the impact the abuse has on the non-abusive parent. Pupils or students may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused.

How does it affect pupils or students?

Pupils or students who witness domestic abuse are being **emotionally abused**. Pupils or students who witness domestic abuse are also victims. Witnessing domestic abuse can have a lasting impact on a child. Pupils or students can be victims, and perpetrators in their own relationships too.

In the majority of reported domestic abuse incidents, pupils or students have either been present in the same or a nearby room.

Pupils or students who witness, intervene or hear incidents are affected in many ways, even after a short time.

Short-term effects:

- Anxiety or depression
- Feeling frightened
- Becoming withdrawn
- Bed wetting
- Running away
- Aggressiveness or behavioural difficulties
- Problems with school, poor concentration
- Difficulty sleeping, emotional turmoil
- Eating disorders or alcohol or drug misuse

Long-term effects

- Lack of respect for the parent
- Loss of self confidence
- An inability to trust and form relationships
- Becoming over protective or feeling responsible for the parent
- Feeling a 'loss of childhood'
- Problems at school, low education attainment
- Running away

APPENDIX C

CHILD PROTECTION DISCLOSURE – guidance for school staff

Disclosures or information may be received from pupils, parents or other members of the public. The school recognises that those who disclose such information may do so with difficulty having chosen carefully to whom they speak.

Accordingly, all staff will handle disclosures sensitively. Such information cannot remain confidential and staff will need to inform the Designated Safeguarding Lead immediately.

DO NOT DELAY

- tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a meeting to do this – do not leave notes in designated person's pigeonhole as they may not get back to check their post until the end of the day once the child has gone home
- early referral gives more time to offer help to the pupil and family before the situation becomes severe or serious
- when the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- the Designated Safeguarding Lead may consult Children's Social Services through Stronger families (MASH Team).

MAKE WRITTEN NOTES

As soon as possible after the event, a brief statement should be written ensuring that the following points have been addressed:

- Who made the disclosure
- The time, approximately, and the date of the disclosure and the events being described
- The nature of the conversation, what may have prompted the disclosure, what was said and by whom. This should be as exact as possible.
- Any injuries that have been observed and their nature. A skin map may be used to detail the injury and its location on the body.
- Facts should be recorded accurately and it should be made clear when an opinion is being expressed and what that opinion is based upon.

CONCERN FROM SOMETHING THE CHILD SAYS

Listen – do not ask questions or interrogate. You may clarify information.

Remain calm – if you are shocked, upset or angry the pupil will sense this and this could stop them from saying more.

Reassure the pupil that they have done nothing wrong – tell them it is all right to talk. Do not express your feelings or judgements regarding any person alleged to have harmed a child.

Do not promise to keep it secret – tell the pupil you cannot keep the matter secret and will need to take advice from someone who can help.

Explain sensitively that you have a responsibility to share this information with the Designated Safeguarding Lead. Explain that only those who need to know will be told.

REFERRAL PROCESS

If a member of staff wishes to make a referral to Social Services or to the Police, they should consult the Designated Safeguarding Lead or deputy who will assist with this. However, referral must not be delayed – if the Designated Safeguarding Lead or deputy is not available, a senior member of staff should be advised and the referral made (Hillingdon MASH 01895 556633). The Multi-Agency Safeguarding Hub will be happy to discuss concerns even if you are not sure at that stage that a referral needs to be made.

REMEMBER:

- if in doubt, consult;
- do not ignore concerns, even if these are vague;
- your first responsibility is to the pupil; and
- if you need help or support to manage your own feelings, this can usually be provided.

APPENDIX D

POLICE DEFINITIONS Definition of Sexual

- Penetration, touching or any other sexual activity will be sexual if...
a reasonable person would consider that it is...

(a) Sexual by nature

(b) Sexual because of its circumstances or purpose

Definition of Touching

(a) with any part of the body (b)

with anything else

(c) through anything

This includes touching of clothing

Definition of Rape

A person commits rape if he intentionally penetrates his penis with another's:

- Vagina
- Anus
- Mouth
- Without their consent
-and he does not reasonably believe they consent

Consent is a question of fact

- The victim can be taken NOT to have consented in certain circumstances. This is called evidential presumption.
- If the victim is under 13yrs, she/he CANNOT CONSENT in the eyes of the law.
- It is sufficient to prove penetration and the child's age.

Assault by 'Penetration'

A person commits this offence if:

- They intentionally penetrate the vagina or anus of another with any part of their body (i.e. fingers into vagina) or anything else (object)
- The other does not consent to the penetration.
- The person reasonably believes that the other does not consent.
- **If the victim is under 13 Yrs., she/he CANNOT CONSENT in the eyes of the law.**

Offence of 'Sexual Touching'

A person commits this offence if:

- They intentionally touch another
- The touching is sexual
- The other does not consent
- The person reasonably believes they do not consent.
- **If the victim is under 13 Yrs., she/he CAN NOT CONSENT in the eyes of the law.**

Maximum sentences that can be imposed

- RAPE: Life imprisonment
- Assault by Penetration: Life imprisonment
- Sexual touching: Victim under 13yrs the max is 14 years' imprisonment, otherwise 10 years.

None of these offences have age limitations, which mean that they can be committed by anybody of any age.

**APPENDIX E
ASSESSMENT FRAMEWORK**

