Eccleston Mere Primary School

Child Protection and Safeguarding Policy



Approved by:	Headteacher / Chair of Governors	**Reviewed on:** October 2026	
Next review due by:	October 2027		

Safeguarding contacts

In an emergency, call 999. If a child is at risk, act immediately. Do not wait for a CPOMS entry, a meeting, parental consent or the availability of the DSL before taking necessary protective action.

School role	Named contact	Contact route
Designated Safeguarding Lead	Mr Ryan Mugan **Headteacher**	01744 734829
Deputy DSL	Mrs Sarah Cain **Deputy Headteacher**	01744 734829
Additional trained safeguarding leads	Mrs Amanda Noblett (SENCO) Mrs Tina Devine Mr Scott Barber **Assistant Headteacher**	01744 734829
Safeguarding governor	Mrs J Burrows	Contact through the school office
Chair of governors	Mrs A Lowry	Contact through the school office; concerns about the headteacher must go directly to the chair or LADO

Service	Contact	Use
Emergency services	999	Immediate danger or emergency
Merseyside Police	101	Non-emergency police matters
St Helens MASH / Contact Cares	01744 676767 option 2	Child protection and children's social care referrals
Emergency Duty Team	0345 050 0148	Children's social care outside office hours

Service	Contact	Use
MASH advice	MASH@sthelens.gov.uk	Non-urgent professional advice; do not use email alone for urgent concerns
St Helens LADO	01744 671252 sthelenslado@sthelens.gov.uk	Allegations or concerns about adults working with children
Education Welfare / CME	01744 676636 cme@sthelens.gov.uk	School's retained local CME contact route
TESSA	01744 673151	Education support and specialist advice
Early Help advice	partnershipcoordinator@sthelens.gov.uk	Advice about local Early Help support
NSPCC whistleblowing advice	0800 028 0285	Concerns about organisational safeguarding failures
Childline	0800 1111	Confidential help for children

The DSL checks external contact routes at each review and when notified of changes. If a contact is unavailable, use the published local authority route or emergency services according to urgency.

Staff reporting process

1. Protect the child. Arrange urgent medical help or call 999 where needed. Listen calmly, take the child seriously and reassure them that they have done the right thing.
2. Report immediately to Ryan Mugan or Sarah Cain. If they are unavailable, contact Catherine Davies or Amanda Noblett. If no safeguarding lead is available, take advice from children's social care and make the necessary referral yourself.
3. Record promptly on CPOMS. Include the date and time, the child's own words, factual observations, who was present, immediate action and who was informed. Do not investigate, ask leading questions or promise secrecy.
4. The safeguarding lead assesses risk and decides the response: school support, Early Help / family help, children's social care and/or police. Record the decision and its reasons, including a decision not to refer.
5. For urgent Level 4 concerns, telephone MASH immediately and follow up using the current Service Request Form within one hour, in line with the published St Helens route. Out of hours, contact the Emergency Duty Team.
6. Follow up. Children's social care should indicate the next action within one working day. Chase an absent response, keep supporting the child and escalate unresolved concerns through the local multi-agency resolution procedure.

Anyone can make a safeguarding referral. A report about an adult working with children follows the staff allegations procedure; a LADO referral does not replace a separate MASH referral about a child's safety.

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Statement of intent

This policy applies to all pupils, including our two year old provision, Nursery and Reception, and to staff, governors, students, volunteers, contractors and visitors. It sets out how we prevent harm, respond to concerns and work with families and safeguarding agencies to protect children.

Eccleston Mere Primary School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

Our school aims

Our safeguarding arrangements support a secure, happy, challenging and rewarding school where every child can develop confidence and fulfil their potential. We promote courtesy, honesty, responsibility, kindness and respect, positive mental health, teamwork and self-esteem. We celebrate success, maintain high expectations and work in partnership with families and the wider community.

Acronyms

Common abbreviations used throughout this policy are explained in Appendix D.

Definitions

The terms “children” and “child” refer to anyone under the age of 18.

For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

- Providing help and support to meet the needs of pupils as soon as problems emerge.
- Protecting pupils from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of pupils’ mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

For the purposes of this policy, “consent” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “sexual violence” refers to the following offences as defined under the Sexual Offences Act 2003:

- Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

- Sexual assault: A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, "sexual harassment" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

For the purposes of this policy, "upskirting" refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification,

or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, "making or sharing of nude or semi-nude images and/or videos" refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

"Deepfakes" and "deepnudes" refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the school's procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, “abuse” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “physical abuse” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, “emotional abuse” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their

developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, "sexual abuse" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, "neglect" is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Education Act 2002 section 175
- Education and Inspections Act 2006 sections 93 and 93A
- Education Act 1996 and School Attendance (Pupil Registration) (England) Regulations 2024
- Human Rights Act 1998

- Childcare Act 2006 and the current Early Years Foundation Stage statutory framework
- School Premises (England) Regulations 2012
- Crime and Policing Act 2026 provisions in force affecting regulated activity
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Skills, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE Working Together to Safeguard Children 2026
- DfE 'Disqualification under the Childcare Act'
- DfE Keeping children safe in education 2026
- DfE 'Working together to improve school attendance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'

- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'

DfE Information sharing to safeguard children and young people (September 2026) is statutory guidance for the section 16LA Children Act 2004 information-sharing duty in force from 30 September 2026.

- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Child sexual exploitation'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE Restrictive interventions, including the use of reasonable force, in schools (April 2026), including statutory recording and reporting provisions

Associated school arrangements

Read this policy alongside our arrangements for attendance and children missing education; behaviour, anti-bullying and child-on-child abuse; online safety and electronic devices; images, data protection and retention; safer recruitment and staff conduct; allegations and low-level concerns; whistleblowing; SEND and medical needs; looked-after children; educational visits, intimate care, physical intervention and remote learning. These may be standalone policies or procedures within another policy. The headteacher ensures their wording and implementation are consistent.

Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.

- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Read and understand at least 'Part one' of KCSIE.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the school's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention.
- Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put pupils at risk of harm.

- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

In addition, teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Ensure that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Ensure that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with the Children Act 2004 requirements to provide information requested for statutory safeguarding functions, including the section 16LA information-sharing duty where applicable.
- Ensure that all staff read at least Part one of KCSIE.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place that enable children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring, seek assurance that the filtering and monitoring standards for schools are being met, and that the effectiveness of filtering and monitoring systems is reviewed at least annually, including that appropriate checks are undertaken on all internet-connected devices and a record of those checks is maintained.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.

Confirm that there are procedures in place to make referrals to the DBS, Teaching Regulation Agency (TRA) and other relevant bodies where required.

- Ensure that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.

- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Ensure that the school has effective arrangements in place for community-based early help and targeted family help, and that staff understand their role in identifying pupils who may benefit from support before statutory intervention.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements, the Data (Use and Access) Act 2025 and the local multi-agency safeguarding arrangements.
- Ensure that appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.

- Ensure that appropriate arrangements are in place to provide effective DSL cover during school hours so that safeguarding concerns can always be responded to promptly.
- Establish robust health and safety and emergency evacuation procedures.

The headteacher has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Provide staff with the appropriate policies and information upon induction.
- Ensure safe recruitment in accordance with KCSIE, section 175 of the Education Act 2002 and the maintained-school staffing requirements.
- Ensure that the school carries out all necessary checks on the suitability of people who serve as members and/or on the governing board.
- Ensure a DBS referral is made promptly when the legal referral duty is met, including when a person would have been removed from regulated activity had they not left.
- Ensuring that appropriate contact with pupils does not prevent staff members from using reasonable force and other restrictive interventions.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place,
- Coordinating the school's approach to community-based early help and targeted family help.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, the DSL or a trained deputy is available during school hours. Face-to-face access is the usual arrangement; in exceptional circumstances,

secure telephone availability is backed by an on-site senior leader and clear referral cover.

- Refer cases:
- To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
- To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
- To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
- To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically, including through community-based early help, family help and statutory services where appropriate.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

- Ensuring that the school knows which pupils have or had a social worker.
- Understanding the academic progress and attainment of these pupils.
- Maintaining a culture of high aspirations for these pupils.
- Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure secure and timely child protection file transfer in line with the transfer arrangements set out in this policy.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

The school will ensure that appropriate arrangements are in place to provide effective DSL cover during school hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely responses to concerns.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Safeguarding education is age-appropriate and accessible through Relationships Education, Health Education, PSHE and other curriculum opportunities. It includes trusted adults, safe and respectful relationships, body privacy, consent in everyday interactions, online safety and how to seek help. Adapt teaching for SEND and communication needs; do not rely on a child's ability to recognise or disclose abuse.

Multi agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will work collaboratively with families and partner agencies to safeguard and promote pupils' welfare, through community-based early help and targeted family help, and by contributing to coordinated multi-agency plans to support children and families.

Where a child may benefit from family help, the school will work with partner agencies and contribute to multi-agency assessments and plans.

The school will allow CSCS from the host LA and, where appropriate, the placing LA, access to pupils to enable them to undertake or consider assessments under sections 17 or 47 of the Children Act 1989.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE, CCE and other forms of extra-familial harm.

The school will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Understanding its role within the local safeguarding arrangements.
- Mutually and constructively challenging other's assumptions in a respectful manner.

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for community-based early help or family help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the pupil and, where appropriate, the rationale for decisions will be recorded.

We follow the St Helens Safeguarding Children Partnership arrangements and the current St Helens Multi-Agency Procedures Manual at https://sthelensscp.trixonline.co.uk/. Relevant pan-Merseyside arrangements include missing from home, child exploitation and preventing the unnecessary criminalisation of looked-after children.

Support before statutory intervention

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Any pupil may benefit from support before statutory intervention; however, staff will be particularly alert to the potential need for community-based early help or family help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have a mental health need.
- Are young carers.
- Are pregnant or are a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Have been repeatedly removed from the classroom.
- Have experienced multiple suspensions.
- Are on a part-time timetable.
- Are at risk of being permanently excluded or are in alternative provision or a pupil referral unit.
- Are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Are at risk of being radicalised into terrorism.

- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of honour or faith-based abuse, such as FGM or forced marriage.
- Are privately fostered.

The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from community-based early help or family help.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where family help or community-based early help is appropriate. This includes liaising with other agencies and arranging a multi-agency family help assessment where appropriate, following local safeguarding partnership procedures.

Staff may be required to support other agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in accordance with local arrangements. All cases will be reviewed regularly and consideration given to referral to CSCS where the child's circumstances do not improve or where the level of risk increases.

Staff will be familiar with the local thresholds for community-based early help, family help, Section 17 (Children in Need) and Section 47 (Child Protection) and will follow local safeguarding partnership procedures when making referrals.

St Helens family support and Levels of Need

Our graduated Early Help offer uses the St Helens Family Support Model and Descriptions of Need. The DSL coordinates the school's contribution, including School Support Meetings, the Early Help Assessment Tool (EHAT), Family Action Meetings and liaison with the Level 2 Panel and TESSA. These local arrangements sit alongside community-based early help and targeted family help under Working Together to Safeguard Children 2026.

Level	Local response	School action
1 Universal	Needs met through family, community and universal services	Whole-school provision and informal support with children and families.
2 Early Help	Additional needs requiring coordinated early support	School Support Meetings; EHAT with family agreement; Family Action Meetings and a reviewed multi-agency plan. Seek Level 2 Panel advice where needed.
3 Child in Need	Complex needs meeting the section 17 Children Act 1989 threshold	Refer through the Service Request Form; contribute to assessment, Child in Need planning and review. Seek and document informed parental involvement in line with the published local route.
4 Child Protection	Reasonable cause to suspect significant harm; section 47 threshold	Immediate MASH / police action as appropriate; participate in strategy discussions, conferences and core groups. Consent is not a prerequisite to protective action.

Level 3 provision is grounded in the statutory section 17 duty and must not be described as wholly non-statutory. Early Help is ordinarily voluntary. The school explains Level 3 concerns and information sharing to parents in line with the local referral process. If a parent refuses engagement or a referral form prevents submission, the DSL contacts MASH directly, records the concern and reassesses risk. Refusal does not prevent necessary safeguarding information sharing or an immediate Level 4 referral. Decisions are based on the child's lived experience, not on consent alone.

There is no requirement to work through every level before referring. Review support regularly; escalate promptly when needs persist or risks increase. Where appropriate, use the partnership's Signs of Safety approach to consider worries, strengths, protective factors and what needs to change.

School attendance and children missing from the school site

Good attendance supports learning and keeps children visible to professionals. We work closely with Education Welfare. Attendance concerns are addressed through

the Attendance Policy and, where relevant, a Child Protection Plan, Child in Need plan, Family Action Meeting or Personal Education Plan.

The school follows up unexpected or unexplained absence promptly on the first day. Staff contact parents and available emergency contacts and alert the DSL when the circumstances raise concern. For a vulnerable child, a proportionate, risk-assessed home visit may be arranged through pastoral staff. Staff follow lone-working arrangements and do not put themselves at risk. If contact does not establish the child's safety, the DSL seeks social care and/or police assistance; a telephone assurance is not always sufficient.

Where a child on a Child Protection Plan is absent without explanation, the DSL informs the allocated social worker / children's social care promptly. The school liaises with carers and the social worker for looked-after children. Staff record enquiries, sightings and decisions on CPOMS where they relate to safeguarding.

Children missing education are children of compulsory school age who are not registered at a school and are not receiving suitable education otherwise. Children who remain on our roll but are absent also require an active safeguarding response. There is no ten-day waiting period for acting on risk or failure to establish a child's whereabouts.

If a child goes missing during the school day, staff immediately alert the headteacher / DSL, check the site and last known location, secure supervision of other pupils and contact police and parents according to the risk. For our young pupils, an unexplained departure is treated as urgent. Staff give police the description, vulnerabilities and last known direction, and seek children's social care involvement where appropriate.

The school's duty of care continues when a child leaves the site. Police coordinate the search, but staff provide information and take proportionate steps to safeguard the child where safe to do so. Staff must not undertake unsafe pursuit or leave other children unsupervised. The incident is recorded and the supervision and risk arrangements reviewed.

Safe collection and parental responsibility

Children are released to an authorised adult known to the school. A collection password and identity checks are used for an unfamiliar authorised collector. In line with school practice, collectors must be aged 16 or over. Parents may authorise

suitably responsible Year 5 and Year 6 pupils to travel independently; these pupils must not collect or take responsibility for younger children.

Parental responsibility, current court orders and any safeguarding concerns are considered before release. Parents are asked to provide current orders; copies are stored securely and originals returned. Staff do not interpret an order beyond its terms. Where collection may place a child at risk, keep the child supervised and seek immediate DSL, social care or police advice rather than assuming parental responsibility requires an unsafe handover.

Abuse neglect and exploitation

All staff will be aware of the indicators of abuse, neglect, exploitation and modern slavery and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

The school will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The school will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of harms outside their families (extra-familial harms).

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.
- County lines.
- Radicalisation.

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues and that risks such as abuse can take place online as well as face to face.

Staff will also understand that child-on-child abuse can occur online and can take the form of:

- Abusive, harassing, misogynistic or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chats.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or deputy if they are unsure about something in relation to abuse, neglect or exploitation.

Prejudice based harm and discriminatory behaviour

Staff challenge and report racism, faith-based prejudice, antisemitism, Islamophobia, misogyny, misandry, homophobic or other discriminatory behaviour, including disability-related prejudice. These behaviours may occur online or in person and can include derogatory language, harassment, threats, exclusion and violence. They must not be dismissed as banter or treated only as a behaviour issue where safeguarding concerns arise.

The DSL considers the harm, pattern of behaviour, power imbalance, vulnerabilities and risks to other children, alongside the school's behaviour and anti-bullying arrangements. Record incidents and safeguarding decisions, provide support for affected children and appropriate intervention for children causing harm, and refer

to social care or police where required. Leaders review patterns and use the curriculum, staff training and pupil reporting routes to prevent recurrence.

Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Child on child abuse including sexual harassment and sexual violence

For the purposes of this policy, "child-on-child abuse" is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

All staff will be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.

- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious physical assault and harm, or threat of harm with a weapon – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence such as rape, assault by penetration and sexual assault – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual making or sharing of nudes and semi-nudes.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their private areas to obtain sexual gratification.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group – this may also include an online element.

Some children may be particularly vulnerable to child-on-child abuse. The school recognises that children with SEND or certain medical or physical health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Staff will recognise that children with disabilities are three times more likely to be abused than their peers and will consider whether additional pastoral or safeguarding support is required.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The school will give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged

perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

The school recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency and seriousness of the behaviour, as well as the needs of all children involved.

Responding to harmful sexual behaviour and sexual violence

Staff take every report seriously, including behaviour by very young children and incidents outside school or online. A child is never blamed for abuse or made to feel that reporting creates a problem. Listen without leading questions, explain who needs to know and write the child's account accurately. Where possible, two staff receive the report, with one being the DSL, but this must not delay listening or protection.

The DSL assesses the child's wishes, age and developmental stage, the nature and pattern of behaviour, any power imbalance, SEND or communication needs, coercion, threats, group involvement and risks to other children. Harmful sexual behaviour is considered on a developmental continuum. Staff seek specialist advice where needed; developmental explanations do not excuse harm. Children displaying harmful behaviour also need safeguarding and support.

For sexual violence, the DSL makes an immediate written risk and needs assessment. For harmful sexual behaviour or harassment, the DSL considers a case-specific assessment. Include the child reporting harm, the child alleged to have caused it, other pupils and staff; consider supervision, classroom and playground arrangements, toilets, travel, clubs and online contact. Review the assessment as information changes and after agency advice. Do not wait for an investigation outcome before making children safe.

The DSL considers the KCSIE response options: manage internally where genuinely appropriate; community-based early help or family help; referral to children's social care; and reporting to police. A report of rape, assault by penetration or sexual assault is passed to police, including where a child is below the age of criminal responsibility. Children's social care is involved where a child has been harmed, is at risk or needs statutory support. The DSL records the chosen routes and their reasons; more than one route may be needed.

Provide separate, proportionate support plans for the children involved, with trusted adults, communication support and access to specialist or mental health services. Protect the reporting child from contact, retaliation and bullying without unnecessarily restricting their education. Consider separating the children while seeking agency advice. Information is shared only with those who need it, with care for anonymity and social media risks. Parents are involved unless this increases risk or conflicts with agency advice.

Safeguarding support continues alongside any disciplinary action and regardless of criminal justice outcomes. An unsubstantiated report is not treated as malicious. If a report is withdrawn or cannot be proved, consider ongoing risk, unmet needs and possible pressure on the child. Review learning, supervision and the curriculum, and keep the arrangements under review with the children and agencies.

Online safety and technology

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, and conspiracy theories.
- Contact - Training will address the risks of harmful online interaction with other users or generative AI applications that simulate this. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as making, sending, or receiving explicit images, including those generated using AI and instances of online bullying.
- Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams.

Any safeguarding concern is reported promptly to the DSL; cyber-security incidents are also reported through the school's ICT support arrangements.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cyber-security Policy. The appropriateness of the school's filters and monitoring systems will be informed by the 'Filtering and monitoring standards', the 'Cyber security standards for schools and colleges', and the risk assessment required by the Prevent Duty. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Safe use of artificial intelligence

Staff and pupils use only AI tools and activities approved through the school's ICT, data protection and safeguarding arrangements. Before approving teacher-facing or pupil-facing use, the headteacher, DSL and relevant ICT and data protection advisers consider age restrictions, suitability, privacy, security, filtering and monitoring, and foreseeable harms. Follow current DfE guidance on generative AI in education and product safety expectations.

Staff must not enter identifiable pupil, family or staff information, safeguarding records, sensitive case details or images into public or unapproved AI tools. Any proposed processing of personal information through an approved tool requires an appropriate lawful basis and the necessary data protection assessment and safeguards, with DPO advice. AI-generated content is checked by a member of staff for accuracy, bias, harmful content and age appropriateness before use.

Pupil-facing use requires appropriate adult supervision and accessible explanations of its limitations. Staff consider risks from chatbots simulating relationships, grooming, misinformation, discriminatory outputs and manipulated or generated sexual imagery. AI must not replace professional safeguarding judgement or confidential reporting. Report safeguarding concerns to the DSL immediately and data or security incidents through the school's established routes. Review approved uses as tools and risks change.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

The school will also review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL and ICT support where appropriate. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained.

Mobile Devices

Pupils may bring a mobile phone to school, with parental permission, where it is needed for their journey to or from school. Parents are responsible for setting expectations for safe and appropriate use during the journey.

Phones must be switched off before pupils enter the school building. They are collected and securely stored at the start of the school day and returned as pupils leave the building. Pupils must not switch on or use their phones until they have left the school premises, unless a member of staff authorises this.

Pupils are encouraged to keep phones out of sight while walking and must not use them when crossing roads. Any concerns involving bullying, inappropriate contact or other safeguarding risks during the journey should be reported to the school.

Bringing a phone to school is a parental decision. The school will take reasonable care of phones collected for storage, but cannot guarantee against loss or damage. Parents are encouraged to avoid sending expensive devices.

Photography and images

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy

and Photography and Images Policy. The headteacher ensures permissions and privacy arrangements are checked, with DPO advice where needed.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

School arrangements for devices and images

Where a pupil has permission to bring a phone for travel, it must be switched off at the school entrance and remain inaccessible throughout the school day. Phones are currently kept in pupils' bags in the ante-room adjacent to the classroom. Staff oversee access to that area and report loss, interference or misuse. The headteacher reviews the security of storage and communicates any change. Pupils must not take photographs on school premises or use phones at school events, including PTA discos, unless an expressly agreed exemption applies.

Pupils use school cameras or tablets under staff supervision. Parental permissions for educational technology and image use are recorded when children join the school and reviewed when circumstances change. Permissions for publication are checked before use; consent is not treated as the only possible lawful basis for every school photograph.

Parents may photograph their own child for personal use where the school permits this, subject to any event restrictions needed to protect children. They are asked not to publish images of other children without the relevant permission. Concerns and complaints should be raised through the school's complaints process; personal information about pupils or staff must not be shared in a way that creates a safeguarding risk.

Staff must not take pupil photographs or videos on personal phones. Approved school devices are used on visits; images are transferred promptly to secure school storage and handled under the retention arrangements. Personal phones are stored securely and used only away from pupils, such as in the staffroom during

breaks, unless the headteacher authorises necessary operational use. Personal devices must not be used for recording children during intimate care.

Making or sharing of nudes or semi nudes

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes and semi-nudes as a safeguarding concern, including where these images are generated by AI.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Making, possessing or sharing indecent images of children may constitute criminal offences, including self-generated, digitally manipulated or AI-generated imagery. All reported nude or semi-nude imagery receives a safeguarding response; the DSL assesses the content and context and follows UKCIS guidance without unnecessarily criminalising children.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

The school's full response to incidents of consensual and non-consensual making or sharing nudes or semi nudes can be found in the Making or Sharing of Nude or Semi-nude Images Policy, including the appropriate reporting routes for both staff and pupils.

Immediate response to nude or semi nude imagery

Staff must not ask a child to show, send or print an image, copy or forward it, or save it to CPOMS. Do not investigate or routinely view the material. Preserve the device or evidence as advised by the DSL without circulating the image. The DSL follows the current UKCIS guidance, undertakes an initial review, protects the children involved and decides whether police and children's social care are needed.

Refer immediately where an adult is involved; there is coercion, blackmail, grooming or concern about capacity to consent; imagery depicts violent or developmentally unusual sexual acts; sexual acts involve a child under 13; or the child is at immediate risk, including suicidal thoughts or self-harm. Concerns involving any primary-aged child warrant particularly careful assessment and prompt safeguarding advice. Any exceptional decision by the DSL to view material must meet the UKCIS criteria and be recorded, including the reasons. Obtain advice before deletion; do not destroy evidence needed for an investigation. Support children to use appropriate image-removal routes without requiring them to re-share the image.

Appropriate physical contact with pupils

The school will not operate a 'no contact' policy. The school will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Physical intervention and reasonable force may be used in limited circumstances and will be managed in line with the school's Physical Intervention Policy.

The school will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around the school or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely.
- Comforting a distressed pupil.
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and any other relevant policy.
- The context and circumstances, including whether other adults are present.
- The individual pupil's age and level of understanding.
- Any other relevant factors, including, but not limited to:
- Whether the pupil has SEND or other vulnerabilities.
- Whether alternative strategies that do not involve physical contact could be used.

Reasonable force and restrictive interventions

The school uses prevention and de-escalation, including Team Teach strategies used by trained staff. Staff who may need to intervene receive suitable training and pupil-specific risk information. Force is used only where lawful, necessary and proportionate, for the shortest time, and never as punishment. Consider communication needs, SEND, trauma, medical risks and reasonable adjustments. The absence of training must not prevent proportionate emergency action to protect a child.

Significant incidents of force and all seclusion or restraint are recorded and reported under the duties applying from April 2026. Record what happened, the reason, duration, techniques, people involved, injuries and follow-up. Provide a written parental report as soon as practicable and ordinarily the same day. Where reporting would be likely to result in serious harm to the child, apply the statutory exception: report to a parent who can safely receive it, or, if none, to the local authority where the child ordinarily resides. For seclusion or restraint, provide parents with a copy of the written record, as required for maintained schools. Check

welfare, obtain medical help when needed and offer pupil and staff support. Leaders review patterns and reduce recurrence.

Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

Pupils potentially at greater risk of harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse, neglect and exploitation. The school will ensure that safeguarding concerns involving these pupils are responded to appropriately, taking account of their individual needs and circumstances.

Pupils who need social workers

Pupils may need social workers due to abuse, neglect, exploitation or complex family circumstances. Their experiences of adversity and trauma may leave them vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Children who are absent from education

The school recognises that pupils who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

The school will respond to concerns relating to attendance in accordance with its Attendance and Absence Policy and Children Missing Education Policy, and will work with CSCS and other agencies where absence gives rise to safeguarding concerns.

Home educated children

Whilst many home educated children receive suitable education, the school recognises that elective home education (EHE) can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will inform the LA of all deletions from the admissions register when a pupil is removed from the school roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Pupils requiring mental health support

The school recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying pupils who may require support, ensuring there is early intervention and the referral concerns where appropriate.

Where support is required, the DSL or deputy will consider whether parents should be informed where doing so will not place the pupil at additional risk. Where safeguarding concerns are linked to a pupil's mental health or emotional wellbeing, the DSL or deputy will liaise with the school's senior mental health lead to ensure the pupil receives coordinated support.

The school will maintain a whole-school approach to promoting positive mental health and wellbeing and will make use of appropriate internal and external support services where required.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously looked-after children can remain vulnerable after leaving care; they are not synonymous with care leavers.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL holds relevant social worker, carer and VSH contacts for looked-after pupils and appropriate support contacts for previously looked-after pupils; personal adviser details are recorded where applicable to a care leaver.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

Young carers

The school recognises that caring responsibilities may have a significant impact on a pupil's attendance, attainment, behaviour and wellbeing.

The school will seek to identify young carers at the earliest opportunity and will work with pupils, families and external agencies to ensure that appropriate support is provided.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware that:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may make it more difficult for pupils to recognise, disclose or report abuse.
- Pupils with SEND may not always recognise that what is happening to them is abuse.
- Pupils requiring intimate care or who are more isolated from others may be at increased risk.
- Pupils may be more dependent on adults for care.
- Pupils may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

When responding to safeguarding concerns involving pupils with SEND, the DSL will liaise with the SENCO and, where appropriate, parents and external agencies to ensure that the pupil receives appropriate support.

The school will also consider whether additional pastoral support or communication support is required.

Pupils with medical conditions

The school recognises that pupils with medical conditions or allergies may require additional safeguarding consideration.

A safeguarding referral will not be made solely because of an incident relating to the management of a pupil's medical condition; however, where concerns indicate that a pupil may be at increased risk of neglect, abuse or exploitation, for example where essential medical information or medication is repeatedly not provided, the school will respond in accordance with its safeguarding procedures.

Pupils will be supported in accordance with the schools Supporting Pupils With Medical Conditions Policy.

Pupils who are lesbian gay or bisexual

The fact that a pupil is lesbian, gay or bisexual is not, in itself, a risk factor for harm; however, the school recognises that these pupils, or those perceived to be lesbian, gay or bisexual, may be more vulnerable to discriminatory bullying.

The school will take appropriate steps to prevent and respond to bullying and ensure that all pupils feel safe, respected and supported.

Pupils who are questioning their gender

The school recognises that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

The school will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils.

The school will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, the school will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where involving parents would constitute a greater risk to the child than not involving them, working in partnership with parents.

Staff listen sensitively and explain confidentiality honestly. Follow the safeguarding procedure where a discussion raises concerns about a child's safety or wellbeing.

The school will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

The DSL will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

Staff do not make changes relating to social transition independently. Requests are considered carefully by the headteacher with the DSL, parents and relevant professional or clinical advice, following KCSIE 2026 and equality and human rights

duties. Full social transition at primary age should be agreed only very rarely. Single-sex facilities and residential accommodation remain subject to the statutory premises requirements; appropriate individual arrangements must preserve safety, privacy and dignity.

A child discussing feelings without requesting changes is treated sensitively. There is no automatic requirement to disclose that conversation where there is no associated safeguarding risk. If involving parents could create greater risk than not involving them, the DSL determines protective action before contact or decisions. Record the reasoning and review agreed arrangements.

Use of the school premises for non school activities

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

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

Extracurricular activities and clubs

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

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

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

Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of AP will be aware that pupils in AP will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This will include written confirmation that the alternative provider will inform the school of any arrangements that may put the pupil at risk.

The school will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs.

The school will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.

AP placement reviews will take place at least half termly to ensure that pupils are regularly attending and the placement continues to be safe and meets their needs.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Visitors and external speakers

All visitors follow the school's entry, identity, sign-in, identification badge and sign-out arrangements. The office or host establishes their purpose, authorisation, access needs and supervision arrangements. Staff challenge unidentified or unauthorised people and report concerns immediately. A badge does not itself establish that someone has been appropriately checked or may have unsupervised access to children.

For professional visitors, such as social workers, educational psychologists and education practitioners, check identity and obtain appropriate assurance of role-relevant DBS checks, including employer confirmation where applicable. Where the employer confirms appropriate checks, staff do not ask to see the DBS certificate. Checks for agency workers, contractors and others undertaking work follow the recruitment provisions applicable to their actual role and access to children. People with no contact with children are unlikely to require a DBS check.

Parents, relatives and other visitors attending events such as sports days are not asked for DBS or barred-list checks or existing certificates simply because they attend. The headteacher determines proportionate escorting, supervision and access restrictions. Where an individual also undertakes a volunteer role, assess that role separately under the volunteer arrangements.

Before inviting a speaker, performer or external organisation, the organising member of staff considers educational value, suitability, age appropriateness and safeguarding risks, including online content and any Prevent concerns. Agree the content, staff supervision and relevant checks in advance. Visitors do not investigate disclosures; they report concerns immediately through the school's safeguarding route.

Work experience

Students and work experience at our school

Visitors undertaking work experience are given safeguarding induction, a named supervisor and clear boundaries. School-age students are themselves children to be safeguarded. They do not provide unsupervised care, intimate care, one-to-one work or independent pupil transport. DBS eligibility is determined by age and duties; a DBS check is not automatically required simply because someone is aged 16 or

17. The school verifies any checks required for eligible adult or trainee roles with the placement provider.

Homestay exchange visits

School arranged homestays in UK

Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School arranged homestays abroad

The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a disabled child, this may amount to private fostering under the

Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

Reporting and responding to concerns about pupils

Our reporting and recording arrangements

When a child makes a disclosure, listen carefully and allow them to speak at their own pace. Avoid shock, judgment and blame. Use only open clarification where necessary; do not repeatedly question the child or investigate. Reassure them that they are being taken seriously, that abuse is not their fault and that help is available. Explain the need to share information with safeguarding staff. Do not promise secrecy or confront the person alleged to have caused harm.

Staff speak immediately to a safeguarding lead and record concerns promptly on CPOMS. The log includes the date and time of the event and disclosure, the child's exact words where possible, factual observations, actions, people informed and any relevant context. Distinguish fact from opinion. The DSL records decisions, referrals and reasons on CPOMS, using the Child Protection category where appropriate and restricting access to those who need it.

Where CPOMS is unavailable, make a dated, signed secure written record, inform the safeguarding lead directly and transfer the record to CPOMS as soon as practicable. Do not leave a concern in an unattended email or assume an electronic alert has been read. Confirm that urgent information has reached the safeguarding lead.

Reporting concerns

Staff members will maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff will always act in the best interests of a pupil when they are concerned about their welfare.

Staff will be aware that data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If there is any doubt about sharing information, staff will speak to the DSL or deputy. Fears about sharing information will not stand in the way of the need to safeguard and promote the welfare of children.

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSL.

Staff will not assume that a colleague or other professional will take action and share information that might be critical in keeping pupils safe. Staff will be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSL with the matter. If, in exceptional circumstances, neither the DSL nor deputy is available, this will not delay action being taken. Staff will consider speaking to a member of the SLT and/or take advice from LA children's social care. In these circumstances, any action taken will be shared with the DSL or deputy as soon as possible.

Determining the appropriate response

Following a report, the DSL or deputy DSL will consider the information provided, the pupil's level of need and any known history before determining the most appropriate course of action.

This may include:

- Managing any support for the pupil internally via the school's pastoral support processes, including considering where doing so does not place the pupil at additional risk, and whether the DSL or deputy should inform parents to further support the pupil's wellbeing.
- Undertaking a family help assessment.
- Making a referral to statutory services, e.g. as the pupil could be in need, is in need or is suffering, or likely to suffer harm.

Where a community-based early help or family help assessment is undertaken, the DSL will normally coordinate the school's involvement with partner agencies. Staff will contribute to assessments, planning and reviews as required. The school will keep all cases under regular review and will request further intervention or make a referral to CSCS where the pupil's circumstances do not improve or where risks increase.

Staff members will be advised to read the DfE's guidance on information sharing to support them in the event that they need to make a decision about sharing information.

Referrals and multi agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to CSCS and/or the police, as appropriate. Referrals will follow the local referral process. Where a criminal offence is suspected, including incidents of sexual violence, the police will be notified without delay.

The reporting and referral process outlined in the DfE's flowchart setting out the actions taken where there are concerns about a pupil will be followed accordingly.

The DSL will be familiar with local safeguarding partnership referral arrangements and will provide advice and support to staff where required. Information will be shared with external agencies in accordance with data protection legislation and the school's confidentiality procedures.

Where the school makes a referral, the DSL will expect to receive confirmation of the LA social worker's decision within one working day. Where this information is not forthcoming, the DSL will follow this up.

If the LA social worker decides to carry out a statutory assessment, the DSL or deputy will do everything they can to support this process, with assistance from relevant staff members as required.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

The DSL will maintain effective liaison with CSCS, the police and other relevant agencies to support the pupil's welfare and ensure that the school does not compromise any ongoing investigations.

The school will not wait for the outcome of a statutory or criminal investigation before taking appropriate action to safeguard and support the pupil. Where statutory intervention is not required, the school will continue to consider appropriate support through community-based early help, family help, pastoral support or other suitable interventions.

Supporting pupils and recording concerns

Where safeguarding concerns arise, the school will ensure that the pupil's wishes and feelings are taken into account and that pupils are given opportunities to express their views. Staff will respond calmly and supportively, ensuring pupils feel listened to, taken seriously and supported.

Discussions with parents will take place where appropriate and where doing so will not place the pupil or others at increased risk of harm. The school will work with parents and partner agencies, where appropriate, to support the pupil's safety and wellbeing.

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded promptly by the DSL or deputy DSL and stored securely in accordance with the school's record management procedures.

Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, trainee teachers, volunteers and contractors will be managed in line with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.

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

Low-level concerns will be handled in line with the school's Low-level Safeguarding Concerns Policy.

School reporting routes and LADO referrals

Report concerns about staff, supply staff, trainees, governors, volunteers or contractors immediately to Ryan Mugan. A concern about Ryan Mugan is reported directly to Mrs A Lowry, chair of governors, or the LADO; do not report it to the headteacher first. If the chair is implicated or unavailable, contact the LADO directly. The school office facilitates confidential contact with the chair without disclosing unnecessary detail.

For allegations that may meet the harm threshold, the case manager contacts the LADO promptly, within one working day, and before starting an internal investigation. Use the current St Helens LADO referral form, send it securely to sthelenslado@sthelens.gov.uk and follow up on 01744 671252 within one day. Where a child may be harmed or at risk, make a separate MASH referral. Call 999 for immediate danger.

Safeguard children immediately; preserve evidence and follow police / LADO advice about informing the adult and investigating. Suspension is considered case by case and is not automatic. The school works with the employing agency or training provider and does not simply cease the placement in place of resolving the allegation.

Low level concerns

A low-level concern is behaviour inconsistent with the staff code of conduct that does not meet the harm threshold; low-level does not mean unimportant. Examples include over-familiarity, favouritism, inappropriate personal-device photography or humiliating language. Report concerns, including self-referrals, to the headteacher promptly. Concerns about the headteacher go to the chair. Where the threshold is uncertain, seek LADO advice.

The headteacher keeps confidential adult-concern records separately from pupil CPOMS records, reviews patterns and refers to the LADO if cumulative concerns meet the threshold. Record the concern, context, source, decisions and action. Retain records under KCSIE and the school's retention schedule. Only appropriate substantiated safeguarding information is included in references; low-level concerns are not routinely included merely because they were recorded.

Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

From 30 September 2026, section 16LA of the Children Act 2004 imposes an information-sharing duty. Where its criteria apply, relevant information must be shared with another relevant person, proactively or on request, when it may assist safeguarding and welfare functions. Any limited exception based on greater detriment to the child must be justified and recorded under the statutory guidance. The DSL records what was shared, with whom, why and the applicable lawful basis; a parent's refusal is not itself a bar to required sharing.

Child protection and safeguarding records are maintained on CPOMS, separately from the ordinary pupil record. Access is controlled through different tiers of permissions according to each member of staff's job role and safeguarding responsibilities. Staff may access only the information necessary to fulfil their

duties. The DSL oversees these arrangements and ensures that permissions are reviewed when responsibilities change or staff leave.

When a pupil moves to another establishment using CPOMS, safeguarding records are transferred securely through the CPOMS transfer facility. Confirmation of receipt is recorded within the system. The DSL oversees the transfer and follows up any transfer for which receipt has not been confirmed.

Where the receiving establishment does not use CPOMS, written safeguarding records are transferred securely to its DSL and signed confirmation of receipt is obtained and retained. Transfers are completed as soon as possible: within five days for an in-year transfer, or within the first five days of the new term. Relevant information is shared ahead of the pupil's arrival where necessary to support their safety and continuity of care. A record of the transfer and confirmation of receipt is retained.

Each transferred child protection file includes a clear, structured summary of current safeguarding concerns, relevant family and school context, ongoing support, agency involvement and any immediate actions needed. Distinguish current risks from historic information and explain the relevance of past concerns. Transfer the full relevant record securely; a summary does not replace it.

When a pupil joins the school, a trained safeguarding lead reviews the received information promptly, seeks clarification from the previous DSL where it is unclear or incomplete, and ensures relevant staff understand the child's current needs. Safeguarding information is used to support the child and must not unfairly disadvantage them. Record the review, any clarification and the agreed actions on CPOMS.

Safer recruitment

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

All volunteers undertaking regulated activity are subject to an enhanced DBS check, including children's barred-list information. The school verifies that the required checks have been satisfactorily completed before permitting the volunteer to undertake regulated activity. Completion of these checks is recorded on the school's Single Central Record (SCR).

The school will determine whether a role constitutes regulated activity in accordance with current legislation and DfE guidance, including the DBS Workforce Guides. This will include staff, volunteers and third-party personnel engaged in regulated activity. Where a role constitutes regulated activity, an enhanced DBS certificate with barred list information will be obtained before the individual begins work.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

The school will also ensure that trainee teachers and other individuals undertaking placements are subject to the appropriate safeguarding and recruitment checks in accordance with KCSIE and the Safer Recruitment Policy.

At least one member of every appointment panel has completed safer recruitment training. Recruitment considers application history and gaps, suitability, verified references and interview evidence. Shortlisted candidates are informed that online due-diligence searches may be undertaken. Verify identity, qualifications where required, right to work, prohibition from teaching where applicable, criminal record / barred-list eligibility and appropriate overseas information before appointment. Governors are checked under maintained-school requirements, including section 128 restrictions relevant to governor eligibility.

From 1 September 2026, supervision no longer exempts qualifying volunteer activity from regulated activity. Assess the actual role, frequency and overnight work, including activity across settings. Obtain the appropriate enhanced DBS and children's barred-list information. Occasional volunteering is assessed separately; barred-list checks must only be requested where legally eligible.

For work covered by the EYFS framework, no staff member or volunteer starts until the required enhanced DBS certificate including barred-list information is received. Any exceptional start elsewhere while an enhanced certificate is pending must comply with KCSIE, include the necessary separate barred-list check and a

recorded supervision risk assessment. Supervision alone cannot cure a missing barred-list check or permit a barred person to work.

The office obtains written confirmation of required checks from supply agencies, verifies the individual's identity on arrival and records the confirmation date on the SCR. Appropriate confirmation is also obtained for council personnel, peripatetic music teachers, coaches, contractors and placement providers. The type of check is determined by the role, not simply by attendance on site.

Childcare disqualification and ongoing suitability

The school applies childcare disqualification requirements to staff and volunteers providing relevant early years childcare or later-years childcare for children under eight, and those directly concerned with its management. This is not a blanket disqualification declaration requirement for every school employee. The headteacher identifies covered roles and uses an appropriate declaration process without seeking information that may not lawfully be requested. A disqualified person must not undertake covered work unless an applicable Ofsted waiver is granted.

Early years safeguarding and intimate care

Our two year old provision, Nursery and Reception follow the current EYFS statutory safeguarding and welfare requirements alongside KCSIE. The EYFS lead and DSL ensure suitable staffing, supervision, required training, qualifications, first aid and safe collection arrangements. Staff and volunteers do not start work covered by EYFS before the required enhanced DBS certificate and barred-list information have been received.

Intimate care is planned around each child's needs, dignity and communication. Explain what is happening, use agreed facilities and safeguards, maintain appropriate visibility and accountability without compromising privacy, and record and report injuries, unusual distress or concerns. Personal cameras and phones are not used. Parents are involved in care planning; a child's necessary care must not be withheld because of toileting needs or disability.

The headteacher makes any required notification to Ofsted or another registration body under the framework applicable to the provision, including allegations of serious harm or abuse and relevant suitability events, within the required

timescales. These notifications do not replace LADO, police or children's social care referrals.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to pupils or placing pupils at risk.

Referral to the DBS

The school will refer an individual to the DBS where the legal duty to do so is met, including where they have harmed, or pose a risk of harm to, a pupil and have been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

Single central record

The school keeps an SCR for all staff, including agency and third-party supply staff and salaried teacher trainees. The SCR identifies the required checks, the date each check was completed and who completed it. Record each check where it applies to the role; document a lawful reason where it does not.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

The school records all volunteers undertaking regulated activity on its Single Central Record (SCR), including confirmation of their identity, enhanced DBS check

and children's barred-list check, together with the relevant dates and verification details. Checks for volunteers whose roles do not constitute regulated activity are determined according to their duties and the relevant risk assessment.

The details of an individual will be removed from the SCR once they no longer work at the school.

Training

School safeguarding training is refreshed at INSET, at least termly, alongside updates as required and at least annually. Induction applies to staff, supply staff, students and volunteers before they begin their duties. All staff read KCSIE Part one in full and confirm understanding; the former condensed Annex A is not a substitute.

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE).
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.

- CCE, CSE, modern slavery and trafficking, including where a referral to National Referral Mechanism may be appropriate.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing community-based early help, family help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

DSL and deputy DSL knowledge and skills are refreshed at least annually, in addition to formal training at least every two years. The headteacher arranges sufficient cover during school hours and appropriate cover for activities outside normal hours and terms. Governors receive induction and regularly updated safeguarding training.

Remote learning and school closure arrangements

The school's Remote Learning Policy supports safeguarding during home learning and closures. The headteacher arranges and communicates DSL cover and contact routes. Staff use approved school systems, maintain professional

boundaries and report online concerns in the usual way. Contact with pupils and families is maintained and recorded, with an individual plan for children at greater risk and liaison with social care where required. Unexplained loss of contact triggers prompt safeguarding enquiries.

Monitoring and review

The DSL and headteacher review this policy at least annually and sooner following relevant changes, incidents or learning. The governing board approves the policy and scrutinises implementation through the safeguarding governor and appropriate reports, maintaining pupil confidentiality. The next scheduled review is October 2027.

Leaders check referral timeliness, case follow-up, CPOMS recording, staff understanding, recruitment and SCR accuracy, vulnerable pupils' attendance, pupil voice, child-on-child abuse responses, restrictive intervention records and online filtering and monitoring. The school contributes to the local section 175 audit and implements agreed actions. Safeguarding systems and related policies are updated together.

Any incident review or investigation follows LADO, police and social care advice. Staff do not independently investigate allegations in a way that compromises statutory enquiries. Changes and learning are communicated promptly. Appropriate reports go to the governing board without unnecessary identifiable case details.

Appendix A Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

The school recognises that many of the safeguarding issues described in this appendix may be facilitated by technology or occur wholly online. Staff will remain alert to online indicators of abuse, exploitation and harm and respond in accordance with this policy.

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Operation Encompass

The DSL receives and acts on Operation Encompass notifications through the agreed local arrangements, shares relevant information with the deputy safeguarding team securely and plans timely support for the child. Notifications are recorded on CPOMS and considered alongside existing concerns. An Encompass notification does not replace a social care referral where the threshold

is met. Staff remain alert to domestic abuse even where no notification has been received.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children in temporary accommodation

Local housing authorities have a duty, subject to the applicable consent requirements, to notify relevant education and health services when a child is placed in temporary accommodation. The DSL receives and acts on notifications through the agreed local route. This is a housing-authority notification duty; it does not replace the school’s safeguarding responsibilities or require the school to wait for a notification before helping a child.

On receiving a notification or learning that a family is in temporary accommodation, the DSL considers the impact on safety, attendance, travel, access to learning, basic needs and emotional wellbeing. Work sensitively with the family, attendance and pastoral staff, the SENCO and relevant agencies to identify practical support and maintain continuity of education. Record relevant concerns, decisions and actions securely on CPOMS and review the arrangements when accommodation changes.

Liaise with the housing authority as appropriate and share necessary information lawfully. Where a child has been harmed or is at risk, make the required children’s

social care or police referral promptly; neither the housing notification process nor a lack of consent for that notification prevents necessary protective action.

Children absent from education

Use the attendance and missing-child arrangements in the main policy. Persistent or prolonged absence can indicate abuse, exploitation or unmet needs; respond promptly and assess risk rather than waiting for a numerical threshold.

Admissions register and removal from roll

Keep admission and attendance registers accurate and use the School Attendance (Pupil Registration) (England) Regulations 2024, including the applicable statutory grounds and notification requirements, rather than the superseded 2006 Regulations. Obtain two emergency contacts wherever possible and record changed addresses, school destinations and expected start dates.

Notify the local authority of non-standard additions and proposed deletions within the required timescale and provide the required pupil, parent, address, destination and legal-ground details. Notify relevant attendance concerns in accordance with the Regulations and local arrangements. Make reasonable enquiries jointly with the local authority where whereabouts or education are unclear.

A child is not removed from roll simply because they have been absent, their whereabouts are unknown, support has failed or a parent does not cooperate. Establish that a statutory deletion ground and all its conditions apply. Where needed, complete joint enquiries and obtain local authority advice. For elective home education, act on the written parental notification and current legal requirements, including any restrictions applying to the child; do not encourage withdrawal to solve attendance, behaviour or SEND difficulties. Continue to refer safeguarding concerns regardless of registration status.

Child abduction and community safety incidents

For the purposes of this policy, “child abduction” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation CCE

For the purposes of this policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, "county lines" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber crime

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.

- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Child sexual exploitation CSE

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.

- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, "modern slavery" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher

has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

Staff consider the child's circumstances and any indicator of FGM risk, without requiring a minimum number of indicators before acting. A single disclosure or concern may require immediate protective action.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.

- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called "'honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the

possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.

- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be

aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and CSCS.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "extremism" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "terrorism" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty". The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been suspended, spent time in AP or permanently excluded from school.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having Previously been a victim or previously perpetrated violence.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with safeguarding partners, CSCS, the police and other relevant agencies where appropriate.

Adult involvement in the making or sharing of nude or semi nude images

The school's full response to the making or sharing of nude or semi-nude images is outlined in the Making or Sharing of Nude or Semi-nude Images Policy.

Sexually motivated incidents

The school will remain aware that not all instances involving the making or sharing of nude or semi-nude images will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents involving the making or sharing of nude or semi-nude images involving adults may also be called "sextortion", where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

Appendix B SEND safeguarding barriers and support

The SENCO and DSL work together to ensure safeguarding information is accessible and concerns are explored. Staff must not assume an injury, distress or change in behaviour is explained by SEND.

Barrier	School response
Communication Difficulties It can be significantly more challenging and unlikely for a child to disclose abuse if they have difficulties with communication.	Speech and language interventions Utilising key members of staff who have good understanding and relationships of that pupil Alternative communication means such as sign language, Makaton, PECs etc.
Behavioural Difficulties Screaming, shouting, emotional distress, marks being ignored, overlooked or failure to investigate if this is considered to be 'regular behaviour for the child'.	Ensure that incidents are questioned and challenged. Understanding behaviours displayed such as triggers, relation to mood. Individual Behaviour Plans Gaining the views, wishes and feelings of the child. Always questioning any marks, bruises etc.
Physical Disabilities Physical disabilities can present a significant barrier for some children as it can limit their independence and personal ability to keep safe.	Always questioning any marks, bruises etc. – never assuming why an injury may be present. Using times such as during personal care to be vigilant against marks and bruises. Ensuring open dialogue and trusting relationships at all times.
Marks and Physical Injuries Assumptions that marks relate to the child's physical disability or individual need without further exploration.	Always questioning any marks, bruises etc. – never assuming why an injury may be present. Seeking advice from external agencies including Children's Social Care.

Barrier	School response
Bullying and prejudice behaviours Children with learning difficulties and/or physical disabilities may be more at risk of bullying and prejudice behaviour. Children with SEND may be more prone to peer group isolation.	Ensuring that equality, diversity and difference is taught to all children throughout school. Challenging and dealing with anti-bullying incidents immediately. Supporting children with forming healthy friendships with their peers.
Cognitive difficulties Some children may have difficulty understanding or recognising abuse.	Ensure PSHE and SMSC lessons are differentiated accordingly. Clear and direct conversations to be had regularly with those who are most vulnerable.

Appendix C Implementation and annual review record

The headteacher and safeguarding governor use this record to confirm that the policy is understood and that practical arrangements remain effective. Outstanding actions are assigned and followed up.

Check	Responsible role	Date or action
Named leads, governors and contact routes confirmed	Headteacher / clerk	
School-day and out-of-hours DSL cover communicated	Headteacher / DSL	
Induction and KCSIE Part one understanding recorded	Headteacher / DSL	
Local referral and consent arrangements checked	DSL	
CPOMS permissions and transfer process reviewed	DSL	
Recruitment checks and SCR audited	Headteacher / office / governor	
Early years suitability and intimate care reviewed	EYFS lead / headteacher	
Filtering and monitoring effectiveness reviewed	Headteacher / DSL / ICT support	
Pupil phone storage and device rules reviewed	Headteacher	
Attendance and missing-child arrangements checked	DSL / pastoral / attendance staff	
Child-on-child abuse and pupil reporting routes reviewed	DSL	
Restrictive intervention recording and reports checked	Headteacher / SENCO	

Check	Responsible role	Date or action
Linked school policies checked and aligned	Headteacher / governing board	
Policy approved and staff updates completed	Governing board / headteacher	

Appendix D Acronyms and reference sources

Acronym	Meaning
AI	Artificial intelligence
AP	Alternative provision
CCE	Child criminal exploitation
CME	Children missing education
CPOMS	School safeguarding recording system
CSCS	Children's social care services
CSE	Child sexual exploitation
DBS	Disclosure and Barring Service
DfE	Department for Education
DPO	Data protection officer
DSL	Designated safeguarding lead
EHAT	Early Help Assessment Tool
EHC plan	Education, health and care plan
EYFS	Early Years Foundation Stage
FGM	Female genital mutilation
HBA	So-called honour-based abuse
HSB	Harmful sexual behaviour
KCSIE	Keeping children safe in education
LA	Local authority
LAC	Looked-after children
LADO	Local Authority Designated Officer
MASH	Multi-Agency Safeguarding Hub

Acronym	Meaning
NRM	National Referral Mechanism
PEP	Personal Education Plan
PLAC	Previously looked-after children; this is not synonymous with care leavers
PSHE	Personal, social and health education
RSHE	Relationships, sex and health education; Relationships Education and Health Education are statutory in primary schools
SCR	Single central record
SEND	Special educational needs and disabilities
SENCO	Special educational needs coordinator
SLT	Senior leadership team
TRA	Teaching Regulation Agency
UK GDPR	UK General Data Protection Regulation
VSH	Virtual school head

National and local reference sources

The policy is read with the current statutory guidance and the local procedures. The following links provide the authoritative sources used for this review in October 2026.

Keeping children safe in education 2026
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Working Together to Safeguard Children 2026
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Information sharing duty guidance September 2026
https://www.gov.uk/government/publications/information-sharing-to-safeguard-children-and-young-people

Regulated activity and the removal of the supervision exemption
https://www.gov.uk/government/publications/working-or-volunteering-in-regulated-activity-with-children

Restrictive interventions guidance April 2026
https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

Children missing education statutory guidance
https://www.gov.uk/government/publications/children-missing-education

Early Years Foundation Stage statutory framework
https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

St Helens Multi-Agency Procedures Manual
https://sthelensscp.trixonline.co.uk/

St Helens safeguarding partnership and local thresholds
https://sthelenssafeguarding.org.uk/scp

St Helens MASH referral route
https://www.sthelens.gov.uk/article/3529/Concerned-about-a-child-s-safety-or-welfare

St Helens Service Request Form
https://www.sthelens.gov.uk/article/11271/CYPS-Service-Request

St Helens LADO route
https://sthelenssafeguarding.org.uk/p/procedures/allegations-against-professionals-and-local-authority-designated-officer-lado