CHURCHAM PRIMARY SCHOOL

Safeguarding & Child Protection Policy

Statutory

(Updated each September in line with the latest Keeping Children Safe in Education (KCSIE) document)

Approved by:	Full Governing Body	**Date:** September 2026
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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding leads (DSL)	Miss Esther Deackes (Teacher)	edeackes@churcham.gloucs.sch.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Deputy DSLs	Mr Mark Davies (Headteacher) Mrs Rebecca Dodd (Teacher) Miss R Daniels (SENCO)	head@churcham.gloucs.sch.uk rdodd@churcham.gloucs.sch.uk rdaniels@churcham.gloucs.sch.uk
Local Authority Designated Officer (LADO)	Gloucestershire LADO Front Door Service	01452 426994
Allegations Management Team	Gloucestershire County Council	amadmin@gloucestershire.gov.uk
LADO Advice Form	Gloucestershire County Council	https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/lado-allegations/
Chair of governors Governor responsible for Safeguarding	Mr John Ingham Mr John Cutter	chair@churcham.gloucs.sch.uk jcutter@churcham.gloucs.sch.uk
Channel helpline		020 7340 7264

1) Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2) Legislation and Statutory Guidance

Legal Framework

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

Legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The School Premises (England) Regulations 2012
- Education (Independent School Standards) Regulations 2014
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Children's Wellbeing and Schools Act 2026

Statutory Guidance

- DfE (2026) Keeping Children Safe in Education 2026
- DfE (2026) Working Together to Safeguard Children
- DfE (2024) The Prevent Duty Guidance: England and Wales
- DfE (2018) Disqualification under the Childcare Act 2006
- DfE (2026) Relationships Education, Relationships and Sex Education (RSE) and Health Education
- HM Government (2020) Multi-agency Statutory Guidance on Female Genital Mutilation
- HM Government (2021) Channel Duty Guidance: Protecting People Vulnerable to Being Drawn into Terrorism
- Home Office and Foreign, Commonwealth and Development Office (2023) Multi-agency Statutory Guidance for Dealing with Forced Marriage and Multi-agency Practice Guidelines: Handling Cases of Forced Marriage
- Early Years Foundation Stage Statutory Framework (where applicable to nursery and reception-aged children)
- Terrorism (Protection of Premises) Act 2025 (Martyn's Law)

Non-Statutory Guidance

- DfE (2015) What to do if you're worried a child is being abused
- DfE (2017) Child Sexual Exploitation: Definition and Guide for Practitioners
- DfE (2018) Information Sharing: Advice for Practitioners Providing Safeguarding Services
- DfE (2020) Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People
- DfE (2021) Teachers' Standards
- DfE (2022) Recruit Teachers from Overseas
- DfE (2026) Working Together to Improve School Attendance
- DfE (2026) Meeting Digital and Technology Standards in Schools and Colleges
- DfE (2026) Filtering and Monitoring Standards for Schools and Colleges
- DfE (2026) Teaching Online Safety in Schools
- DfE (2026) Mobile Phones in Schools
- DfE (2026) Generative Artificial Intelligence (AI) in Education
- Department of Health and Social Care (2022) Virginity Testing and Hymenoplasty: Multi-agency Guidance
- Information Commissioner's Office (ICO) Guide to Sharing Information to Safeguard Children and Young People in the Education Sector

3) Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

The sharing of nude and semi-nude images and/or videos by children is the terminology used within Keeping Children Safe in Education 2026. Staff should avoid using the term "sexting" and instead use the language "sharing nudes and semi-nudes".

Children includes everyone under the age of 18.

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

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

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

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

4) Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5) Roles and responsibilities

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff are expected to read at least part 1 of Keeping Children Safe in Education 2026 (KCSIE).

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues)

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- Staff are aware that if they are dissatisfied with the response to a safeguarding referral, or believe a child's circumstances are not improving, they have a responsibility to pursue matters further using the GSCP Escalation Policy and professional challenge processes.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

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

During term time and outside of term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns: edeackes@Churcham.gloucs.sch.uk

When the DSL is absent, the deputies, Mr Mark Davies (Headteacher), Mrs Rebecca Dodd (Class Teacher) and Miss Richelle Daniels (SENDCo) will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
    - Ensure that the school has appropriate arrangements in place to prepare for and respond to terrorist incidents, including evacuation, invacuation, lockdown and emergency communication procedures, in line with the requirements and implementation timetable of the Terrorism (Protection of Premises) Act 2025 (Martyn's Law).
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure

- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

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

All governors will read Keeping Children Safe in Education (2026) in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting
- Ensuring that safer recruitment procedures are followed in line with KCSIE, including appropriate vetting checks, maintaining the single central record, and ensuring all recruitment and appointment processes reflect the school's commitment to safeguarding.

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6) Confidentiality (see data protection policy)

- Timely and proportionate information sharing is essential to effective safeguarding. Staff must share information as soon as it is needed to protect a child.
- Fears about sharing information must never stand in the way of promoting the welfare and safety of children. Staff should be confident that they can share information to keep children safe.
- The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for safeguarding purposes. Where there is a safeguarding concern, staff should share information with the DSL (or deputy) without delay.

- When staff need to share special category personal data, the DPA 2018 includes *'safeguarding of children and individuals at risk'* as a lawful condition for processing. This allows practitioners to share information without consent when:
    - It is not possible to gain consent
    - It cannot reasonably be expected that consent is gained
    - Seeking consent would place a child at risk
- Staff must never promise confidentiality to a child who reports abuse. They must explain that information will be shared with people who can help keep them safe.

If a victim asks the school not to share information about sexual violence or sexual harassment:

- There is no automatic rule. Even without consent, staff may lawfully share information if another UK GDPR basis applies.
- The DSL must balance the victim's wishes with their duty to protect the victim and other children.
- The DSL will consider that:
    - Parents/carers will normally be informed unless doing so places the victim at greater risk
    - The basic safeguarding principle applies: if a child is at risk of harm, in immediate danger, or has been harmed, a referral must be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Any report of these must be referred to the police.
        - Even if the alleged perpetrator is under 10, the starting principle of referral remains.

Anonymity

All staff will:

- Understand anonymity, witness support and the criminal process where a report of sexual violence or sexual harassment is progressing through the criminal justice system
- Take all reasonable steps to protect the anonymity of children involved, including limiting who is informed and managing support discreetly
- Consider the risks posed by social media in spreading rumours or identifying victims

Information-sharing guidance

- Staff will follow the government's 7 Golden Rules for Information Sharing, which support decision-making when sharing information.
- If staff are ever in doubt, they must speak to the DSL (or deputy) immediately.

Cross-references

- Confidentiality relating to record-keeping is set out in section 14.
- Confidentiality relating to allegations against staff is set out in appendix 3.

7) Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below whenever a safeguarding concern arises. Throughout this section, references to the DSL include the deputy DSL.

7.1 If a child is suffering, likely to suffer harm, or in immediate danger

If you believe a child is suffering, likely to suffer significant harm, or is in immediate danger, you must:

- Make a referral to children's social care and/or the police immediately.
- Anyone can make a referral; do not wait for the DSL if delay would increase risk.
- Inform the DSL as soon as possible if you make a referral directly.

Referral link: https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding concern:

- Listen carefully and believe them. Allow them time to talk freely.
- Do not ask leading questions or press for more detail.
- Stay calm and do not show shock or upset.
- Reassure the child that telling you was the right thing to do.
- Do not promise confidentiality. Explain that you must share the information with people who can help keep them safe.
- Record the disclosure immediately, using the child's own words, sticking to facts. Upload to CPOMS.
- Inform the DSL immediately.
- If appropriate, you may make a direct referral to children's social care or the police (see 7.1), but you must tell the DSL as soon as possible.

Do not share the information with anyone else unless directed by the DSL, children's social care, or the police.

Children may not disclose directly

Staff must remember that some children may:

- Not feel ready or know how to tell someone
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened
- Face additional barriers due to disability, vulnerability, sexual orientation, gender identity, or language barriers

These factors must never prevent staff from maintaining professional curiosity and speaking to the DSL if they have concerns.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

FGM is illegal and constitutes child abuse. It involves "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs" (KCSIE 2026).

Indicators of FGM or risk factors are listed in **Appendix 4**.

Mandatory reporting duty (teachers only)

Any **teacher** who:

- Is informed by a girl under 18 that FGM has been carried out on her; **or**
- Observes physical signs that appear to show FGM has been carried out on a girl under 18, and there is no reason to believe it was medically necessary

Must report this to the police personally and immediately. Failure to do so is a disciplinary offence.

Unless specifically instructed not to disclose, teachers should also inform the DSL and involve children's social care as appropriate.

Other staff

Any other member of staff who suspects or discovers that FGM appears to have been carried out must:

- Inform the DSL immediately
- Follow local safeguarding procedures

If a pupil is at risk of FGM

The mandatory reporting duty does not apply where FGM is suspected but not confirmed. Staff must:

- Not examine pupils
- Report concerns to the DSL
- Follow local safeguarding procedures

7.4 If you have concerns about a child (not immediate danger)

If you have concerns about a child's welfare, follow the process illustrated in **Figure 1** (before section 7.7).

Where possible:

- Speak to the **DSL first** to agree a course of action.

If the DSL is unavailable:

- Speak to a member of the senior leadership team
- Contact children's social care for advice
- You may also contact the NSPCC helpline: 0808 800 5000

Share details of any actions taken with the DSL as soon as possible.

Referral

If a referral to children's social care or the police is appropriate:

- The DSL will make the referral or support you to do so.
- If you make a referral directly, you must inform the DSL as soon as possible.

Children's social care will decide within **1 working day** what action to take and inform the referrer. The DSL (or referrer) must follow up if this information is not provided and ensure outcomes are recorded.

Where there is professional disagreement regarding thresholds, decision-making or outcomes, staff and DSLs will follow the Gloucestershire Safeguarding Children Partnership (GSCP) Escalation Policy. Professional challenge is recognised as an important safeguarding responsibility and concerns should be escalated where outcomes are unclear or where there is ongoing concern regarding a child's welfare.

GSCP Escalation Policy:

https://trixcms.trixonline.co.uk/api/assets/gloucestershirescp/7f658135-cbc1-433b-a1c7-b48501efc0b5/escalation-protocol-v1.10.1-feb-2026.pdf

Local referral link: https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/report-a-child-at-risk/

7.5 Early Help

Early help may be appropriate where a child's needs do not meet the threshold for statutory intervention but require coordinated support.

The DSL will:

- Lead on liaising with other agencies
- Set up inter-agency early help assessments
- Keep cases under review
- Consider referral to children's social care if concerns escalate or do not improve

Staff may be required to support early help processes or act as lead practitioner.

Local early help guidance: https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/early-help-and-targeted-support/early-help-advice-guidance-and-support/

Additional early help indicators (KCSIE 2026)

Schools must be alert to children who:

- Have experienced multiple suspensions
- Are at risk of permanent exclusion
- Attend alternative provision or PRUs
- Have a parent/carer in custody or affected by parental offending
- Are frequently missing from education, home or care

7.6 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

7.7 If you have a concern about mental health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

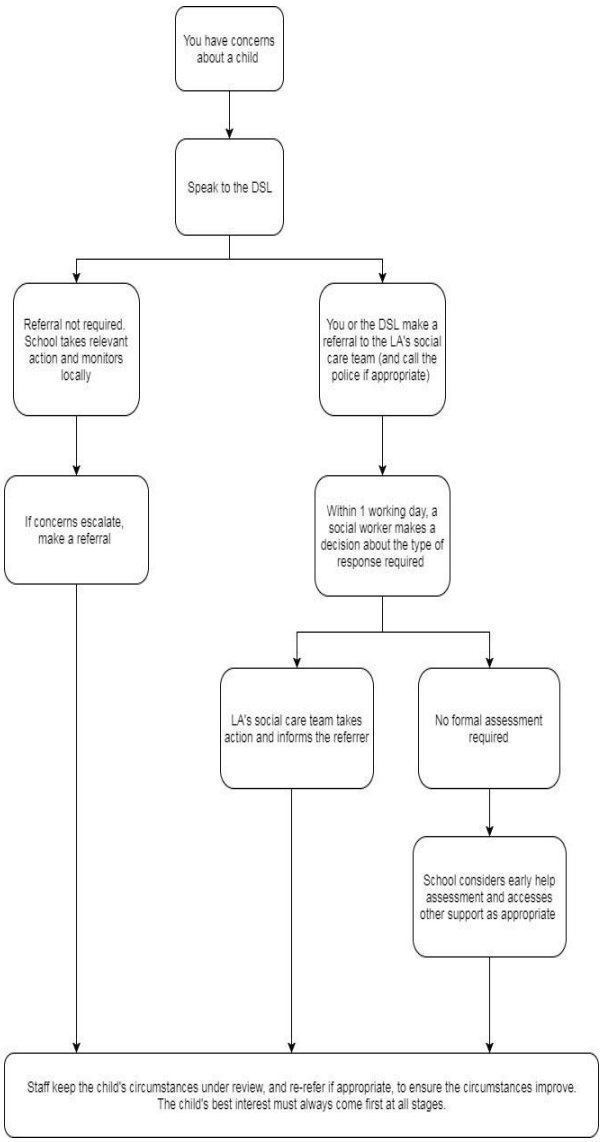
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)


You have concerns about a child
Speak to the DSL
Referral not required. School takes relevant action and monitors locally
You or the DSL make a referral to the LA's social care team (and call the police if appropriate)
If concerns escalate, make a referral
Within 1 working day, a social worker makes a decision about the type of response required
LA's social care team takes action and informs the referrer
No formal assessment required
School considers early help assessment and accesses other support as appropriate
Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

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

If you have a concern or an allegation about a member of staff (including supply teachers, volunteers or contractors) that indicates they may pose a risk of harm to children, you must report it to the headteacher immediately.

If the concern/allegation relates to the headteacher, report it to the chair of governors without delay.

The headteacher or chair of governors will follow the procedures set out in Appendix 3, including managing:

- Allegations that meet the harm threshold
- Low-level concerns
- Concerns relating to behaviour that may indicate unsuitability to work with children

Where you believe there is a conflict of interest in reporting a concern or allegation to the headteacher, you must report it directly to the Local Authority Designated Officer (LADO).

If an allegation relates to an incident involving an individual or organisation using the school premises to run activities for children, you must follow the school's safeguarding procedures and inform the LADO, as you would for any safeguarding allegation.

Where required, the school will notify Ofsted of the allegation and subsequent actions within the statutory timescale (see Appendix 3).

7.9 Allegations of abuse made against other pupils

The school recognises that children can abuse other children. Child-on-child abuse is never acceptable, never tolerated, and never dismissed as "banter", "just having a laugh", or "part of growing up". Such attitudes create unsafe environments and undermine safeguarding.

We recognise that child-on-child abuse can be gendered, but all forms of abuse—regardless of gender—are taken seriously.

Most incidents will be managed under the Behaviour Policy, but this safeguarding policy applies when the behaviour:

- Is serious or potentially a criminal offence
- Could place pupils at risk
- Is violent
- Involves coercion, control or exploitation
- Involves drugs or alcohol
- Involves sexual violence, sexual harassment, or harmful sexual behaviour
- Involves sharing nudes or semi-nudes, upskirting, indecent exposure, or sexually inappropriate images/videos

See **Appendix 4** for more information on child-on-child abuse.

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

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

- Record the allegation and inform the DSL immediately.
- Do not investigate the allegation yourself.
- The DSL will contact children's social care and follow their advice.
- If the allegation may involve a criminal offence, the DSL will also contact the police.
- The DSL will implement a risk assessment and support plan for all children involved (victim(s), alleged perpetrator(s), and any other affected pupils).
    - This will include consideration of school transport, which may be a vulnerable environment.
- The DSL will contact CAMHS or other specialist services where appropriate.

If the incident is a criminal offence and the police investigation is ongoing, the DSL will work closely with the police and other agencies while ensuring children are protected and disciplinary measures are considered. The school will ask the police for clarification where needed.

Creating a supportive environment and minimising the risk of child-on-child abuse

We take proactive steps to reduce the risk of child-on-child abuse and create a culture where pupils feel confident reporting concerns.

The school will:

- Challenge all derogatory, sexualised or inappropriate language and behaviour.
- Be vigilant to gender-specific risks (e.g., sexualised touching of girls; hazing or initiation violence among boys).
- Ensure the curriculum teaches pupils about respectful relationships, consent, boundaries, and online safety.
- Ensure pupils can report concerns easily and confidently (see section 7.10).

- Reassure victims that they are being taken seriously and will be supported.
- Be alert to patterns of sexual violence/harassment that may indicate environmental or systemic issues requiring policy or curriculum changes.
- Support children who witness sexual violence, including rape or assault by penetration.
- Prevent bullying or harassment of victims, alleged perpetrators, or witnesses.
- Consider intra-familial harms, including support for siblings.

Staff training and expectations
All staff will be trained to understand:
- Indicators and signs of child-on-child abuse.
- That a lack of reports does not mean abuse is not happening—staff must maintain an attitude of "it could happen here".
- That concerns must be acted on immediately, even without a direct disclosure.
    - Children may show signs or act in ways that signal distress.
    - Friends may report concerns.
    - Staff may overhear conversations.
    - Behaviour changes may indicate harm.
- That some children face additional barriers to reporting due to vulnerability, disability, gender, ethnicity, or sexual orientation.
- That a pupil harming another may themselves be a victim of abuse.
- Their role in preventing child-on-child abuse and responding to concerns.
- The need to speak to the DSL whenever they have concerns.
- The role of social media in escalating incidents, facilitating contact, or spreading rumours.

Disciplinary action
The DSL will lead on disciplinary processes for alleged perpetrators. Support for all children involved will run alongside any disciplinary action.
Disciplinary action may proceed even while other investigations are ongoing, including police investigations. The school will consider:
- Whether taking action would prejudice an external investigation—this will be determined through liaison with the police and/or children's social care.
- Whether circumstances make it unreasonable or irrational to reach a school-based conclusion while an independent investigation is ongoing.

7.10 Sharing of Nudes and Semi-Nudes Images
The term *sharing of nudes and semi-nudes* refers to the consensual or non-consensual creation and/or sharing of nude or semi-nude images or videos by children and young people. This includes "youth-produced sexual imagery".
All incidents must be treated as safeguarding concerns. Staff must follow the steps below.
Your responsibilities when responding to an incident
If you become aware of an incident involving the sharing of nudes or semi-nudes:
- **Report it to the DSL immediately.**
- **Do not**:
    - View, copy, print, share, store or save the imagery
    - Ask a pupil to share, download or show you the imagery
    - Delete the imagery or ask the pupil to delete it
    - Ask pupils involved to disclose information about the imagery
    - Share information with other staff, pupils or parents/carers
    - Blame or shame any young person involved

If you have accidentally viewed the imagery, report this to the DSL immediately.
You should explain to the pupil(s) that you must report the incident and reassure them that they will be supported.

Initial review meeting
After a report, the DSL will hold an initial review meeting with appropriate staff. This may include the reporting staff member and safeguarding/leadership colleagues.
The meeting will consider:
- Whether any pupil is at immediate risk
- Whether a referral to police and/or children's social care is required
- Whether viewing the imagery is necessary to safeguard the young person (this is rare)
- What further information is needed

- Whether the imagery has been shared widely and via which platforms
- Whether immediate action is needed to remove imagery from devices or online services
- Relevant facts about the pupils involved
- Whether another school, college or setting needs to be contacted
- Whether parents/carers should be informed (in most cases they should)

Mandatory referral triggers
The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is evidence or suspicion of coercion, blackmail or grooming
- There are concerns about a pupil's capacity to consent (e.g., due to SEND)
- The imagery depicts sexual acts that are unusual for the young person's developmental stage or are violent
- The imagery involves sexual acts and any pupil depicted is under 13
- A pupil appears to be at immediate risk of harm, including suicidal ideation or self-harm linked to the incident

If none of these apply, the DSL may decide—alongside the headteacher—to manage the incident internally. This decision will be recorded.

Further review by the DSL
If the initial review concludes that police/social care referral is not required, the DSL will conduct a further review to:
- Establish the facts
- Assess risk
- Hold interviews with pupils involved (if appropriate)

If at any point the DSL believes a pupil has been harmed or is at risk of harm, a referral will be made immediately.

Informing parents/carers
Parents/carers will be informed at an early stage unless doing so would place a pupil at greater risk of harm.

Referring to the police
Where referral is required, the DSL will contact the police via **101** (or 999 if a child is in immediate danger).

Recording incidents
All incidents involving the sharing of nudes or semi-nudes will be:
- Recorded on **CPOMS**
- Documented in line with the record-keeping requirements in **Section 14**
- Logged with clear decision-making rationale

Curriculum coverage
Pupils are taught about the risks and consequences of sharing nudes and semi-nudes through RSHE and computing. Teaching includes:
- What sharing nudes/semi-nudes is
- How pupils may encounter it
- Legal implications
- When it constitutes online sexual harassment
- Emotional, social and reputational consequences
- Strategies for managing pressure, requests, or receipt of such images

Pupils are also made aware of the school's procedures so they know how incidents will be handled.

Use of Generative AI: Safeguarding Guidance
Generative AI tools (e.g., chatbots, image generators, content-creation platforms) can support learning but also pose safeguarding risks, including exposure to inappropriate content, deepfakes, misinformation, biased outputs, and data-privacy concerns.

Safeguarding Measures
- Staff may only use AI tools approved by the school leadership team.
- Pupils must not access generative AI platforms without direct supervision and a clear educational purpose.
- All AI-generated content used in teaching must be checked for accuracy, appropriateness and bias.
- Staff must remain vigilant to AI-generated misinformation, especially in pupil research or creative work.
- The school will provide training on ethical AI use and safeguarding implications.

- Any concerns about AI-related content or pupil use must be reported to the DSL immediately.

This section will be reviewed annually in line with technological developments and DfE guidance.

Online Safety: Expanded Risk Categories (Updated for 2026)
Online safety is a core safeguarding responsibility. In addition to established risks (cyberbullying, grooming, radicalisation), pupils now face emerging threats such as misinformation, disinformation, conspiracy content, and manipulative online narratives.

Safeguarding Measures

- Pupils will be taught to critically evaluate online content, including recognising bias, false information and manipulative narratives.
- Staff will receive training on identifying and responding to pupil exposure to harmful online ideologies or falsehoods.
- The curriculum will include age-appropriate digital literacy, enabling pupils to question and verify online sources.
- The school will monitor pupil use of digital platforms and respond swiftly to concerns about exposure to misleading or extremist content.
- Parents will be offered guidance on supporting safe online habits at home.

This section will be updated annually and in response to emerging risks identified by national safeguarding bodies.

7.11 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting system is well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

8 Online safety and the use of mobile technology

We recognise that safeguarding children from harmful and inappropriate online content is essential, and that technology is a significant factor in many safeguarding, wellbeing and behavioural issues. Online safety is a whole-school responsibility and forms part of our wider safeguarding culture.

To address this, our school aims to:

- Maintain robust filtering and monitoring systems that meet the DfE's Filtering and Monitoring Standards and protect pupils, staff, volunteers and governors.
- Protect and educate the whole school community in the safe and responsible use of technology, including mobile and smart devices.
- Set clear expectations for the use of mobile phones and smart technology across the school community.
- Establish clear mechanisms to identify, intervene in and escalate online safety concerns.

The 4 Key Categories of Online Risk

Our approach to online safety is based on addressing the following categories of risk:

1. Content

Being exposed to illegal, inappropriate or harmful content, including:

- Pornography

- Fake news, misinformation and disinformation
- Racism, misogyny, antisemitism
- Self-harm or suicide content
- Radicalisation and extremism

2. Contact

Being subjected to harmful online interaction, including:

- Peer-to-peer pressure
- Commercial advertising
- Adults posing as children or young people
- Grooming for sexual, criminal, financial or other exploitation

3. Conduct

Personal online behaviour that increases the likelihood of harm, including:

- Making, sending or receiving explicit images (including sharing nudes/semi-nudes)
- Online bullying
- Sharing explicit or harmful content

4. Commerce

Risks such as:

- Online gambling
- Phishing and financial scams
- Inappropriate advertising

How We Address These Risks

Education for Pupils

We teach pupils about online safety through our curriculum, including:

- Safe use of social media, the internet and digital technology
- Keeping personal information private
- Recognising unacceptable or harmful behaviour online
- Understanding online manipulation, misinformation and extremist narratives
- How to report cyberbullying or harmful content, including when they are a witness

Training for Staff

All staff receive training at induction and at least annually on:

- Safe internet use
- Online safeguarding risks, including cyberbullying and online radicalisation
- Expectations, roles and responsibilities relating to filtering and monitoring
- Identifying and responding to harmful online content, including misinformation and extremist narratives
- Supporting pupils affected by online harms

Education for Parents/Carers

We support parents/carers by:

- Providing online safety guidance via our website and direct communications
- Offering advice at parents' evenings

- Sharing clear procedures for raising online safety concerns

Mobile Phones and Smart Technology

All staff must follow restrictions on mobile phone and camera use, including:

- Staff may bring personal phones to school but must limit use to non-contact time when pupils are not present.
- Staff must not take photos or recordings of pupils on personal devices.
- Pupils, parents/carers, staff, volunteers and governors must sign our Acceptable Use Agreement covering internet use, ICT systems and mobile/smart technology.

Sanctions

We explain clearly to pupils the sanctions applied if they breach acceptable use policies relating to internet use or mobile phones.

Searching Pupils' Phones

All staff, pupils and parents/carers are made aware that staff have the power to search pupils' phones in line with DfE guidance on searching, screening and confiscation.

Filtering and Monitoring

We:

- Use robust filtering and monitoring systems to limit exposure to the four categories of risk.
- Review our filtering and monitoring approach annually.
- Complete an annual online safety risk assessment reflecting the risks faced by our school community.
- Ensure staff understand their responsibilities in relation to filtering and monitoring as part of safeguarding training.

Safeguarding Updates

We provide regular safeguarding updates—including online safety—to all staff at least annually.

Protective Security and Emergency Preparedness (Martyn's Law)

The school recognises its responsibilities under the Terrorism (Protection of Premises) Act 2025 (Martyn's Law) and will maintain appropriate arrangements to reduce the risk of harm from a terrorist incident and to ensure an effective response should an incident occur.

The school will:

- Maintain and regularly review emergency response procedures, including evacuation, invacuation, lockdown and communication arrangements.
- Ensure staff are familiar with emergency protective actions and reporting procedures.
- Consider site security, visitor management and protective security as part of the school's wider safeguarding and health and safety arrangements.
- Work with relevant agencies, including Gloucestershire County Council, emergency services and safeguarding partners where appropriate.
- Review arrangements following exercises, incidents or updated national guidance.

Protective security arrangements are detailed further within the school's Health and Safety Policy, Critical Incident Plan, Lockdown Procedure and Site Security Risk Assessment.

Policy Review

We review this child protection and safeguarding policy, including online safety, annually and update procedures regularly.

9 Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10 Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils, if appropriate, through our SENCO, Richelle Daniels.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11 Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact

arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Richelle Daniels, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13 Complaints and concerns about school safeguarding policies

13.11 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.12 Other complaint- see Complaints Policy

13.13 Whistle-blowing- see Whistle-blowing policy

14 Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded via CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept via CPOMS.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

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

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

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15 Training

15.1 All Staff

All staff will undertake safeguarding and child protection training at induction, including:

- Whistleblowing procedures
- Online safety
- The school's safeguarding systems
- Their statutory responsibilities
- How to identify signs of abuse, neglect, exploitation or emerging need
- Emergency preparedness, lockdown and protective security awareness, including the principles of Martyn's Law where applicable.

This training will be regularly updated and will:

15.11.1 Be integrated into the school's whole-school safeguarding approach, aligned with wider staff training and curriculum planning 15.11.2 Follow advice from the three safeguarding partners 15.11.3 Include online safety, with a clear understanding of staff expectations, roles and responsibilities relating to filtering and monitoring 15.11.4 Have regard to the Teachers' Standards, supporting the expectation that all teachers:

- Manage behaviour effectively to ensure a safe environment
- Understand the needs of all pupils, including those with SEND, vulnerabilities or additional barriers

All staff will receive training on the government's Prevent duty to help them identify children at risk of radicalisation and challenge extremist ideas.

Staff will also receive regular safeguarding updates, including online safety, at least annually (e.g., via briefings, emails, e-bulletins, staff meetings).

Contractors provided through PFI or similar arrangements will receive safeguarding training appropriate to their role.

Volunteers will receive appropriate safeguarding training, proportionate to their level of contact with pupils.

15.2 The DSL and Deputy DSL

The DSL and deputy DSL will undertake formal child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at least annually, for example through:

- E-bulletins
- Local DSL networks
- Reading safeguarding research and updates
- Multi-agency meetings

They will also undertake Prevent awareness training.

Their training will ensure they can:

- Lead safeguarding practice
- Understand filtering and monitoring systems
- Manage referrals
- Support staff
- Oversee early help
- Respond to sexual violence/harassment
- Maintain high-quality safeguarding records

15.3 Governors

All governors will receive safeguarding and child protection training (including online safety) at induction, with regular updates thereafter. This ensures governors:

15.3.1 Have the knowledge required to fulfil their strategic safeguarding responsibilities 15.13.2 Can assure themselves that safeguarding policies, procedures and practice are effective and support a robust whole-school approach

The chair of governors, who may act as *case manager* for allegations against the headteacher, will receive specific training on managing allegations.

Governors will also receive training on:

- Filtering and monitoring expectations
- Online safety risks
- Low-level concerns
- Safer recruitment responsibilities

15.4 Recruitment – Interview Panels

At least one member of any interview panel will have completed safer recruitment training, covering:

- The requirements of Keeping Children Safe in Education
- Local safeguarding procedures
- Identifying and addressing unsafe practice
- Ensuring recruitment processes reflect the school's safeguarding culture

See Appendix 2 for full safer recruitment procedures.

15.5 Staff Who Have Contact with Pupils and Families

All staff who work directly with children and families will receive supervision, which will:

- Provide support, coaching and training
- Promote the interests and welfare of children
- Allow confidential discussion of sensitive issues
- Strengthen professional judgement and reflective practice

Supervision will be regular, structured and aligned with the school's safeguarding culture.

16 Monitoring arrangements

This policy will be reviewed **annually** by the DSL, Miss Esther Deackes and Headteacher/DDSL – Mr Mark Davies. At every review, it will be approved by the full governing board.

17 Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use

- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse 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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

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. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

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

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 take a decision 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 on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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).

The chair of the board will have their DBS check countersigned by the secretary of state.

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

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.

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.

Allegations against staff (including low-level concerns) policy

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 out 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.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

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

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

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.

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 endeavour 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 endeavour 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.

We will retain all records at least until the accused 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 dcision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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 4: specific safeguarding issues

Children who are absent from education

The school recognises that attendance is a key safeguarding indicator. Poor attendance, persistent absence, severe absence, repeated lateness, unexplained absence and patterns of non-attendance will always be considered through a safeguarding lens.

Attendance concerns will be triangulated with other safeguarding information, including CPOMS records, family circumstances, vulnerable pupil monitoring, SEND, Early Help involvement and information received from external agencies.

Where attendance concerns suggest a child may be at risk of harm, exploitation, neglect, domestic abuse, radicalisation or other safeguarding concerns, safeguarding procedures will be followed immediately.

This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel

- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

The school will follow Gloucestershire Children Missing Education (CME) procedures where appropriate.

Where a child has:

- ten days of unexplained absence;
- leaves school without confirmation of a destination;
- fails to start at an expected educational setting;
- repeatedly goes missing from education;

the DSL and Headteacher will consider safeguarding risks and determine whether a CME referral is required.

Children missing education will always be treated as a potential safeguarding concern until the child's whereabouts, safety and educational provision are confirmed.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is 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 violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online 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 videos by children.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass –The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

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

Schools have a duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism, in accordance with the Prevent Duty Guidance 2024.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they 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 by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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 in using the schools visitor system 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)

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.