



St James's C of E Primary School

Let Your Light Shine

Safeguarding and Child Protection Policy 2025-2026

Ratified on: 22nd October 2025

Ratified by: Lee Salton-Mclaughlin

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St James's C of E Safeguarding and Child Protection Policy

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1. Useful Contact Information

Role/Agency	Name	Contact
Headteacher	Natalie Sefton	01384 818810 nsefton@st-james.dudley.sch.uk
DSL/Named Prevent lead	Emma Jones	01384 818810 ejones@st-james.dudley.sch.uk
Deputy DSL & Safeguarding team	Emma Jones Laura Plant Sarah Mason Natalie Sefton Sharon Brindley Hannah Scott	01384 818810 safeguarding@st-james.dudley.sch.uk lplant@st-james.dudley.sch.uk smason@st-james.dudley.sch.uk nsefton@st-james.dudley.sch.uk sbrindley@st-james.dudley.sch.uk hscott@st-james.dudley.sch.uk
Family Liaison Co-ordinator	Emma Jones	01384 818810 ejones@st-james.dudley.sch.uk
Chair of Governors	Lee Salton-McLaughlin	01384 818810
Safeguarding Governor	Lee Salton-McLaughlin	01384 818810
Children in care Lead	Laura Plant	01384 818810 lplant@st-james.dudley.sch.uk
On-line Safety Lead	Sarah Mason	01384 818810 smason@st-james.dudley.sch.uk
Attendance Officer	Jodie Jephcott	01384 818810 nsefton@st-james.dudley.sch.uk
The Front Door	Dudley Children's Trust	0300 555 0050
Social Care out of hours	Dudley Children's Trust	0300 555 8574
Designated Officer/LADO	Yvonne Nelson Brown Sukhchandan Kaur	01384 813110 allegations@dudley.gov.uk 01384 813066 allegations@dudley.gov.uk
Prevent Counter-Terrorism Team (CTU)	Community Safety Team	community.safety@dudley.gov.uk CTU_GATEWAY@west-midlands.pnn.police.uk
FGM	Police	101 or 999
Police	Police	101 or 999 or 0845 1135000
Virtual School contact	Andrew Wright	01384 813493 01384 813494
Children missing in Education	EIS	Eis.cs@dudley.gov.uk CSE.Team@dudley.gov.uk
Children missing from home/care	Mo Nasser	Moammer.Nasser@dudley.sch.uk

NSPCC helpline NSPCC Whistleblowing helpline		08085000 0800 0280285
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Children missing from home/care	Mo Nasser	Moammer.Nasser@dudley.sch.uk
Stourbridge Family Hub		Forge Road, Stourbridge 01384 818780

2. Introduction and Definition

At St James's we understand safeguarding and promoting the welfare of children is everyone's responsibility. **EVERYONE** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home. Including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Childrens Social Care National Framework.

At St James's C of E Primary School we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that may worry them.

WE WILL ALWAYS ACT IN THE BEST INTERESTS OF THE CHILD

Definitions:

Safeguarding is what we do for all children and young people to keep them safe whilst in our care. *Child protection* describes the policy and procedures specifically for those young people who are at risk of serious harm or have been seriously harmed.

We use the terms “*must*” and “*should*” throughout the guidance. We use the term “*must*” when the person in question is legally required to do something and “*should*” when the advice set out should be followed unless there is a good reason not to.

For the purposes of this guidance, we, in places, use the term ‘*victim*’. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way.

We, in places, use the term ‘*alleged perpetrator(s)*’ and where appropriate ‘*perpetrator(s)*’. These are widely used and recognised terms and the most appropriate to aid effective drafting of guidance. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

3. Statutory Framework

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

[Keeping Children Safe in Education 2025](#)

[The Education Act 2002](#)

[The Children Act 2004](#)

[Dudley Safeguarding People Partnership](#)

[What to do if you're worried a child is being abused: advice for practitioners](#)

[Information sharing advice for safeguarding practitioners](#)

[Mental Health and Behaviour in Schools: Departmental Advice](#)

[Section 26 of the Counter-Terrorism and Security Act \(2015\)](#)

[The Prevent Duty](#)

[Section 5B of the Female Genital Mutilation Act 2003](#)

[Child and Social Work Act 2017](#)

[Data Protection Act 2018](#)

[Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

[Voyeurism Offences Act 2019](#)

[The Human Rights Act, 1998](#)

[The Equality Act 2010](#)

[The public sector Equality Duty \(PSED\)](#)

[DfE statutory guidance on Children Missing Education](#)

[Keeping children safe in out-of-school settings](#)

[Cyber security standards for schools and colleges](#)

4. Related Policies

This policy relates to safeguarding and child protection concerns and sits within a suite of other safeguarding policies. Our policy applies to all staff (teaching and non-teaching), governors and volunteers, temporary and supply staff working in our school. It will be reviewed at least annually by the Governing Body, and is in line with legislation, local procedures and the expectations of Ofsted which inspects schools' safeguarding arrangements.

Other policies that may be referred to within this policy include:

- Attendance
- Admissions
- Anti-bullying
- Educational Visits
- Code of Conduct
- Behaviour Policy
- Equality
- Management of Allegations
- PSHE
- On-line Safety
- Whistleblowing
- Intimate care
- Physical intervention

5. Our policy aims/ principles and values

Aims

Our policy aims to provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities; to ensure consistent good practice across the school; and to demonstrate our commitment to protecting and supporting our vulnerable children, children who need support through early help, children in need and children who have a child protection plan.

Principles and values

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We maintain an attitude of "it could happen here" where safeguarding is concerned.

We will adopt a 'child-centred' approach to safeguarding and child protection and we will always act in the best interests of our children.

We ensure that everyone is aware of their safeguarding responsibilities.

We provide staff, volunteers and governors with the framework, training and support they need in order to be aware of what to look for in order to identify children who need our help and or protection.

We make every effort to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care.

6. Roles and Responsibilities

Roles and responsibilities of our Governing Body

Our Safeguarding Governor is Mr Lee Salton- McLaughlin.

Our Chair of Governors is Mr Lee Salton- McLaughlin. Our vice-chair is Mrs Sian Morgan.

Our governing body will ensure they comply with their duties under legislation. They will have regard to Keeping Children safe in Education 2022 to ensure that the policies, procedures and training in our school are effective and comply with the law at all times and facilitate a whole school approach to safeguarding. They will ensure that an appropriate senior member of staff is appointed to the role of the Designated Safeguarding Lead.

Our Governors will be subject to an enhanced DBS and section 128 check

Our governing body will ensure that:

a) Safeguarding policies and procedures

- appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare and these are shared with all appropriate persons.
- our safeguarding/child protection policy will reference procedures which are in accordance with government guidance and local safeguarding arrangements; will be updated annually (as a minimum), and be available publicly either via our school website or by other means.
- the above policies and procedures are followed by all staff.
- appropriate safeguarding responses are in place to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- they are aware that the Data Protection Act and GDPR place a duty on organisations to process personal information fairly and lawfully and keep any information they hold safe and secure.
- they receive an annual report regarding safeguarding.
- all staff hold a current DBS.

b) Role of Designated Safeguarding Lead (DSL):

- they appoint an appropriate senior member of staff, from our school leadership team, to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection matters and their role will be made explicit in the job description.

- the DSL (and any agreed deputies) will be given the time, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings and to contribute to the assessment of children.
- the designated safeguarding lead and any deputies will liaise with the local authority and work with other agencies as required. During term time the designated safeguarding lead and or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns.
- the designated safeguarding lead has the responsibility for understanding and checking the filtering and monitoring systems and processes in place.
- the designated safeguarding lead and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years and all members of the safeguarding team will be trained to the same required standard.

c) Multi-agency working

- our school contributes to inter-agency working in line with statutory guidance 'Working together to Safeguard Children 2018' and works with local safeguarding partners to promote the welfare of children and protect them from harm.
- our safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by The Dudley Safeguarding People Partnership. This will include understanding and reflecting local protocols for assessment and The Dudley Safeguarding People Partnership (DSPP) threshold document along with supplying information as requested.
- Information is shared appropriately between professionals and local agencies.

d) Staff Training:

- all staff members undergo safeguarding and child protection training at induction including expectations and responsibilities in relation to filtering and monitoring. This training will be regularly updated. In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively
- our Governing body recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity will therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

e) Online Safety:

- appropriate filters and appropriate monitoring systems are in place on school devices and school networks and take care that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- The filtering and monitoring system used at St James's C of E Primary School is Smooth wall.

f) Opportunities to Teach Safeguarding:

- children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This should include covering relevant issues through Personal, Social, Health and Emotional

education (Jigsaw scheme), Relationships Education (compulsory from September 2020) and British Values.

g) Inspection:

- they are familiar with the Ofsted New Common Inspection Framework and safeguarding: Inspecting safeguarding in early years, education and skills settings.

h) Safer Recruitment:

- in line with part 3 of Keeping Children Safe in Education 2023, they prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Our school has written recruitment and selection policies and procedures in place
- at least one person on any appointment panel has undertaken appropriate safer recruitment training.
- shortlisted candidates are informed that online searches may be done as part of due diligence checks.
- the SCR is monitored to ensure it meets statutory requirements.

i) Managing Allegations:

- there are procedures in place to handle allegations against teachers, headteachers, volunteers and other staff. Such allegations will be referred to the designated officer(s) at the local authority by the appropriate person.
- In cases where the school premises are used by external agencies such as community groups or sports associations, usual procedure in regard to managing allegations should be followed - including informing the LADO.
- procedures are in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed from working (paid or unpaid) due to safeguarding concerns, or would have been had they not resigned.
Our governing body is aware that this is a legal duty and failure to refer when the criteria are met is a criminal offence.

j) Allegations of abuse made against other children:

- our safeguarding/child protection policy includes a specific section regarding child-on-child abuse; procedures to minimise the risk of child-on-child abuse; and sets out how allegations of child-on-child abuse will be investigated and dealt with.

k) The Child's wishes:

- the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Systems and processes will operate with the best interests of the child at their heart.

l) Children in Care:

- staff have the skills, knowledge and understanding necessary to keep children safe and that appropriate staff have the information they need in relation to a child's looked after legal status. the governing body should recognise that children previously in care remain vulnerable and that staff have the skills and knowledge to keep them safe.

- they appoint a designated teacher to promote the educational achievement of children in care and to ensure that this person has the relevant qualifications, experience and appropriate training.
- the designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of children in the school; meet the needs identified in the child's personal education plan and promote educational achievement.

m) Children with Special Educational Needs and Disabilities:

- our safeguarding/child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect or exploitation in children with special educational needs and disabilities.

Roles and Responsibilities of Designated Safeguarding Lead and Safeguarding team

The designated safeguarding lead takes the lead responsibility for safeguarding and child protection (including online safety as well as filtering and monitoring systems). Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility will not be delegated.

Our DSL is Emma Jones.

Our Deputy Safeguarding Officer is Laura Plant (Assistant Head Teacher) and our safeguarding team are Natalie Sefton (Head teacher), Sarah Mason (Deputy Head Teacher), Hanna Scott (SENCo) and Sharon Brindley (wrap around lead)

Our Designated Safeguarding Lead and Safeguarding Team are expected to:

a) Manage referrals:

- refer cases of suspected abuse, neglect or exploitation to Dudley Safeguarding People Partnership as required;
- support staff who make referrals to DSPP;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.
- be aware of 'NPCC - When to call the police' which has been designed to support DSLs to understand when they should consider calling the police and what to expect when they do
- ensure paperwork is completed in a satisfactory manner and stored confidentially
- understand the filtering and monitoring systems and processes in place.

b) Work with others:

- act as a point of reference with the three local safeguarding partners and with other agencies in line with Working Together to safeguard Children;
- be fully engaged, co-operate and included in safeguarding arrangements with the three safeguarding partners;
- liaise with the headteacher to inform of any issues;
- as required, liaise with the case manager and the designated officer(s) at the local authority in all cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;

- act as a source of support, advice and expertise for staff.

c) Training:

- undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead and deputy should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills will be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments);
- understand the assessment process for providing early help and intervention;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school's child safeguarding and child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of vulnerable children, those with special educational needs, children who are (or have previously been) in care and young carers;
- keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- 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, among all staff, in any measures the school may put in place to protect them.

d) Staff knowledge and understanding:

- ensure the school's Safeguarding policies and procedures are known, understood and used appropriately;
- ensure the school's Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the Safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the school or college in this.
- link with DSPP to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- at induction, ensure all staff, volunteers etc are aware of systems within our school which support safeguarding. These should include Safeguarding policy, behaviour policy, staff code of conduct, understanding of filtering and monitoring systems, the role of the DSL including their identity and that of any deputies;
- help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children are experiencing with teachers and school staff; supporting staff to understand the challenges these children might face and identify any additional support that staff could make to best support these children.

e) Safeguarding Records:

- ensure a child's safeguarding record is transferred to any new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained;
- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of the child leaving,

e,g information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives;

- Ensure records are stored confidentially and securely.

f) Availability:

- be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking our designated safeguarding lead (or deputy) will be available in person, there may be occasions, in exceptional circumstance when this is not possible however they may be available via e-mail, phone and or Skype or other such mediums;
- ensure adequate and appropriate cover arrangements will be made for any out of hours/term time activities which may take place. The LA will be informed of up to date contact numbers and e-mail contacts should such activities take place;
- submit a safeguarding report to Governors at least annually (by DSL).

Roles and Responsibilities of all staff

The Teacher Standards (2012) state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We extend this level of duty to include **ALL** of the staff and volunteers who work at St James's C.E Primary school.

This means that:

- **ALL** staff have a responsibility to provide a safe environment in which children can learn;
- **ALL** staff have a responsibility to identify children who may be in need of extra help, including children who may benefit from Early Help, or who are suffering, or are likely to suffer, significant harm. All staff have a responsibility to take appropriate action, working with other services as needed;
- in addition to working with the designated safeguarding lead, staff members should be aware that they may be asked to support social workers to take decisions about individual children;
- during induction all staff members will be made aware of the systems within our school , , which support safeguarding and these will be explained to them as part of their induction. This includes: the safeguarding/child protection policy; the behaviour policy; the staff code of conduct; KCSIE 2022, filtering and monitoring systems in place, the role of the DSL and the names of the designated safeguarding lead and deputies;
- all staff members will receive appropriate safeguarding/child protection updates regularly, but at least annually;
- all staff members will be made aware of the signs of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection;
- staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child and talk to the DSL;
- staff should ensure that if a child has made a disclosure, the child is aware that the information will only be shared with the DSL and other adults who wish to keep them safe, in an age appropriate manner. Under no circumstances, should staff agree to keep information a secret, even if they intend to share it;
- staff should be aware that a child going missing from an education setting is a potential indicator of abuse or neglect. Staff members should follow the school procedures for dealing with children who go missing, particularly on repeat occasions. This includes reporting concerns of absence;
- any member of staff who has a concern about a child's welfare should follow the school's referral process.
- all staff should be aware of the local Early Help process and understand their role in it.

EARLY HELP means providing support as soon as a problem emerges at any point in a child's life. Any child may benefit from Early Help but staff should be particularly alert to the *potential* need for early help for a child who

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

All staff in school are required to have read and understood:

- Keeping Children Safe in Education 2024 Part 1
- Staff Code of Conduct – The St James's Way
- Safeguarding & Child Protection policy
- Behaviour policy

Roles and Responsibilities of Volunteers, Work experience and Students:

A member of the Safeguarding team will explain to volunteers, work experience and students the responsibility of reporting any concerns about children's safety and welfare to the DSL. Further, they will be briefed on the required policies which include code of conduct, behaviour, safeguarding and child protection and the confidentiality standards that we expect from all in our school.

Therefore, volunteers and students have the responsibility to:

- Work within the school's code of conduct, KCSIE 2024, safeguarding/child protection policy and confidentiality/information sharing expectations; and
- Immediately share any concerns about a child's welfare with the DSL.

Parental Responsibilities

At St James's C.E Primary we have an open-door policy where we encourage parents to share any concerns regarding their own children or any other child/children who they feel may be at risk of harm. All concerns will be explored in a sensitive and timely manner. Parents /carers should ensure their child attends school and that they arrive on time and are collected on time. We expect parents/carers to notify us of any changes in family circumstances and inform us of any changes of address and contact numbers.

Children's Responsibilities

In our school we respect our children. The atmosphere within our school is one that encourages all children to do their best and to talk freely about any concerns or worries. We provide opportunities that enable our children to take and make decisions for themselves. Children will always be taken seriously and listened to if they seek help from a member of staff. Our school encourages all pupils to share any worries or concerns with any adult in the school at any time. To support this, there are posters around school which clearly identify members of the safeguarding team.

7. Confidentiality and Information sharing

Our school adopts the principles outlined in Keeping Children Safe in Education 2024, DfE Information Sharing May 2024 and Working Together to Safeguard Children 2023.

We recognise that all matters relating to safeguarding/child protection are confidential. All information and data is stored securely and any information or data is shared on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with other statutory agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. If a child wishes to confide in a member of staff/volunteer and requests that the information is kept secret, the member of staff/volunteer will tell the child, in an appropriate manner to the individual needs of the child, that they cannot promise confidentiality and may need to pass the information on to help keep the child or other children safe.

Where children leave the school, the DSL should ensure that their child protection file is transferred within the first 5 days of the start of a new term so that support is place on their arrival.

If in any doubt about sharing information, staff should speak to the DSL or deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

This policy adheres to the principles under data protection law. For further information please review the school's data protection policy published on the school's website.

Further guidance on data protection and compliance with GDPR can be found in 'Data protection: toolkit for school' on www.gov.uk.

Staff should be aware of the 7 Golden Rules for sharing information which are that the information you share is:

Necessary Proportionate Relevant Adequate Accurate Timely Secure

8. Communication with Parents

Our school will always discuss concerns with parents/carers, where possible, and consent for any referrals should be sought unless to do so would:

- place the child at risk of significant harm or further risk of significant harm;
- place a vulnerable adult at risk of harm; and

- compromise any enquiries that need to be undertaken by children's social care or the police.

The school will endeavour to ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

In the best interests of safeguarding children there may be occasions when the school has to consult with other agencies without a parent or carer's prior knowledge. Our first concern and responsibility is the child's welfare and **we have a duty to protect children first and always**. Such consultation may result in a formal referral which could prompt visits from social care and/or the police. We fully understand that this can be a very distressing set of circumstances. Our school will follow the procedures required by the local authority.

Our school will employ the services of an interpreter if required.

9.Types and signs of abuse

All staff and volunteers should be familiar with the types and signs of abuse and aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

All staff are expected to be vigilant at all times and refer any safeguarding concerns without delay, taking account of the following:

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Some signs:

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non-mobile children
- Injuries in unusual areas or with well - defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive

- Arms and legs kept covered in hot weather
- Reluctance to remove clothing for PE or swimming

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Some signs:

- Physical, mental or emotional development delay
- Abnormal attachment to parents/carer
- Low self-esteem
- Lack of confidence
- Over-reaction to making mistakes
- Fear of new situations
- Fear of parents being contacted
- Self-harm

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

The sexual abuse of children by other children is a specific safeguarding issue in education (see section on child-on-child abuse).

Some signs:

- Aggression
- Withdrawn
- Self-harming, including eating disorders
- Distrust of familiar adult
- Wetting or soiling day and night
- Fear of undressing for sport or swimming
- Sleep disturbances or nightmares
- Apparent secrecy about social activities or special friends
- Inappropriate sexualized conduct
- Drawings of sexual behaviours
- Sexually explicit behaviour

The DSL will have a good understanding of harmful sexual behaviour and will discuss (if necessary) the local response to sexual violence and sexual harassment with the police and the DSSP to prepare any additional necessary policies.

The DSL will be confident that they know what local and specialist support is available to children (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as how to access this support. The DSL will work closely with the police if there are delays in the criminal process. The school will (in most instances) engage with both the victim's and the alleged perpetrator's parents when there has been a report of sexual violence =.

There is no definitive answer if a victim asks the school not to tell anyone about sexual violence or harassment. The school will support children who have reported sexual violence and will make sure that the victim, alleged perpetrator and any witnesses are not bullied or harassed.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some signs:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- neglect of or unresponsiveness to a child's basic emotional needs
- Under weight for age
- Hungry
- Tired
- Poor state of clothing for the child's size, weather or time of year
- Persistently dirty with a body odour
- Frequent lateness or non-attendance
- Compulsive stealing or scavenging
- Poor health and untreated medical problems
- Lack of immunisations
- Frequently missed medical appointments

The list of signs is not an exhaustive list.

If staff recognise any of these signs they should not presume that the child is being abused, but **MUST** report their concerns to the DSL or DDSL.

10. Specific safeguarding issues

Mental Health

Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Staff however are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. School can access a range of advice to help identify children in need of extra mental health support, this includes working with external agencies and our Reflections Team.

Where children have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

Staff should be aware of the range of services available to support children with mental health.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a member of the safeguarding team.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school.

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

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. The school assesses the risks and issues in the wider community when considering the well-being and safety of our pupils. When making a referral to children's social care school will provide as much information as possible as part of the referral process to allow any assessment to consider all the available evidence and the full context of any abuse.

Children Missing from Education

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Staff at St James's C of E Primary are aware that a child going missing in education is a potential indicator of a range of safeguarding possibilities, which may include abuse and neglect, sexual abuse or exploitation, radicalisation and child criminal exploitation. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of and follow the school's attendance policy and procedures for dealing with children missing education. We monitor attendance carefully and address poor/irregular attendance without delay.

Our school has appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. We will always follow up with parents/carers, when pupils are absent from school. To support this, we will always request at least

two up to date contact numbers. If we are unable to contact parents or carers and there are concerns around their absence a home visit will be carried out by the attendance officer and a member of the safeguarding team. If we are still unable to contact parents or carers and have cause for concern, then we may request a safe and well check be carried out by the police.

Our school has an admission and attendance registers and all pupils are placed on both registers. Our school will inform the local authority of any pupil who is going to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

Our school will notify the local authority if it is to remove a pupil from its register for any of the five grounds above. This will be done as soon as these grounds for removal from the register are met, and in any event no later than removing the pupil's name from the register.

Our school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for 12 school sessions or more, within a six week period.

Where a child has been absent for a continuous period of 10 days, without receiving any communication whatsoever from Parent/Carer, a referral will be made to children missing education. During this period, school will continue to follow our policy for making contact including a request for safe and well checks if necessary.

In the event that a parent informs us that a pupil will live at another address, we will record:

- The full name of the parent with whom the pupil will live
- The new address
- The date this move will take place

In the event that a parent notifies us that the pupil is registered at another school or will be attending a different school in the future, we will record:

- The name of the new school
- The date on which the pupil first attended or will be attending that school

We will notify the local authority within 5 days when a pupil's name is added to our admission register and also when a pupil's name is to be deleted from our admission register, providing full details of that child.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- a) in exchange for something the victim needs or wants and/or
- b) for the financial or other advantage of the perpetrator or facilitator and/or
- c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact. It can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, local businesses such as car washes, nail bars and beauty salons, being coerced into moving drugs, or money across the country (county lines), forced to shoplift or pickpocket or to threaten other young people.

As children involved in CCE often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

Some of the following may be indicators of CCE

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

However, staff should also recognise that these signs may indicate that children have been approached by or involved with individuals associated with criminal networks or gangs/serious violent crime.

It is also important to note that both boys and girls being criminally exploited may be at a higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

(a) in exchange for something the victim needs or wants, and/or

(b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

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

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

- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

- Children who appear with gifts or new possessions such as money, clothes, mobile phones etc without plausible explanation,
- Children who associate with other young people involved in exploitation,
- Children who have older boyfriends or girlfriends,
- Children who suffer from sexually transmitted infections or become pregnant,
- Children who suffer from changes in emotional well-being,
- Children who misuse drugs and alcohol,
- Children who go missing for periods of time or regularly come home late,
- Children who regularly miss school or education or do not take part in education,
- Exclusion or unexplained absences from school,
- Gang association and/or isolation from peers/social networks,
- Leaving home/care without explanation and persistently going missing or returning late,
- Excessive receipt of texts/phone calls,
- Inappropriate sexualised behaviour,
- Evidence of/suspicions of physical or sexual assault,
- Relationships with controlling or significantly older individuals or groups,
- Concerning use of internet or other social media,
- Increasing secretiveness in behaviours,
- Multiple callers (unknown adults or peers)
- Self-harm or significant changes in emotional well-being.

Some of these may also be indicators of CCE

The following vulnerabilities can increase the risk of child sexual exploitation, although it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can also occur without any of these issues:

- having a prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment now or in the past (domestic violence, parental substance misuse, mental health issues or criminality)
- recent bereavement or loss
- social isolation or social difficulties
- absence of a safe environment to explore sexuality
- homelessness or insecure accommodation status
- economic vulnerability
- connections with other children and young people who are being sexually exploited
- having a learning or physical disability
- being in care
- family members or other connections involved in adult sex work
- sexual identity

More information can be found in: Child Sexual Exploitation: Definition and a guide for practitioners

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK) using dedicated mobile phone lines or other form of 'deal lines'.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, serious violence (including sexual) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as plugging (where drugs are concealed internally to avoid detection). Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes in school, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

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

Domestic abuse

Domestic Abuse can be defined as

The Behaviour of a person (A) towards another person (B) is "domestic abuse" if—

- (a) A and B are each aged 16 or over and are personally connected to each other, and
- (b) the behaviour is abusive.

(3) Behaviour is "abusive" if it consists of any of the following—

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (any behaviour that has a substantial adverse effect on B's ability to—
 - (a) acquire, use or maintain money or other property, or
 - (b) obtain goods or services.)
- (e) psychological, emotional or other abuse;

The above statutory definition of domestic abuse ensures the different types of relationships are captured, including ex partners and family members. The definition captures a range of different abusive behaviours.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued

statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

At St James's, we recognise that exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children including when they see, hear or experience its effects. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

St James's C.E Primary School is part of Operation Encompass, which is a Police and Education early intervention safeguarding partnership which supports children and young people exposed to domestic abuse. The system ensures that when police are called to an incident of domestic abuse where there are children in the household, they will share intelligence with LA Education reps, who then notify the school's designated safeguarding lead that a child/ren has been or may have been exposed to domestic abuse. This notification will be received by school on the morning that this information is shared by police enabling us to offer support dependent on how the child presents at school that day taking account of their needs and wishes.

Refuge runs the National Domestic Abuse helpline which can be called free of charge 24 hours a day on 0808 2000247. It also has a website which provides guidance and support not only for potential victims but also for friends and loved ones with concerns.

Any disclosures or indicators regarding domestic abuse noticed or identified by staff should be referred to the safeguarding team, using the school's safeguarding procedures, so that support and the appropriate referral can be made.

Homelessness

At St James's, we are aware that a number of our families can experience housing issues, which, if resulting in being homeless or being at risk of becoming homeless, presents a real risk to a child's welfare.

Where we are aware that a child has been harmed or is at risk of harm from this issue, a safeguarding referral will be made by the designated safeguarding lead (or member of the safeguarding team) to the local authority. The designated safeguarding lead (and any deputies) is aware of contact details and referral routes in to the Local Housing Authority so they can also raise concerns or discuss support available with them.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Honour based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamics and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such. Professionals in all agencies and individuals and groups in relevant communities need to be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

If staff have any concerns they must speak to the designated safeguarding lead without delay.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The Serious Crime Act 2015 places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found by clicking here: [Mandatory reporting of female genital mutilation procedural information](#).

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

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

Staff should not assume that FGM only happens outside the UK.

Some warning signs to look out for:

- Difficulty walking, sitting or standing;
- Unusual behaviour after an absence from school;
- A young girl may visit the bathroom more frequently or spend more time than usual in the bathroom;
- A young girl may have frequent, urinary, menstrual or stomach problems;
- Prolonged or repeated absence from school;
- A young girl may try to avoid PE lessons;
- Travel to a country known to practise FGM (School holiday times);
- An Elder family member visiting from a country known to practise FGM;
- Over hearing conversations related to FGM;
- A young girl may disclose, ask questions or ask for advice;
- Reluctance to undergo normal medical examination; and
- Girls that are withdrawn from PSHE or SRE.

Teachers **should** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The

following is a useful summary of the FGM mandatory reporting duty by clicking here [FGM Fact Sheet \(FGM the facts\)](#)

At St James's, staff must also report their concerns and share the information with the DSL following the school's procedures for recording and reporting. The teacher then will be supported by the DSL to fulfil their duty to report FGM cases to the police and social care.

Our staff will contact the police on 101

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk.

Schools and colleges can play an important role in safeguarding children from forced marriage. Our staff are familiar with the issue of forced marriage, Honour Based abuse and FGM.

If staff have any concerns regarding FGM, Forced Marriage and Honour Based abuse they will report to the DSL. The DSL will support the individual to fulfil their duty to report to the police and/or social care.

Preventing Radicalisation and Extremism

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our school's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act

proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme

From 1 July 2015 specified authorities, including all schools, are subject to a duty under the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard" to the need to prevent people from being drawn into terrorism". This duty is known as the **Prevent** duty and is a part of the wider safeguarding obligation.

At St James's C of E Primary we will:

- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology;
- work in partnership with parents, children, families and statutory agencies;
- assess the risk in our local area and as a minimum our DSL and safeguarding team will undertake Prevent awareness training to provide advice and support to other members of staff on protecting children from the risk of radicalisation; and
- ensure that suitable filtering and monitoring is in place. Our pupils are taught to stay safe on-line and on line-safety is integral to the school's IT curriculum.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies outside school;
- evidence of possessing illegal or extremist literature;
- advocating messages similar to illegal organisations or other extremist groups;
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent);
- secretive behavior;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- graffiti, art work or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;
- verbalising anti-Western or anti-British views; and
- advocating violence towards others.

At St James's, we aim to build the children's resilience to radicalisation by providing a safe environment and through particular aspects of the curriculum including SMSC, British Values, PSHE, SRE and Citizenship.

Training on Prevent will be delivered as required to the relevant staff.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. The Government has launched 'Educate against hate' a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

Channel

Channel is a voluntary, confidential programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary

at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required

Our staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at: [Channel Guidance](#). E-learning channel awareness programme for staff is available at: [Channel General Awareness](#).

Child-on-child abuse

At St James's C of E Primary we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children. We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's relevant policy e.g. behaviour policy/ anti-bullying policy.

We also recognise that children can abuse other children and this is referred to as child-on-child abuse. It can take many forms including - but not limited to – • bullying (including cyberbullying, prejudice-based and discriminatory bullying) • abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse') • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) • sexual violence⁹ 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^{9F 10} such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party • consensual and non-consensual sharing of nude and semi-nude images and/or videos¹¹ (also known as sexting or youth produced sexual imagery) • upskirting¹² which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and • initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element). When considering instances of harmful sexual behaviour between children, the school will consider their ages and stages of development.

ALL child-on-child abuse is unacceptable and **all** allegations will be taken seriously. At our school we understand that '**abuse is abuse**' and **should never be tolerated or passed off as "banter" "just having a laugh" or "part of growing up"**.

ALL allegations will be carefully considered and all decisions will be made on a case by case basis in consultations with social care. Referral under safeguarding arrangements may be necessary, key specific considerations will include the age, maturity and understanding of the children and any disability or special needs of the children.

Preventing, assessing and minimising the risks

At St James's , we will minimise the risk of allegations against other children by:

- providing a developmentally age appropriate PSHE, SRE, British Values curriculum which develops children's understanding of acceptable behaviour and keeping themselves safe;
- having systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued;

- delivering targeted work on assertiveness, protective behaviours and keeping safe to those children identified as being at risk;
- developing robust risk assessments & providing targeted work for children identified as being a potential risk to other children; and
- providing training and awareness sessions for staff.
- Recognising that public transport is a potentially vulnerable place

Procedure to record, investigate and manage child-on-child allegations

When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern.

If there is a safeguarding concern:

- the designated safeguarding lead (DSL) will be informed;
- a factual record will be made of the allegation, but no attempt at this stage should be made to investigate the circumstances;
- the DSL should contact social care/multi-agency agency safeguarding hub (MASH) to discuss the allegation and seek advice;
- the DSL will follow through the outcomes of the discussion and make a referral where appropriate.
- The DSL will ensure an 'appropriate adult' to support them and help them in the case of a police investigation or search

If the allegation indicates that a potential criminal offence has taken place, this will be referred to the multi-agency agency safeguarding hub MASH where the police will become involved. Following advice from Social Care and/or the police, parents of both the child being complained about and the alleged victim, should be informed and kept updated on the progress of the referral. The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files.

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual behaviour procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan; and the plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

Support and care for all children involved

At St James's we recognise and understand that child-on-child allegations will be very distressing situations for all concerned - children, family members and staff. We also recognise that both the victim and perpetrator may need support and so will seek to provide any support required by making any necessary referrals for counselling and support services, including use of outside agencies and services where appropriate.

The school recognises that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Allegations against other children which are safeguarding issues

Some allegations may be of such a serious nature that they raise safeguarding concerns. These allegations may include physical abuse, emotional abuse, sexual abuse and sexual exploitation and sexting. Other gender issues that can be prevalent when dealing with child-on-child abuse could, for example, include girls being sexually touched or assaulted or boys being subject to initiation or hazing type violence. It is also likely that incidents may involve older students and their behaviour towards younger students or those who are vulnerable.

It is likely that, to be considered a safeguarding allegation against a child, some of the following features will be found. If the allegation:

- Is made against an older child and refers to their behaviour towards a younger child or a more vulnerable child;
- Is of a serious nature, possibly including a criminal offence;
- Raises risk factors for other children in the school;
- Indicates that other children may have been affected by this child; and
- Indicates that young children outside the school may be affected by this child.

Examples of safeguarding issues against a child could include:

Physical Abuse

- Violence, particularly pre-planned;
- Forcing others to use drugs or alcohol; and
- Initiation and hazing violence.

Emotional Abuse

- Blackmail or extortion;
- Threats and intimidation; and
- Cyber-bullying.

Sexual Abuse including sexting and gender based violence

- Indecent exposure, indecent and inappropriate touching or serious sexual assaults;
- Forcing others to watch pornography or take part in sexting; and
- Initiation and hazing violence.

Sexual Exploitation

- Encouraging other children to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight); and
- Photographing or videoing other children performing indecent acts.

Child on Child Sexual Violence and Sexual Harassment

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. This includes rape, assault by penetration and sexual assault without consent. When considering what is consent, this is about having the freedom and capacity to choose. Consent can be withdrawn at any time.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline as outlined in Keeping Children Safe in Education 2022. Whilst not intended to be an exhaustive list, sexual harassment can include

- Sexual comments, telling sexual stories
- Calling someone sexualised names
- Sexual jokes or taunting
- physical behaviour such as deliberately brushing up against someone
- Displaying pictures of a sexual nature
- Online sexual harassment such as sharing images, unwanted sexual comments and upskirting.

Training on sexual violence and sexual harassment is done with staff as part of their annual safeguarding update. They will be aware that sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Addressing inappropriate behaviour, even if it appears to be relatively innocuous, can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Schools should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of school.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

At St James's, staff are made aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT (or who are perceived to be LGBT) children are at greater risk. Staff are also aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts and upskirting
- Providing a safe space for pupils who are LGBT to speak about and share their concerns

Dismissing or tolerating such behaviours risks normalising them.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the school's safeguarding referral process.

Reports of sexual violence and sexual harassment are likely to be complex and the Department of Education has published detailed advice to support schools which can be found on their website 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges'.

Upskirting

The Voyeurism Offences act, commonly known as the upskirting act came into force in April 2019. Upskirting refers to the action of placing equipment e.g. camera or mobile device beneath a person's clothing (not necessarily a skirt) to take a voyeuristic photograph without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without

underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence and anyone of any gender can be a victim.

Children and the court system

At our school we are aware that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds entitled 'Going to court' which are available on the government website. These guides explain each step of the process and support and special measures that are available. Parents will be signposted to these guides as well as being offered support in school.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be also useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year and at St James's, we are aware that this is an issue that may affect some of our families. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Our school will ensure support is offered to the children to not only promote and maintain their educational achievement, but also emotional support will be offered. The family will also be offered support if required by our Family Support Officer.

NICCO (National Information Centre on Children of Offenders) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. This can be accessed on their website www.nicco.org.uk

Children who have suffered Adverse Childhood experiences (ACES)

Adverse childhood experiences are traumatic events occurring before the age of 18. ACES include all types of abuse, neglect and exploitation as well as parental mental illness, substance use, divorce, incarceration and domestic violence. ACES can impact brain development which in turn impacts functions such as decision making, self-regulation, fear processing, memory and stress management.

A child's experiences of adversity and trauma can leave them vulnerable to further harm as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of selfharm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

Artificial Intelligence

Artificial intelligence is NOT a safeguarding issue in itself but a tool that can impact other safeguarding issues like sexual exploitation.

Artificial Intelligence could aid the following.

- Hacking and scams – text generation tools can write convincing emails and text messages to trick pupils into giving malicious actors access to their accounts
- AI-generated child sexual abuse images – some text-to-image tools could be used to create child sexual exploitation material for sexual gratification or as a means of bullying another pupil
- 'Deepfake' pornography – super-imposing a person's face into pornographic videos for sexual gratification or to humiliate the person being put in the images. AI technology is used to alter the person's facial expressions to make the video look more convincing
- 'Catfishing' and sextortion – criminals can use AI-generated profile pictures to appear younger than they are to befriend and groom children and young people, and then solicit information and/or images from them (e.g. nude or semi-nude photos)
- Fake news and misinformation – text-to-image tools can be used to create convincing fake photos of world events, which could be used to promote certain beliefs (including hateful ones)

11. Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18 if disabled) who is cared for by someone who is not their parent or a 'close relative' in their own home, with the intention it should last 28 days or more. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts, (whether of full blood, half blood, or marriage/ affinity.)

School staff will notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. Our school is aware that we have a legal duty to report any private fostering arrangements that we become aware of to the Local Authority.

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

12. What staff should do if they have concerns about a child

At all times, staff should maintain an attitude of 'It could happen here' when it comes to safeguarding children and ALWAYS ACT IN THE BEST INTERESTS OF THE CHILD.

If staff have any concerns about a child, they can speak to the DSL or a member of the safeguarding team for advice; however all concerns MUST also be put in writing either by use of our electronic system 'CPOMS' or by completion of the safeguarding concern forms which will be found in class files and in the staffroom.

If staff have any urgent concerns about a child's welfare, they should act on them immediately (see flow chart Appendix B) and speak to the DSL or a member of the safeguarding team, who should always be available. However, if in exceptional circumstances, they are not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of SLT and/or take advice from DSPP (number available at the start of this policy). In these

circumstances any action taken should be shared with the safeguarding team as soon as is practically possible.

13. Advice - What to do if a child Discloses

All staff at St James's are able to refer to 'What to do if you are worried a child is being abused' DfE March 2015 and displays around school containing relevant information. Training and advice is also included in the annual level 1 safeguarding training for all staff.

If a child discloses, DO

- Keep an open mind;
- Reassure;
- Listen carefully;
- Recognise that a child is likely to disclose to someone they trust – this could be anyone on the staff –and doing so puts you in a position of trust
- Be supportive and respectful of the child
- Work at the child's pace;
- Ask only open questions in a non-leading way – clarifying the facts, don't interrogate;
- Explain your actions;
- Record accurately and quickly using child's words/action (best practice is to wait until the end of the disclosure);
- Pass all the information on to the DSL, or the safeguarding team immediately/as soon as possible or the same day;
- At all times, keep children and young people safe;
- Treat everyone with respect;
- Follow the school's procedures for reporting safeguarding and welfare concerns;
- Follow the school's procedures for reporting all allegations against staff, carers and volunteers; and
- Look after yourself – ask for support.

DON'T

- Promise confidentiality;
- Interrupt/Interrogate/Investigate;
- Assume e.g. this child tells lies/good imagination;
- Make suggestions about what is being said;
- Speculate or accuse anyone;
- Show anger, shock etc;
- Tell the child to go and speak to someone else;
- Discuss with parent/carers without speaking to the DSL, or a member of the safeguarding team;
- Discuss with any other staff;
- Leave any related written information lying around;
- Jump to conclusions about people's behaviour without knowing the facts;
- Investigate an allegation of child protection concern yourself;
- Make suggestive (what could be seen as suggestive) remarks or gestures, tell jokes of a sexual nature or engage in inappropriate verbal banter with or in front of children and/or young people;
- Believe that safeguarding matters are someone else's business and responsibility – it is... but it's also yours.

14. Recording and reporting concerns and disclosures

If the concern is urgent, staff must speak immediately to a member of the safeguarding team, before following up with a written report. The DSL or a member of the safeguarding team should always be available to discuss safeguarding concerns. If, in exceptional circumstances, they are

not available this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team or taking advice themselves from DSPP (numbers are available in this document and on displays around school).

Best practice is to wait until the end of the child's disclosure, then immediately write a thorough summary. It may be appropriate to make notes. However, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking.

The written report should be via our electronic reporting system 'CPOMs'. Alternatively, there are forms available in the staff room for staff to complete.

Where the report includes an online element, be aware of searching, screening and confiscation advice and UKCCIS sexting advice. The key consideration is for staff not to view or forward illegal images of a child.

The advice contains more detailed guidance on what to do if viewing an image is unavoidable.

The written report should include:

- Details of the child's name, class etc;
- All details of the concerns/behaviour/incident/disclosure;
- Use child's own words;
- Ensure all information recorded is factual and accurate;
- Date and time of recording;
- Who the incident/disclosure was made to;
- Note any other witnesses;
- Use full names of all involved, where possible;
- Do not use abbreviations;
- Chronology of actions – date, place, who and what;
- Include body map, if appropriate
- Signature and date of person recording the incident (if written)

Be aware that any notes/written report could become part of a statutory assessment by Children's social care and/or part of a criminal investigation.

Time frame – In cases where there has been a disclosure, the form/report MUST be handed in to a member of the safeguarding team as soon as possible but definitely by the end of the school day. In cases where there is no immediate concern, an electronic concern should be raised or a school reporting form should be placed in the concerns box located in the staff room.

Flow charts are displayed around school to assist staff to follow the correct procedure when reporting concerns about a child.

Remember your responsibility:

Recognise Respond Report Record

15. Making a referral to Social care

Anybody can make a referral, although, at school, consultation should take place with the DSL or designated deputy, who will often be the most appropriate person to initiate any referral. A written record of the initial concerns will have been made either by using the schools electronic recording system, CPOMs, or our internal written recording form. This will then be used to aid in the decision making process if a referral is needed to Children's Trust.

If, a child is in immediate danger or is at risk of harm a referral will be made to children's social care and/or the police immediately. A request for help and support form (found on DSPPs website) will need to be completed following this contact.

If the child is in no immediate danger but we still have child protection concerns we will complete a Request for help and support form as soon as possible and within a maximum of 24 hours.

If there are concerns about a child or young person's emotional or physical safety and/or we believe they have disclosed physical/emotional/sexual abuse, and the risk is not immediate, then the DSL or a member of the safeguarding team will phone 0300 555 8574 (available outside normal office hours) and speak to the DSPP 'Front Door'. Any action will again need to be followed up with a written confirmation on the Request for help and support form within 24 hours.

An alternative contact is the NSPCC helpline 0808 800 5000.

16. Response to a concern or disclosure – safeguarding team, including Section 17/47

Upon receipt of a concern, whether electronically or written, the DSL or designated deputy will make a decision based on DSPP threshold document and, where necessary, seek advice to determine whether the concern/disclosure meets the threshold for support.

The DSL or deputy will consider whether this is a child with unmet needs where health, development or achievement may be affected and whether this need can be met with the completion of an Early Help Assessment (EHA).

Best practice is that Parents/Carers are informed of any referral unless doing so puts the child at risk of significant harm.

If this is a child with additional needs that can be managed under the Early Help process, the DSL or deputy will discuss the issues with the child's parents/carers. The DSL will obtain parental consent for an Early Help Assessment to be completed.

If it cannot be managed under the Early Help process, we will consider - is this a child in need?

Section 17 of the Children Act 1989 says a child in need is defined as:

a child who is unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development; the child's health or development is likely to be impaired, or further impaired without the provision of such services; the child has a disability.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

We will also consider - Is this a Child Protection matter?

Section 47 of the Children Act 1989 states that Child Protection may be needed for:

children at risk or who are suffering significant harm; children suffering the effects of significant harm; children with serious health problems.

If the threshold for the above are met, then the DSL or deputy will make a referral using the correct channels, usually with a telephone call and a MARF referral to the local authority. However, it is important to recognise that anybody can make a referral where they believe a child to be in imminent danger or at risk of harm and in the event that a member of staff wishes to make a referral themselves, they can contact the local authority on 0300 555 8574.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect and exploitation, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

Where a case reaches the 'significant harm' threshold that justifies statutory intervention into family life a professional making a child protection referral under Section 47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm.

It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which impair the child's physical, psychological and social development. In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

17. Voice of the Child

A system will be in place and well promoted for children to confidently report abuse knowing their concerns will be treated seriously.

Children's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Staff members do not promise confidentiality and always act in the best interests of the child.

18. Record Keeping

At St James's, most records of concerns and safeguarding/child protection files are stored electronically on the safeguarding recording system "CPOMs". Where this is not possible, for whatever reason, or for historical cases, the records are kept in a file separately from the child's school file. These are locked in a secure location.

If a child moves school, a member of the safeguarding team will contact the new school to advise them of the need to transfer our records. Our school will then transfer the files either electronically or in person. If it is not possible to transfer by either of these methods, an alternative secure method of transport will be used. When transferring records electronically the system will indicate a successful transfer. In cases where hard copies of the records are transferred in person, our school will obtain a receipt from the receiving school.

19. Children in care and the Virtual School

Our Children in care lead is Laura Plant.

Our CIC lead will undertake any relevant training to update their skills, understanding and knowledge enable them to keep our looked after children safe and will promote the educational, physical, social and emotional welfare of children who are looked after.

Our CIC Lead will ensure:

- they are aware of the legal status (interim care order, full care order, voluntary arrangements) of any looked after child at St James's C.E Primary School;
- they obtain information regarding, contact arrangements with birth parents or those with parental responsibility;
- they obtain information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him or her;
- they obtain the name of the child's social worker;
- they obtain the name and contact details of the virtual head in the local authority that looks after the child;
- they liaise with the virtual school headteacher to discuss how the funding for that child can be best used to support the child's need outlined in the personal education plan;
- that appropriate induction procedures are in place and
- they promote the educational achievement of our looked after children.

We also recognise that a child that has previously been in care continues to remain potentially vulnerable and all staff should have the skills, knowledge and understanding to keep them safe. It is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The role of the virtual school head:

In offering advice and information to workforces that have relationships with children with social workers, virtual school heads should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children.

20. Children with special educational needs and disabilities

At St James's, both staff and the governing body are aware that children with special educational needs and disabilities may face additional safeguarding challenges. Pupils with SEND are 3 times more likely to be abused than their peers. Barriers can exist when recognising abuse, neglect and exploitation in this group of children and any abuse involving pupils with SEND will require close liaison with the DSL.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying-without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

We identify pupils who might need more support to be kept safe or to keep themselves safe and ensure we have appropriate mechanisms in place to assist these children.

Examples of these mechanisms:

- Suitably qualified professionals (SENCO/ individual staff)
- Suitable training
- Referrals to specialist agencies
- Use of communication packages
- Use of signs and symbols
- One to one support for communication
- Appropriate IT aides

There may also be occasions when it is necessary to use reasonable force in response to risks presented by children with SEN, disabilities or medical conditions and to safeguard these children. At St James's, we recognise the additional vulnerability and so, in addition to our physical intervention policy, we aim to identify those children most at risk and offer positive, pro-active behaviour support. We do this by the use of individual behaviour plans which detail positive strategies to be used with the child with the aim of reducing the occurrence of challenging behaviour. These plans are drawn up with staff, children and parents/carers and reviewed regularly.

21. Induction

All staff members will undergo safeguarding and child protection training at induction. The training will be regularly updated and in line with advice from the local authority and the requirements of Keeping Children Safe in Education 2024.

Upon appointment and starting a new post new staff, students, volunteers and long term supply (short term supply will be given separate advice) will be issued with an induction pack, Safeguarding/Child Protection policy, Keeping Children Safe in Education -Part 1 or annex A, code of conduct, behaviour policy and other relevant safeguarding information . They will sign to say that they have received it, read and understood it. A meeting will be arranged on appointment to clarify and check understanding and to respond to any questions.

22. Training

Designated Safeguarding Lead and safeguarding team

Our designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

Our designated safeguarding lead and deputy will undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

Staff Training

All staff members will receive regular safeguarding and child protection training and updates to provide them with relevant skills and knowledge to safeguard children effectively. This will consist of annual level 1 training and updates each term via emails, staff meetings and bulletins. All staff should be aware of the Early Help process and their role in it.

As a minimum level 1 training for all staff, including Early Years includes

- What is meant by the term safeguarding.
- The main categories of abuse, harm and neglect.
- The factors, situation and actions that could lead or contribute to abuse, harm or neglect.
- How to work in ways that safeguard children from abuse, harm and neglect.
- How to identify signs of possible abuse, harm and neglect at the earliest opportunity. These may include:
 - Significant changes in children's behaviour.
 - A decline in children's general well-being.
 - Unexplained bruising, marks or signs of possible abuse or neglect.
 - Concerning comments or behaviour from children.
- Inappropriate behaviour from practitioners, or any other person working with the children. This could include inappropriate sexual comments; excessive one-to-one attention beyond what is required through their role; or inappropriate sharing of images.
 - Any reasons to suspect neglect or abuse outside the setting, for example in the child's home or that a child may experience emotional abuse or physical abuse because of witnessing domestic abuse or coercive control or that a girl may have been subjected to (or is at risk of) female genital mutilation.
- How to respond, record and effectively refer concerns or allegations related to safeguarding in a timely and appropriate way.
- The setting's safeguarding policy and procedures.
- Legislation, national policies, codes of conduct and professional practice in relation to safeguarding.
- Roles and responsibilities of practitioners and other relevant professionals involved in safeguarding.

All staff have access to our St James's Safeguarding CPD and where specific safeguarding arises individual training is provided.

Governor Training

All governors should receive appropriate safeguarding and child protection (including online) training at induction.

Safer Recruitment Training

Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

23. Safer working practices including the use of reasonable force

Our school has a code of conduct and all staff and volunteers are issued with this at induction.

All staff should seek to keep personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions should be taken when working alone with children:

- work in a room where there is a glass panel in the door or leave the door open;
- make sure that other adults visit the room occasionally;
- avoid working in isolation with children unless thought has been given to safeguards;
- do not give out personal mobile phone numbers or private e-mail addresses;
- do not give pupils lifts home in own cars;
- do not arrange to meet them outside of school hours; and
- do not chat to pupils on social websites.

Under the Sexual offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Physical Intervention/ The use of reasonable force

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The adoption of a 'no contact' policy at a school can leave staff unable to fully support and protect their pupils and so at St James's we have a physical intervention policy, which is shared with staff and available on our shared area. We also use individual behaviour plans for vulnerable pupils which we have identified as being at risk. These plans are discussed with parents/carers and provide positive behaviour strategies to try and reduce the occurrence of physical intervention being necessary.

Any use of physical force or restraint of pupils will be carried out and documented in accordance with the physical intervention policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed.

24. Safer recruitment

In order to create a safe environment for our children our school will adopt the safer recruitment procedures that help deter, reject or identify people who might abuse children, outlined in part 3 of Keeping Children Safe in Education 2023.

Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

Our school adheres to statutory responsibilities to check staff who work with children, making decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Our school informs short listed candidates that online searches may be done as part of due diligence checks.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad will be conditional on satisfactory completion of the necessary pre-employment checks and satisfactory references. Upon appointment of new staff our school will:

- verify a candidate's identity;
- obtain (via the applicant) an enhanced DBS certificate with barred list information, for all those who will be engaging in regulated activity);
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website;

- if the person has lived or worked outside the UK, make any further checks the school consider appropriate;
- verify professional qualifications, as appropriate;
- consider carrying out an online search as part of due diligence on shortlisted candidates

Our school understands that it is a criminal offence to allow any individual who is barred to carry out any form of regulated activity. Our school will comply with the legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Our school makes decisions about the suitability of any prospective employees based on checks and evidence including;

- An enhanced DBS check including barred list information.

Consideration is given to the regulated activity prospective employees will be engaged in.

a) teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on physical, emotional or education well-being, or driving a vehicle only for children.

b) work for a limited range of establishments with the opportunity for contact with children, but not including work done by supervised volunteers.

- work under a) or b) is regulated activity only if done regularly.

Some activities are always regulated activities regardless of frequency or whether they are supervised or not. This includes:

- relevant intimate or personal care which includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.
- any overnight activity.

For all other staff who have opportunity for regular contact with children who are not engaging in regulated activity, the school requires an enhanced DBS certificate, which does not include a barred list check.

For anyone appointed to carry out teaching work, an additional check will be undertaken to ensure they are not prohibited from teaching.

Any individual who has lived or worked outside the UK will be subject to the same checks as other staff and in addition school must make any further checks deemed appropriate so that any relevant events occurring outside of the UK can be considered.

School will ensure that appropriate checks are carried out to confirm that individuals employed to work in Reception classes or in wraparound care for children up to the Age of 8 are not disqualified from working in these settings under the 2018 childcare disqualification regulations.

Our school keeps a Single Central Record that complies with all the requirements. It is monitored by the Headteacher and/or Chair of Governors at regular intervals. The Single Central Record covers all staff (including supply staff, and teacher trainees on salaried routes) who work at the school, volunteers, governors, agency and third-party staff.

The following information will be recorded on the Single Central Record:

- An identity check; a barred list check; an enhanced DBS check/certificate; a prohibition from teaching check; further checks on people who have lived or worked outside the UK; a check of professional qualifications; a check to establish the person's right to work in the United Kingdom.

Our school will obtain written confirmation that the employment business supplying staff has carried out the relevant checks and obtained the appropriate certificates

All applicants MUST show their current original DBS certificate to the school as soon as they take up post.

See appendix D for procedure

References

Our school will obtain a reference for any member of staff (including students and volunteers) before they are recruited. Our school will:

- Not accept open references e.g. to whom it may concern.
- Not rely on applicants to obtain their reference.
- Ensure any references are from the applicant's current employer, training provider or education setting and have been completed by a senior person with appropriate authority.

Not accept references from a family member.

- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed.
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children). If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting.
- Ensure electronic references originate from a legitimate source.
- Contact referees to clarify content where information is vague or insufficient information is provided.
- Compare the information on the application form with that in the reference and take up any discrepancies with the applicant.
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed.

References should be provided for previous employees upon request in a timely manner. When asked to provide references, our school will ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold²³. They should not include information about concerns/allegations which are unsubstantiated, unfounded, false, or malicious.

25. Management of Allegations

At St James's, we recognise the possibility that adults working in the school may harm children. Any concerns about the conduct of any staff or adults (including supply staff and volunteers) in

the school should be taken to the headteacher without delay any concerns about the headteacher should go the Chair of Governors who can be contact via the school office.

All allegations of abuse of children carried out by any adult in school will be taken seriously. If an allegation, that may meet the harms test, is made regarding a member of staff, supply staff or volunteer, the following will be considered:

Has the adult:

- behaved in a way that has harmed a child, or may have harmed a child?
- possibly committed a criminal offence against or related to a child?
- behaved towards a child or children in a way that indicates he or she would 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?

If an allegation is made against a member of staff or adult in school, the headteacher must be informed immediately or as soon as possible within 1 working day. The school will then follow the guidelines set out in the local authority's 'Management of Allegations' document and Keeping Children Safe in Education 2024. The headteacher must contact the Local Authority Designated Officer immediately to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

If an allegation is made against the headteacher or principal, the chair of governors must contact the Local Authority Designated Officer immediately or as soon as possible within 1 working day to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

Our procedures and approach to dealing with allegations will be applied with sensitivity and common sense. Our school will exercise its duty of care to employees, we will act appropriately to manage and minimise the stress inherent in the allegation process. Our school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

At St James's we understand that there is a legal requirement for employers to make a referral to the DBS where we think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up and a referral to the DBS *must* be made, if the criteria are met.

We understand that in some cases, concerns will not meet the threshold. These will be known as low level concerns and the governing body ensures that procedures are followed. The Headteacher will make decisions regarding low level concerns, though they may wish to collaborate with the DSL on this. These concerns may still be significant as they possibly indicate that an adult may have acted in a way that is inconsistent with our staff code of conduct including inappropriate conduct outside of work. Any concerns will be dealt with appropriately and recorded by DSL including a rationale for the decisions and actions taken. See appendix D for additional information

Where the school premises are used by service providers such as, community groups or sports associations the school safeguarding policies and procedures should be followed – including informing the LADO of any allegations.

26. Whistleblowing

All staff, volunteers and parents at St James's C. E Primary should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and such concerns will be taken seriously by our headteacher, governing body and senior leadership team. This includes

safeguarding concerns including service providers for example community groups or sports associations. Our school has adopted the local authority Whistleblowing policy and appropriate whistleblowing procedures, which are suitably reflected in staff training and staff code of conduct policies are in place for such concerns to be raised with our headteacher, governing body or senior leadership team.

Where a staff member feels unable to raise an issue with our headteacher, governing body or senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, for example:

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0808 800 5000 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk. Staff can talk in confidence to Mohammed Farooq, Monitoring Officer on 01384 815301 or via emailing at mohammed.farooq@dudley.gov.uk. Alternatively, staff may take their concern externally to Protect on 02031 172520 or at www.protect-advice.org.uk

Staff can raise their concerns by contacting the dedicated Whistleblowing hotline on 01384 814242 and by email: hotline@dudley.gov.uk

If the employee has good reason to believe that:

- a) the complaint or whistleblowing will not be managed properly within the school, or
 - b) that they will be exposed to victimisation as a result of the complaint; or
 - c) the concern is about another school or another service provided by Dudley Council;
- then the employee may make the complaint directly to Dudley Council. People who make a complaint to Dudley Council about the school in which they work should set out why they feel unable to make the complaint directly to the school. As St James's CE Primary School is a voluntary aided school, staff may contact representatives from the Diocese of Worcester Safeguarding Team (Hilary Highton – 07495060869 / Delia Stokes – 07376374380 / Claire Arden – 07375078677).

Please see Whistleblowing Policy for more details.

Employees who have major concerns about other schools or about Council services outside the school where they work; should report those concerns directly to the Council under Dudley Council's Whistle Blowing policy, as a member of the public.

27. Curriculum

Schools play a crucial role in preventative education and our policies and systems that underpin this. At St James's, pupils are taught about safeguarding as part of a broad and balanced curriculum through lessons including PSHE (Jigsaw scheme), Computing and Online-Safety, Relationships Education and British values. We also have assemblies and workshops throughout the year.

We use a variety of resources and approaches to teach the children how to keep themselves safe, build their resilience, recognise when they are at risk and how to get help when they need it.

The Jigsaw curriculum includes an emphasis on relationships (relationships and sex education), building confidence and resilience in pupils and in developing preventative strategies to ensure their own protection and that of others. Opportunities are provided for pupils to develop the skills and strategies they need to stay safe from abuse, including age appropriate discussions about healthy relationships, their bodies and being able to say no to requests that they do not want to carry out. Clear advice and guidance is built into the curriculum to ensure that pupils understand

that there is a range of contacts they can turn to for advice and support and that they know where and how to report abuse.

Our school also teaches the children how to keep themselves safe through;

- Cycling Proficiency
- Swimming lessons
- Educational Visits
- PCSO – Talks on Bullying, Cyber-bullying, Stranger Danger, Firework and Park Safety
- People Who Help Us Topics
- PSHE/ Assemblies
- British Values/ Virtues and Values
- NSPCC assembly/ workshops
- Forest School activities

Through the school's curriculum the children have the opportunity to go on school trips and residential visits to enhance their learning. All off site visits are recorded. Permission slips and medical forms are collected and kept with the visit leader. Risk assessments are completed and filed within the 'Visits Folders.' We follow LEA guidance when arranging offsite/out of hours visits.

See Appendix E for a copy of the curriculum

28. Online-Safety including curriculum and computing, use of mobile technology, remote learning

The Online-Safety lead is Sarah Mason, supported by Natalie Sefton.

The growth of different electronic media in everyday life and an ever-developing variety of devices including PC's, laptops, mobile phones, webcams etc. place an additional risk on our children. Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view of grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

This use of technology has become a significant component of many safeguarding issues including, amongst others, child sexual exploitation, radicalisation and sexual predation. It is essential that children are safeguarded from potentially harmful and inappropriate online material **including misinformation, disinformation (including fake news) and conspiracy theories.**

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with pupils at this school.

Pupils can engage in or be a target of Cyber-bullying using a range of methods including text, sexting and instant messaging to reach their target. Mobile phones are also used to capture violent assaults or other children for circulation (happy slapping).

In school, we have an online safety policy, as well as a pupil agreement which require a signature regarding safe usage of ICT. This covers the four areas of risk which are content, contact, conduct and commerce.

Effective approaches to online safety will help us to protect our children whilst educating the whole school in their use of technology and establishing mechanisms to identify, intervene in and escalate concerns where appropriate.

Parents are invited to attend an annual online safety parent sessions. These communications reinforce the importance of online safety.

In school we will make pupils aware of the dangers through curriculum teaching particularly computing and IT lessons, PSHE and SRE.

At St James's C of E Primary:

- The governing body and staff do all that is reasonably possible to limit risks from the schools IT systems;
- Software (filters, firewalls and monitoring) are in place to minimise access and to highlight any person or child accessing inappropriate sites or information;
- Pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable (if this results in child protection concerns the school's DSL will be informed immediately);
- Pupils are taught not give out personal details, phone numbers, schools, home address, computer passwords etc; and
- Pupils should adhere to the school policy on mobile phones.
- Pupils will be encouraged to recognise positive, healthy and respectful online relationships.
- Pupils will be taught how to identify online risks and how/when to seek support.
- Staff should be mindful when teaching online safety that there may be a child present who is/has been affected. This may lead to a disclosure from the child regarding an online incident. Where this happens, staff will need to follow our guidelines for referrals.
- Where a child reports they have seen inappropriate online content, staff must never ask to see such content but should immediately isolate the device

The police will be involved and advice will be sought from CEOP if required if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

Remote learning

Where children are being asked to learn online at home, parents and children will be given advice on how to do so safely following guidance from 'safeguarding-in-schools-colleges-and-other-providers' and 'safeguarding-and-remote-education'.

Use of mobile phones, cameras and other devices

Unauthorised or secret use of a mobile phone or other electronic device, to record voice, pictures or video is forbidden. Unauthorised publishing of such materials on a website which causes distress to the person(s) concerned will be considered a breach of school discipline, whether intentional or unintentional. The person responsible for the material will be expected to remove this immediately upon request and appropriate procedures will be followed. Where any crime may have been committed the police will be informed.

We recognise that many aspects of the curriculum can be enhanced by the use of multi-media and that there are now a wide and growing range of devices on which this can be accomplished. Digital images, video and sound recording are only taken with the permission of participants; images and video are of appropriate activities and are only taken of children wearing appropriate dress. Full names of participants are not used either within the resource itself, within the file-name or in accompanying text online.

All parents and visitors are asked not to use mobile phones when visiting our school and to take any calls or texts outside of the building. At the start of assemblies/productions where parents and

visitors are in attendance and may wish to take photos of their children, a reminder is made informing them that they must only take photographs of their own children and that these must not be distributed on social media. All staff must be vigilant in enforcing this and remind any parents /visitors who forget. In the event of anyone breaking this rule, they are asked to delete any images before leaving the premises.

We ask all parents/carers to sign an agreement about taking and publishing photographs and video of their children and this list is checked whenever an activity is being photographed or filmed.

For their own protection staff never use a personal device (mobile phone, digital camera or digital video recorder) to take photographs of pupils, **this includes the use of smart watches that can take photographs.**

School mobile phones or similar devices with communications facilities used for curriculum activities are set up appropriately for the activity. Pupils are taught to use them responsibly.

Year 6 pupils are allowed to bring their own mobile devices into school but these must be handed into the class teacher at the start of the day. They will then be locked away securely and given back to the pupil at the end of the day. Pupils are not allowed to use their mobile devices in school.

29. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

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

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

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

It is not essential to keep copies of DBS certificates providing they have been seen and recorded on the Single Central Record.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

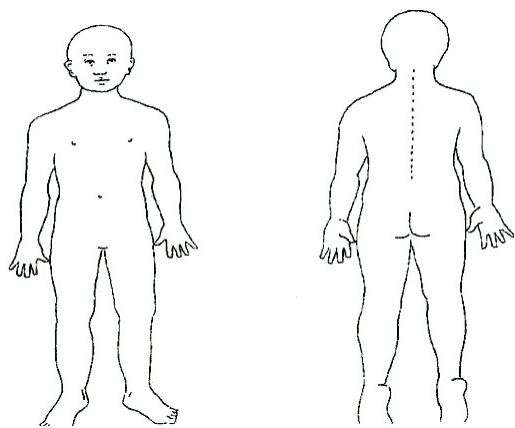
30. Monitoring policy and practice

Our Safeguarding policy and procedures will be reviewed annually or sooner if required. All staff and stakeholders may contribute to the development of our policies and procedures.

Our policy will be published on our website and paper copies are available upon request.

Appendix A – Safeguarding concerns form

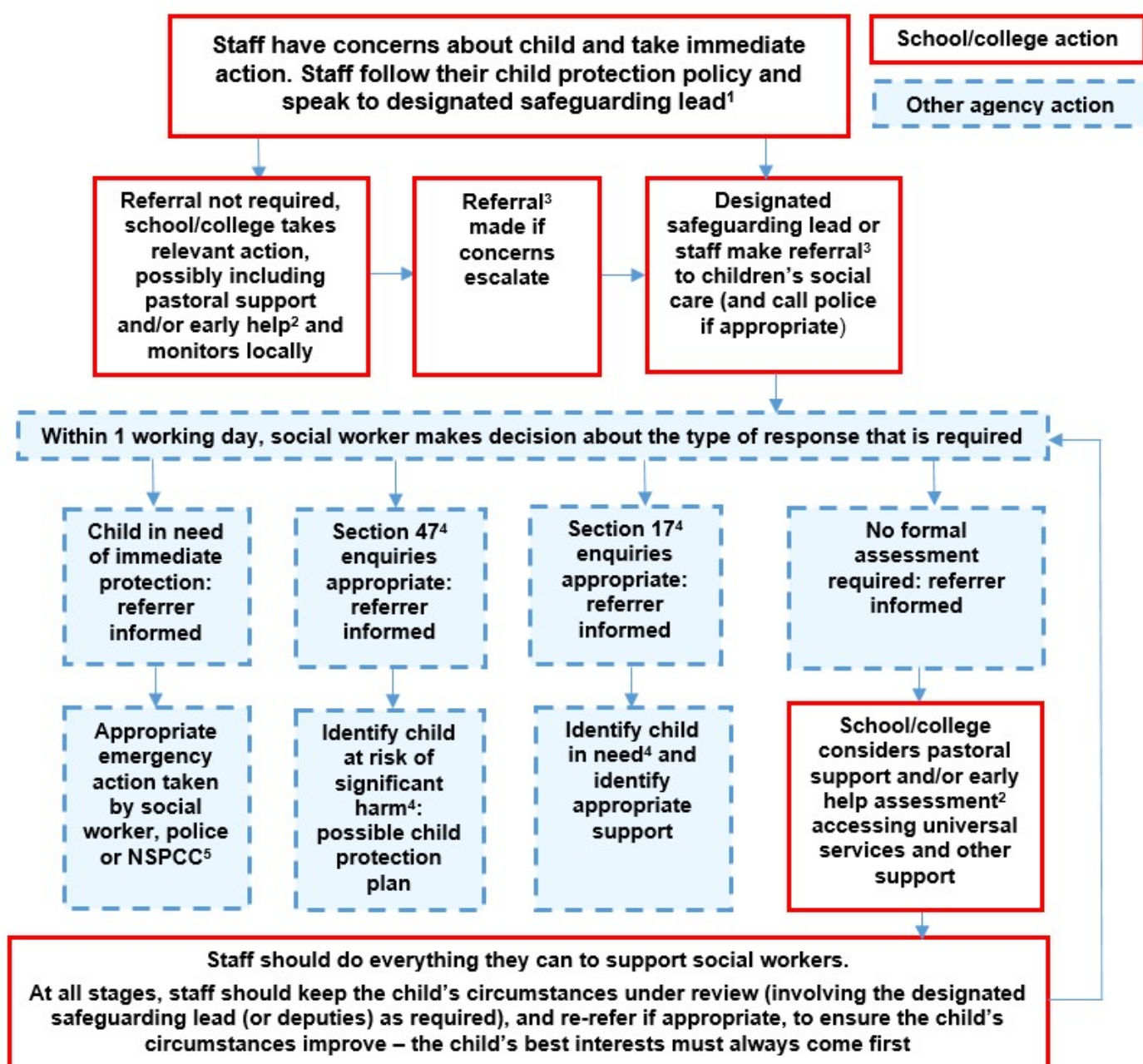
Full name of child:		Class:
Name of person reporting concern:	Position:	
Date and time of incident/ disclosure/ concern:	Date and time of reporting incident/ disclosure/ concern:	
	Reported to:	
Details of incident/ disclosure/ concern, including times, dates, description of injuries (body map attached?) and where applicable, exact words spoken by the child.		
Signed:		
Further action taken by DSL:		
Signed:		
Next steps:		



Appendix B

Actions where there are concerns about a child

1



Appendix C

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children
- › That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- › Consider any inconsistencies and look for gaps in employment and reasons given for them
- › Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list

- Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- › Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- › Not accept open references
- › Liaise directly with referees and verify any information contained within references with the referees
- › Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- › Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- › Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- › Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- › Explore any potential areas of concern to determine the candidate's suitability to work with children
- › Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when

the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- › Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Ensure they are not subject to a prohibition order if they are employed to be a teacher
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Regulated activity means a person who will be:

- › Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- › Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- › Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- › There are concerns about an existing member of staff's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- › We believe the individual has engaged in [relevant conduct](#); or
- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- › We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check

that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

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

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- › Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- › Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- › Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- › Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. In addition school will check daily that the pupil is in attendance and will act accordingly if not.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- › Behaved in a way that has harmed a child, or may have harmed a child, and/or
- › Possibly committed a criminal offence against or related to a child, and/or
- › Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

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

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

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

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

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- › Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- › Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- › Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- › Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- › Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- › **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- › **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- › Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- › Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where

this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- › Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Early years providers:

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

All schools continue with:

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

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

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- › We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- › The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- › We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- › We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavor to comply with the following timescales, where reasonably practicable:

- › Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- › If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- › If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavor to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- › Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- › Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- › Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- › Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

- How to manage press interest if, and when, it arises

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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

References

When providing employer references, we will:

- › Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- › Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- › Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff
- › Disclosure made by a child, parent or other adult within or outside the school
- › Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- › Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- › Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- › Being overly friendly with children
- › Having favourites
- › Taking photographs of children on their mobile phone
- › Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- › Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- › Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- › Empowering staff to share any low-level concerns as per section 7.7 of this policy
- › Empowering staff to self-refer
- › Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- › Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- › Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- › Directly to the person who raised the concern, unless it has been raised anonymously
- › To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

[Developing and implementing a low-level concerns policy: A guide for organisations which work with children\]](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- › Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- › Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- › Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- › The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- › The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix D

