Inspire Partnership

Inspire Partnership Academy Trust

Child Protection and Safeguarding Policy 2026

Woodhill Primary School

Date of Last Review:	**July 2026**
Date agreed by Trustees:	
Name of Designated Safeguarding Lead for Child Protection:	**Sunita Vyas & Louise Mapp**
Name of Deputy Designated Safeguarding Lead for Child Protection:	**Jodie Waterton**
Name of Trustee for Safeguarding/Child Protection:	**Lucy Ellis**
Date shared with all staff:	**September 2026**
Date of next review:	**September 2027**

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Child Protection and Safeguarding Policy

The Inspire Partnership Academy Trust recognises its moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are protected, respected and valued. All our staff are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that our children receive effective and timely support.

This Child Protection and Safeguarding Policy applies to all schools within the Trust. Individual schools within the Trust have supplemented this policy with their own school level procedures and processes. The term headteacher is used in this policy for consistency, however, this title may vary depending on the school's senior leader structure.

Key contacts:

Designated Safeguarding Lead: Sunita Vyas & Louise Mapp

Deputy Designated Safeguarding Lead: Jodie Waterton, Louise Mapp, Hannah Bywater, Carissa Lichty, Sam Carroll, Julie Sillince, John Laws, Paul Fernando-Thorne & Samantha Morton.

Link Trustee for Safeguarding: Lucy Ellis

Local Authority Designated Officers (LADO)

Website:
https://www.royalgreenwich.gov.uk/children-young-people-and-families/get-help-if-child-or-young-person-may-be-risk/report-your#

Telephone: 020 8921 3930

1. Aims

The Inspire Partnership Academy Trust 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

2.1. This policy is based on the Department for Education's statutory guidance:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Academy Trusts: Governance Guide
- Statutory framework for the Early Years Foundation Stage.

The school will have regard to this statutory guidance and will follow the procedures established by its local safeguarding partners.

2.2. This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

- The Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025, which together form the data protection framework governing the lawful, proportionate and secure processing and sharing of personal information, including information shared for safeguarding purposes
- The Crime and Policing Act 2026, which amended the definition of regulated activity in relation to children, including the arrangements applying to volunteers
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Trustees and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Children's Wellbeing and Schools Act 2026, which provides a legislative framework for strengthening children's safeguarding and welfare, including improved information sharing between relevant agencies, a stronger role for education within multi-agency safeguarding arrangements, enhanced oversight of children who may be missing from education or educated outside school, and earlier, more coordinated support for vulnerable children and families.
- The Education Regulations 2026, which extend behaviour provisions and alignment obligations to Academies under UK health and safety law.

2.3. Where the school provides early years provision, this policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

2.4. This policy also complies with the Trust's funding agreement and articles of association.

2.5. Where a member of staff fails to comply with this policy, the Trust may take action under its Staff Disciplinary Policy and Procedure.

3. Definitions

3.1. 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
- Working in partnership with parents and carers, wider family networks and relevant agencies wherever this is safe and consistent with the child's best interests
- Using child-centred, anti-racist, anti-discriminatory and culturally aware practice while maintaining a clear focus on the safety and wellbeing of the child

3.2. **Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

3.3. **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.

3.4. **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.

3.5. **Making or sharing nudes and semi-nudes** refers to the creation, possession, requesting, sending, posting or distribution of nude or semi-nude images, videos or livestreams involving anyone under the age of 18. This includes consensual and non-consensual activity and content created, possessed or shared online or offline. Images may have been taken by the child, taken or created by another person, digitally altered or generated wholly or partly through artificial intelligence.

3.6. **Deepfakes and deep nudes** are images, videos or audio that have been digitally manipulated or generated using artificial intelligence to create a false but realistic representation of a person. This includes content which falsely depicts a child as nude, semi-nude or participating in sexual activity, regardless of whether an original sexual image existed.

3.7. **Children** includes everyone under the age of 18.

3.8. 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

3.9. **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.

3.10. **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

4.1. 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 child-centred, anti-racist, anti-discriminatory and culturally aware practice. We recognise children's diverse circumstances, remain alert to the effect of stereotypes and bias, and ensure that all children receive the same protection and an equitable response to their needs.

4.2. We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 13.1)
- 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 13.2)
- 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

Where a child or their parent or carer requests support relating to social transition, members of staff will not make informal or unilateral changes. The headteacher, DSL and other relevant professionals will undertake and record a case-by-case assessment. This will consider the welfare and best interests of the child and other children, any safeguarding concerns, the school's equality and human-rights duties, and any relevant clinical or non-clinical professional advice.

Parents or carers will be involved as a matter of priority and their views will be given appropriate weight. In the rare circumstances where involving parents or carers may create a greater safeguarding risk, the DSL will determine what action is necessary to

safeguard the child before contact is made or decisions are taken. All decisions will be documented, communicated on a need-to-know basis and reviewed when circumstances change.

5. Roles and responsibilities

5.1. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, Local Community Council members and trustees 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 forms part of a whole-school approach to preparing pupils for life in modern Britain and creating a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence and harassment, derogatory behaviour, and other forms of physical violence and conflict.

The school will promote an inclusive, anti-discriminatory culture in which racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities.

This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships and health education (RHE), 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 female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.2. All staff

All staff will:

- Read and understand Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Acknowledge on The National College platform at the beginning of each academic year to say that they have reviewed the guidance. This guidance will also be provided to staff when joining the school as part of their induction.

- Reinforce the importance of online safety when communicating with parents. This includes making parents 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 and be a trusted adult for pupils who are LGBT to be able to speak out and be open with.

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 deputies, 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 or are absent from education.
- The processes for universal services and community-based early help, targeted early help and Family Help assessments, including local criteria and levels of need, their own role in identifying emerging problems, liaison with the DSL and appropriate information sharing with other professionals.
- 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 abuse, neglect, exploitation and modern slavery, including child-on-child abuse and harassment, child sexual exploitation, child criminal exploitation, serious violence, county lines, female genital mutilation, radicalisation and mental health concerns that may indicate a child is at risk of harm.
- Prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Staff will recognise that such experiences may affect a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff will be alert to the signs and impact of prejudice-based harm and will ensure that concerns are considered within safeguarding practice where appropriate.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- 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 (LGBT) can be targeted by other children.
- What to look for to identify children who need help or protection.

- The need to report to the senior leadership team any personal issue that may impair, or bring into doubt, their ability to discharge their safeguarding and child protection responsibilities objectively.

Section 13 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

5.3. The Designated Safeguarding Lead (DSL)

The DSL and deputy DSLs will read and understand Annex B of Keeping Children Safe in Education, which sets out the role of the designated safeguarding lead.

The DSL is a member of the senior leadership team. The school's DSL is Sunita Vyas, Deputy Headteacher & Louise Mapp interim Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding, including online safety and understanding the filtering and monitoring systems and processes on school devices and networks.

During term time, the DSL or a trained deputy will always be available during school hours for staff to discuss safeguarding concerns. Availability will normally be in person, but the school may define suitable alternative arrangements in exceptional circumstances.

For out-of-hours and out-of-term activities, the school will put in place appropriate arrangements for access to safeguarding advice and ensure that the person leading the activity has the relevant contact details.

When the DSL is absent, the deputies – Jodie Waterton, Carissa Lichty, Hannah Bywater, Sam Carroll, Julie Sillince, John Laws, Paul Fernando-Thorne & Samanthat Morton – will provide cover. The DSL retains ultimate lead responsibility for safeguarding and child protection.

The school will maintain robust, clear and reliable cover arrangements for illness, leave or other absence. A confidential shared safeguarding mailbox or equivalent secure system will be monitored so that concerns can be received and acted on without delay.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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.
- Promote educational outcomes of vulnerable children and those with a social worker. They will encourage staff to maintain a culture of high aspirations for this cohort and support teachers to identify any specific challenges or additional academic support required.

- 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.
- Act as the Prevent lead: Make sure that staff have appropriate Prevent training and induction.
- Coordinate the school's contribution to universal and community-based early help, targeted early help and Family Help arrangements. This will include identifying when an assessment may be required, liaising with relevant agencies, supporting or acting as the Lead Practitioner where appropriate and ensuring that cases are regularly reviewed and escalated to children's social care where the child's circumstances do not improve or the level of risk increases.
- Understand the legal framework governing the processing and sharing of safeguarding information, including the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025, and support staff to share information lawfully, proportionately and without unnecessary delay.

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.
- 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 deputies are set out in their job description.

5.4. The Trustees and Local Community Councils

Safeguarding responsibilities are shared across the Trust. The Board of Trustees retains overall accountability for safeguarding, while Trust Leaders and Local Community Councils support the monitoring and implementation of safeguarding arrangements within each school.

5.4.1. The Board of Trustees

The Board of Trustees will:

- ensure that safeguarding and child protection are central to the Trust's governance, strategic decision-making and policy development;
- approve this policy at each review and ensure that it complies with current legislation and statutory guidance;
- hold Trust Leaders and headteachers to account for the effective implementation of this policy across all Trust schools;

- ensure that the Trust has regard to its duties under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, and locally agreed multi-agency safeguarding arrangements;
- ensure that appropriate provision is in place to support the mental health and wellbeing needs of children;
- ensure that all staff receive appropriate safeguarding and child protection training, including online safety, and that training is regularly updated in line with advice from the safeguarding partners;
- ensure that all staff, including those who do not work directly with children, read and understand at least Part One of Keeping Children Safe in Education;
- ensure that appropriate mechanisms are in place to confirm that staff have understood their safeguarding responsibilities;
- ensure that the Designated Safeguarding Lead has the appropriate status, authority, time, funding, training, resources and support to fulfil the role effectively;
- ensure that the Designated Safeguarding Lead has lead responsibility for safeguarding and child protection, including online safety and an understanding of the school's filtering and monitoring systems and processes;
- ensure that each school has clear and reliable arrangements for Designated Safeguarding Lead cover;
- ensure that appropriate filtering and monitoring systems are in place and that their effectiveness is reviewed at least once every academic year and following any significant change or safeguarding incident;
- ensure that the annual filtering and monitoring review is led by the senior leader responsible for filtering and monitoring, with support from the Designated Safeguarding Lead and appropriate IT support;
- ensure that checks cover all internet-connected devices in all relevant locations and that a written record is retained of the checks, findings and resulting actions;
- ensure that staff understand their responsibilities in relation to filtering and monitoring, mobile technology and generative artificial intelligence;
- ensure that online safety is treated as an integral and interrelated part of the whole-school safeguarding approach;
- ensure that procedures are in place to manage safeguarding concerns and allegations about staff, supply staff, trainee teachers, volunteers and contractors, including concerns that do not meet the harm threshold;
- ensure that the policy recognises the additional barriers that children with special educational needs, disabilities, medical conditions or physical health needs may face when abuse, neglect or exploitation is being identified;

- ensure that the Trust has effective procedures for making referrals to the Disclosure and Barring Service and the Teaching Regulation Agency where the statutory criteria are met;
- ensure that safeguarding information is processed, retained and shared in accordance with data protection legislation and statutory safeguarding guidance; and
- receive assurance from Trust Leaders about the effectiveness of safeguarding arrangements across the Trust.

The Board of Trustees will appoint a trustee with responsibility for safeguarding. This trustee will provide strategic oversight, support and challenge but will not undertake the operational responsibilities of the Designated Safeguarding Lead.

5.4.2. Trust Leaders

Trust Leaders will support the Board of Trustees by:

- monitoring the implementation and effectiveness of this policy across Trust schools;
- providing advice, support and challenge to headteachers and Designated Safeguarding Leads;
- reviewing safeguarding assurance information, including audit outcomes, training compliance, filtering and monitoring reviews and emerging safeguarding risks;
- escalating significant concerns or areas of non-compliance to the Board of Trustees;
- supporting schools to respond to changes in legislation, statutory guidance and local safeguarding arrangements; and
- reporting regularly to the Board of Trustees on the effectiveness of safeguarding across the Trust.

5.4.3. Local Community Councils

- understand the school's safeguarding responsibilities and the local context in which the school operates;
- receive appropriate safeguarding information from the headteacher and Designated Safeguarding Lead;
- monitor progress against actions arising from the school's annual safeguarding audit and provide challenge and support as appropriate;;
- seek assurance that this policy and the school's local safeguarding procedures are understood and implemented effectively;;

- report significant safeguarding concerns or areas of non-compliance through the Trust's agreed governance arrangements which has arisen through LCC activities;
- ensure that feedback from LCC visits linked to safeguarding are shared during Local Community Council meetings; and
- undertake safeguarding training appropriate to the role.

The Local Community Council does not hold operational responsibility for safeguarding cases and must not seek access to information that would identify individual children unless there is a lawful and necessary reason for doing so.

The Chair of the Local Community Council will act as the case manager where a safeguarding concern or allegation is made about the headteacher, unless the Trust determines that another suitably independent person should undertake the role. The case manager will follow the procedures set out in Appendix 3 and will seek advice from the Local Authority Designated Officer as appropriate.

5.4.4. Use of school premises by other organisations

Where another organisation provides services or activities on school premises, the Board of Trustees, through Trust and school leaders, will ensure that:

- appropriate safeguarding and child protection policies and procedures are in place;
- assurance is obtained and the organisation's policies are inspected where necessary;
- clear arrangements are in place for the organisation to liaise with the school about safeguarding matters;
- safeguarding requirements are included as a condition of any hire, lease or transfer-of-control agreement; and
- the agreement may be terminated where the organisation fails to comply with the required safeguarding arrangements.

All Trustees and LCC members will read Keeping Children Safe in Education in its entirety.

Section 15.3 of this policy has information on how Trustees and LCC members are supported to fulfil their role.

5.5. 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, as well as, understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation.

- 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.
- Ensuring that all staff undertake appropriate safeguarding and child protection, including online training, and updating the content of the training regularly.
- 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 (Nursery) is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

5.6. Virtual School Heads

Virtual School Heads have a non-statutory responsibility for the strategic oversight and promotion of the educational attendance, attainment and progress of children with a social worker. Recognising attendance as a safeguarding factor, they should work with local authorities to set and report on ambitious attendance targets.

They should identify and engage with key professionals, including DSLs, SENCOs, social workers and mental health leads, and also promote the educational achievement of children in kinship care in line with current guidance.

6. Confidentiality

6.1. Timely information sharing is essential to effective safeguarding.

6.2. Safeguarding information will be shared in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025, referred to collectively as data protection laws. These laws do not prevent justified safeguarding information sharing; they provide a framework for information to be shared lawfully, fairly, securely and proportionately. Staff and volunteers have a responsibility to share relevant information with those who need it to protect children and should follow the current government information-sharing advice for safeguarding practitioners.

6.3. Where special category personal data needs to be shared, the Data Protection Act 2018 includes safeguarding of children and individuals at risk as a relevant processing condition. Information may be shared without consent where consent cannot reasonably be obtained, where seeking consent would place a child or another person at risk, or where another lawful basis applies.

Before sharing information, staff should consider the purpose of sharing, what information is necessary and proportionate, the accuracy and security of the information, who needs to receive it, and the potential risk of sharing or not sharing. The decision and rationale should be recorded, including where a decision is made not to share.

6.4. If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff/volunteer tells the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

6.5. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk.)
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

6.6. Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

6.7. Staff/volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

6.8. The school will permit representatives of children's social care from the local authority in which the school is located and, where different, the local authority responsible for the child, to have access to the child where this is required to undertake, or determine whether to undertake, an assessment under section 17 or section 47 of the Children Act 1989.

6.9. The school will work in a coordinated way with children's social care, the police, health services, education providers and other relevant agencies when responding to child

sexual exploitation, child criminal exploitation, trafficking, modern slavery and other forms of extra-familial harm.

6.10. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

7. Physical contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils but it is crucial that they only do so in ways appropriate to their professional role. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age and stage of development. It is not possible to be specific about the appropriateness of each physical contact so staff should use their professional judgement at all times.

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

Staff may (as a last resort) legitimately physically intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. We do have a number of staff trained in positively handling children so please seek their assistance if necessary. Any use of reasonable force or restrictive intervention must be recorded and reported in accordance with the school's procedures set out in the Positive Support Policy. Parents or carers will be informed unless doing so would place the child or another person at increased risk.

Children with Special Educational Needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny. All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing).

This means that adults should:

- Be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described.
- Never touch a child in a way that may be considered indecent.
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny.
- Not prolong contact initiated by children unless the child requires this.
- Consider the way in which they offer comfort to a distressed pupil and whether other adults are present.
- Encourage pupils to act as independently as possible and to undertake as much of their own personal care as is practicable.

Where physical contact may be acceptable:

- When a pupil is distressed and needs comforting.
- When showing a pupil how to use a piece of apparatus or equipment, demonstrating a move or exercise during games or PE.

- When caring for pupils with particular needs (see intimate care and supporting children with medical needs policy).
- For first aid purposes.
- For care and intimate handling.

8. Recognising abuse and taking action

8.1. Every member of staff, including volunteers, working with pupils at our school are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

8.2. All staff know that it is their responsibility to report any concerns that they have and not to see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse, neglect and exploitation. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity.

8.3. Staff must not assume that another colleague or professional will take action or share information that may be critical to keeping a child safe. Every member of staff remains responsible for ensuring that their concern has been reported and appropriately considered. Where staff are uncertain about whether information should be shared, they must speak to the DSL or a deputy DSL without delay.

8.4. Any child may benefit from support before statutory intervention, including universal services, community-based early help or targeted early help through Family Help. All staff must be able to identify and recognise abuse, neglect, exploitation and modern slavery and should be particularly alert to additional support needs where a child:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is pregnant and/or a parent
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited

- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, or is placed in alternative provision or a pupil referral unit

8.5. If a child makes a disclosure

If a child discloses a safeguarding issue, staff must:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. The child's words must be recorded verbatim.
- Record on CPOMs and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.

- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop adults from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

8.6. The signs of child abuse might not always be obvious and a child might not tell anyone what is happening to them. Staff should therefore question behaviours if something seems unusual and try to speak to the child, alone, if appropriate, to seek further information; following guidance What to do if you're worried a child is being abused.

8.7. It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with this policy's procedures.

8.8. The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a pupil is at risk of harm must report it immediately to the DSL.

8.9. All concerns about a child or young person should be reported to the DSL without delay and recorded in writing on CPOMS. Any notes made in notebooks or on paper must be stored with the pupil's file as part of the incident record. Pages in notebooks must be removed.

8.10. Following receipt of any information raising concern, the DSL will decide the course of action to be taken. All information and actions taken, including the reasons for any decisions made, will be fully documented. The Threshold document can be used to support staff when making decisions about referrals.

8.11. Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If staff make a referral directly, they must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If a child is suffering or likely to suffer harm, or is in immediate danger, a referral to children's social care and/or the police must be made **immediately**. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

If the child is in **immediate** danger or at risk of **imminent** harm or danger, referrals must be made by calling First Response:

Greenwich MASH Team First response: **020 8921 3172** (Monday to Friday from 9am to 5pm) **020 8854 8888** (out of hours)

If it is an emergency, call the police on 999.

Less urgent concerns must be made through the Greenwich MASH team MASH referral and sent to **mash-referrals@royalgreenwich.gov.uk.**

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 take advice from local authority children's social care on the number above. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Staff should share any details of the actions they take with the DSL as soon as practically possible.

8.12. Universal services, community-based early help and Family Help

Any child may benefit from support before statutory intervention, including universal services and community-based early help. Where a child and family would benefit from coordinated or targeted support, a Family Help assessment should be considered in accordance with local arrangements.

The DSL will usually lead the school's liaison with other agencies and support the identification of an appropriate lead practitioner. A Family Help assessment may be led by a range of suitably skilled practitioners, including school staff, where local arrangements permit and the practitioner has the necessary skills, knowledge, time and supervision. Where child protection enquiries are being undertaken or a child is subject to a child protection plan, the lead practitioner must be a social worker.

Staff will be aware of the local criteria and levels of need for targeted early help, section 17 children-in-need services and section 47 child protection enquiries, together with the procedures for disabled children, children in the youth secure estate and concerns involving abuse, neglect or exploitation.

The child's wishes and feelings, the views of parents or carers and the strengths and support available within the wider family network will be considered. Consent should normally be sought for a Family Help assessment. A lack of consent must not prevent an immediate referral to local authority children's social care where there is reasonable cause to suspect significant harm.

The DSL will keep the effectiveness of support under regular review. If the child's situation does not improve, needs increase or there are concerns that the child is suffering or likely to suffer harm, the school will refer to local authority children's social care without delay. Local procedures and contact details are: Greenwich Family and Adolescent Support Service, https://www.royalgreenwich.gov.uk/xfp/form/863

Overview of Greenwich Early Help

Who it is for: Families living in Royal Greenwich with children and young people up to age 19, or up to age 25 if they have special educational needs and disabilities (SEND).

Core services: Family hubs, children's centres, parenting support courses, baby massage, and targeted family or adolescent support.

General advice: Contact the Families Information Service (FIS) by phone at 020 8921 6921 or via email at fis@royalgreenwich.gov.uk.

Practice management / Consultations: Professionals can use the consultation line available from 1:00 PM to 4:00 PM at 020 8921 4590.

Making a referral: Download and complete the Pathway to Early Help Tool and email the completed form to early-help-refer@royalgreenwich.gov.uk.

8.13. Escalation

Any member of staff who does not believe that concerns about a child have been responded to appropriately, or in accordance with this policy and the procedures of Greenwich MASH and Greenwich Safeguarding Children Partnership, they must raise the matter with the headteacher or Trust safeguarding lead and continue to escalate it until a satisfactory response is achieved. Staff may contact local authority children's social care directly where necessary.

The local safeguarding children partnership expects practitioners to share information appropriately, work to agreed plans and use constructive professional challenge where concerns are not being addressed. The school will follow the Greenwich Safeguarding Children Partnership Threshold document and escalation policy https://greenwichsafeguardingchildren.org.uk/home/greenwich-safeguarding-children-partnership/what-to-do-if-youre-worried/thresholds-flowchart/, seeking support from the DSL or Trust safeguarding lead as required.

The process of resolution should be kept as simple as possible and the aim should be to resolve difficulties at a professional practitioner level wherever possible. It should be recognised that differences in status and experience may affect the confidence of some workers to pursue this course of action and support should be sought from the schools DSL.

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

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

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This must be done by telephoning the police on 101, or 999 if appropriate. This is a mandatory statutory duty for teachers, and teachers will face disciplinary sanctions for failing to meet it. Other staff may still make the referral themselves or in conjunction with the DSL.

Unless the member of staff has been specifically told not to disclose by the authorities due to criminal investigation, they must also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** should speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff must not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

8.15. 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 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 the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team..

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Local Community Council members 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

8.16. If you have a concern about mental health

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

Only appropriately trained professionals should diagnose a mental health problem. Education staff are nevertheless well placed to observe pupils day to day, identify early warning signs and provide or secure appropriate support. Warning signs may include significant changes in behaviour, ongoing difficulty sleeping, withdrawal from social situations, loss of interest in usual activities, physical signs of self-harm or neglect of personal care.

Staff support four key functions: promoting positive mental wellbeing and preventing mental ill health; identifying pupils who may be experiencing or developing mental health problems; ensuring early targeted support is provided; and liaising with or referring to specialist services where needed.

If a mental health concern is also a safeguarding concern, staff must follow this policy and speak to the DSL or a deputy immediately. Where a child is in immediate danger, staff must call 999 or arrange for the child to be taken to accident and emergency immediately by a parent, carer or other suitable person.

Where urgent mental health help is needed but the situation is not an emergency, staff may seek help through NHS 111 online or by calling 111 and selecting the mental health option. The DSL should consider whether parents or carers should be informed to support the child's wellbeing, unless doing so would place the child at additional risk.

The school's senior mental health lead will support a whole-school approach to mental health and wellbeing. Staff will follow the school's mental health and wellbeing procedures and the Department for Education's guidance on mental health and behaviour in schools.

Woodhill work alongside CAHMs and the Mental Health in Schools team to provide support for children and families.

Trustees have a duty to ensure that the school provide appropriate provision to support the mental health and well-being needs of both children and staff.

8.17. Child-on-child abuse (including harassment and violence)

We recognise that children can abuse other children and that this can happen inside or outside school, face to face or online, and sometimes simultaneously in more than one context. Abuse will never be tolerated or dismissed as banter, just having a laugh, part of growing up or boys being boys. Even where there are no reports, staff will maintain an attitude that it could happen here and remain alert to times and places where risk may be heightened.

The school recognises that racism, faith-targeted abuse and other forms of discriminatory behaviour can have a significant impact on a child's welfare, wellbeing and sense of safety and will be considered within safeguarding practice where appropriate.

All child-on-child abuse is a safeguarding issue for both the victim and the child alleged to have caused harm. It is preventable, and timely, evidence-informed intervention may prevent harmful behaviour from escalating. We recognise that some forms of abuse are gendered, while ensuring that every report is taken seriously and responded to according to the needs of the children involved.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

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

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

See Appendix 4 for more information about 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:

- Staff must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence; ensuring that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge racism, misogyny/misandry, derogatory or sexualised language and inappropriate behaviour between children, including pressure to make, request or share sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
    - That even if there are no reports of child-on-child abuse, it may still be occurring or may not be being reported. Staff will promote and use the pupil reporting systems described in section 8.19 and will speak to the DSL about any concern without waiting for a direct disclosure.

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a consequence accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

8.18. Making or sharing nudes and semi-nudes

The school's response is based on the current UK Council for Internet Safety guidance on sharing nudes and semi-nudes for education settings. Every incident, whether consensual or non-consensual, requires a safeguarding response and proportionate risk assessment.

The school recognises that the creation, possession or distribution of sexual images of a child may constitute a criminal offence. However, incidents involving children will be managed in a proportionate and child-centred way. The primary concern will be the safety and welfare of the children involved, and children will not be unnecessarily criminalised for

behaviour that can be managed appropriately through safeguarding, education and support.

Staff responsibilities when responding to an incident

If staff become aware of an incident involving the making or sharing of nude or semi-nude image, including an AI-generated or digitally altered image, whether consensual or non-consensual and including digitally altered or AI-generated imagery, they must report it to the DSL immediately.

Staff must **not**:

- Intentionally view, copy, print, share, store or save the imagery, or ask a pupil to share or download it. Where it is unavoidable that an image is viewed or viewed accidentally, this must be reported to the DSL immediately and the decision and reasons must be recorded by the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Staff should explain that they need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any pupil in the images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through local neighbourhood police, dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships education and computing programmes.

Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

8.19. 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 systems are 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.

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.

- Make it clear to pupils that their concerns will be taken seriously, and they can safely express their views and give feedback.

- As part of our assembly schedule, including class assemblies, staff frequently talk to children about who htey can talk to if they are worried or scared.
- Children are informed that they can speak to any member of staff if they have worries or concerns (all staff complete mandatory safeguarding training).
- As part of our safeguarding training, adults are briefed on how to respond to children's concerns and disclosures so that the child does not feel penalised or judged for what they have shared.

8.20. Concerns about a member of staff, supply staff, trainee teacher, volunteer or contractor

If you have concerns about a member of staff, supply staff member, trainee teacher, volunteer or contractor, or an allegation is made that they may pose a risk of harm to children, report this to the headteacher as soon as possible. If the concern or allegation relates to the headteacher, report it to the chair of the Local Community Council.

The headteacher/chair of Local Community Council will then follow the procedures set out in Appendix 3, if appropriate.

Where there is a conflict of interest in reporting a concern or allegation to the headteacher, or the headteacher is unable to act, the matter must be reported directly to the local authority designated officer (LADO). The headteacher or case manager will also consider whether the concern should be referred to the LADO even where the harm threshold may not initially appear to be met.

If an allegation relates to an individual or organisation using the school premises for an activity involving children, the school will follow its safeguarding procedures, inform the LADO as appropriate and work with the provider to ensure the allegation is managed effectively.

LADO contact details:

Telephone: 020 8921 3930

Email: childrens-LADO@royalgreenwich.gov.uk
childrens-LADO@royalgreenwich.gov.uk.cjsm.net

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 3 for more detail).

Further guidance is also outlined in the Whistleblowing policy.

9. Notifying parents or carers

9.1. Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

9.2. 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. Contextual safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. Traditional approaches to protecting children from harm have focussed on the risk of violence and abuse from inside the home, usually from a parent/carer or other trusted adult and do not always address the time that children spend outside the home and the influence of peers on child's development and safety.

Contextual safeguarding recognises the impact of the public/social context on children's lives, and consequently their safety. Contextual safeguarding seeks to identify and respond to harm and abuse posed to children outside their home, either from adults or other young people. It is an approach that looks at how interventions can change the processes and environments, to make them safer for all children, as opposed to focussing on an individual.

Peer relationships are increasingly influential, setting social norms which inform young people's experiences, behaviours and choices and determine peer status.

These relationships are, in turn, shaped by, and shape, the school, neighbourhood and online contexts in which they develop. So, if children socialise in safe and protective schools and community settings, they will be supported to form safe and protective peer relationships. However, if they form friendships in contexts characterised by violence and/or harmful attitudes these relationships too may be anti-social, unsafe or promote problematic social norms as a means of navigating, or surviving in, those spaces.

Staff at Woodhill are aware that contextual safeguarding applies to risks outside the family that may cause significant harm. These include:

- Child-on-child and relationship abuse
- Criminal/ sexual exploitation/ online abuse
- Missing episodes
- Risks associated with gangs
- Risks associated with radicalisation
- Safeguarding risks in public spaces
- Trafficking and modern slavery
- Mental health and wellbeing

- Hardship

The school considers local safeguarding data, community intelligence and information from safeguarding partners when assessing contextual risk. The priority risks in the local area are:

County lines and child criminal exploitation

Child sexual exploitation

Radicalisation Exploitation through gangs

Online abuse

School staff work closely with families when we know or suspect that issues may be a concern. Many families share information with us once a trusting home-school relationship has been established. Staff throughout the school are trained to share information with a member of the Senior Leadership Team if they become aware of a problem.

We are able to give a range of support as required, including writing letters/completing paperwork, as well as, helping to explore other outside agencies which can support the family. The Senior Leadership Team share any concerns around vulnerable families, and have a good understanding of those families across the whole school.

11. Online safety and the use of mobile technology

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and the Behaviour Policy for mobile phone use, which can be found on our website:
https://www.inspirewoodhill.co.uk/page/?title=Policies&pid=56

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Local Community Council members
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Ensure our primary school operates as a mobile phone-free environment by default. Mobile phones must not be routinely used or accessible during the school day, unless a specific, justified exception applies (e.g., for medical requirements or individual pupil needs).

The 4 key categories of risk

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

- **Content –** being exposed to illegal, inappropriate or harmful material, including pornography, extreme sexual or physical violence, suicide or self-harm content, misogynistic or discriminatory material, misinformation and disinformation, and content which promotes harmful or dangerous behaviour.
- **Contact –** being subjected to harmful interaction with other users, adults posing as children, grooming, exploitation, coercion, harassment and interaction with generative artificial intelligence tools or applications that simulate a person or relationship.
- **Conduct –** personal online behaviour that increases the likelihood of, or causes, harm, including making, requesting, sending or receiving explicit imagery, the consensual or non-consensual making or sharing of nudes and semi-nudes, AI-generated deepfakes, online bullying and abusive, harassing or misogynistic/misandrist messages
- **Commerce –** risks such as online gambling, inappropriate advertising, phishing, financial scams and other forms of online financial exploitation

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Personal mobile phones should remain secure and out of reach for child during contact time when pupils are present, unless authorised by SLT

  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
  - Staff will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

- Make all pupils, parents/carers, staff, volunteers and Local Community Council members aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Maintain appropriate and resilient cyber security systems in alignment with the DfE's *Cyber Security Standards for Schools and Colleges*, recognising that protecting personal information and securing digital infrastructure is a fundamental and statutory safeguarding responsibility.
- Review online safety and the effectiveness of filtering and monitoring at least once each academic year, and following any significant change or incident, supported by a risk assessment reflecting the needs and risks of the school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

11.1. Artificial Intelligence (AI)

Generative artificial intelligence is increasingly accessible and can support teaching, learning and safeguarding when it is used safely and effectively. It can also facilitate bullying, grooming, fraud, misinformation, the creation of deepfakes or deep nudes, and access to harmful or inaccurate content.

The school will risk assess new AI tools before use and consider safeguarding, privacy, data protection, intellectual property, bias, accuracy, age appropriateness, transparency and the potential for misuse. Personal or sensitive information about pupils or staff must not be entered into public AI tools unless use has been formally authorised and appropriate controls are in place.

Any use of AI to create, alter or share harmful content, impersonate another person, groom, exploit or bully a pupil will be addressed under this policy and the school's

behaviour, anti-bullying and online safety procedures. The school's filtering and monitoring requirements apply to the use of AI on school systems and devices.

The school's filtering and monitoring arrangements will apply to the use of artificial intelligence on school systems and devices. Staff and pupils will be given age-appropriate guidance on checking the accuracy of AI-generated information, recognising manipulated or fabricated content and reporting concerns about harmful or inappropriate use.

12. Alternative provision

Where the school places a pupil with an alternative provision provider, the school remains responsible for safeguarding that pupil and must be satisfied that the placement is safe, suitable and meets the pupil's needs. This includes visiting the pupils regularly at the setting, these visits will be recorded on CPOMS.

The school will obtain written confirmation that appropriate safeguarding checks have been completed on people working at the provision and that the provider will notify the school of changes, including staffing or site arrangements, that may place the pupil at risk.

The school will know where the pupil is based during school hours, including the address of the provider and any subcontracted or satellite sites. The placement will be reviewed at least half-termly to assure regular attendance, safety, educational suitability and progress. Any safeguarding concern will trigger an immediate review and the placement will be suspended or ended where necessary unless and until concerns are satisfactorily resolved.

13. Pupils potentially at greater risk of harm

13.1. Pupils with special educational needs and disabilities

13.1.1. We recognise that pupils with special educational needs and/or disabilities (SEND), certain medical conditions or physical health needs can face additional safeguarding challenges online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability 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 concerns, including a risk that the pupil may not understand that what is happening to them is abuse
- A need for intimate care or increased isolation from peers and trusted adults
- Greater dependence on adults for care, communication, mobility or access to essential support

- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

13.1.2. All children, including disabled children and those with additional needs, have the right to be heard, protected and supported to achieve their potential. The school will provide additional pastoral attention and appropriate communication support, make reasonable adjustments and follow Working Together to Safeguard Children 2026 and the SEND Code of Practice.

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

13.1.4. Children have said that they need:

- **Vigilance**: to have adults notice when things are troubling them;
- **Understanding and action**: to understand what is happening; to be heard and understood; and to have that understanding acted upon;
- **Stability**: to be able to develop an on-going stable relationship of trust with those helping them;
- **Respect**: to be treated with the expectation that they are competent rather than not;
- **Information and engagement**: to be informed about and involved in procedures, decisions, concerns and plans;
- **Explanation**: to be informed of the outcome of assessments and decisions and how they have been reached, positive or negative;
- **Support**: to be provided with support in their own right as well as a member of their family;
- **Advocacy**: to be provided with advocacy to assist them in putting forward their views

13.2. Looked-after and previously looked-after children

13.2.1. 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

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

13.2.3. 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.

13.3. Pupils with a social worker

13.3.1. 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.

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

13.3.3. 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.

13.4. Young carers

13.4.1. The school will be alert to the needs of young carers and recognise that caring responsibilities can affect attendance, attainment, behaviour and wellbeing. Early identification is essential so that the child receives support at the right time.

13.4.2. The DSL and relevant pastoral staff will work with the pupil, family and appropriate external partners, including local authority and health services, to assess need, reduce inappropriate caring responsibilities and secure practical, emotional and educational support.

13.5. Safeguarding children with medical conditions

13.5.1. An incident relating to the management of a pupil's medical condition or allergy does not, by itself, require a safeguarding referral. A referral will be considered where the incident indicates that the pupil may be at increased risk of abuse, neglect or exploitation because of the condition.

13.5.2. This may include situations where relevant information about a pupil's medical condition is withheld from the school or where a pupil is repeatedly sent to school without essential medication, placing them at risk. The school will follow statutory guidance on supporting pupils with medical conditions and its own medical conditions and allergy procedures.

13.6. Home-educated children

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

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

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

13.7. Children who are absent from education

13.7.1. A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. 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.

13.7.2. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

13.7.3. The school recognises that when a child is not in school they may be vulnerable to, or exposed to, additional risks. We work with parents, carers and partner agencies to support regular attendance and identify safeguarding concerns at the earliest opportunity.

13.7.4. We follow the procedures below to ensure an appropriate safeguarding response to children who are absent from education, particularly where absence is repeated, prolonged or unexplained:

- An attendance register is taken at the start of the first session of each school day and once during the second session
- We make every effort to contact parents and carers and follow up with the emergency contacts held
- We hold at least two emergency contact numbers for each of the pupils on our roll wherever possible
- Staff will alert DSLs to any concerns raised regarding children who are absent from school
- The DSLs will meet regularly with the Attendance Lead, SENCo and other members of the pastoral team to ensure that each response is thorough and takes into account all the relevant information about individual children;
- We will follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- When removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files

13.8. Pupils who are questioning their gender

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

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

13.8.3. The school will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, the school will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

13.8.4. Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the pupil's welfare.

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

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

13.8.7. In accordance with statutory safeguarding requirements relating to school premises, the school provides separate toilets for boys and girls aged eight and over, and pupils should not use toilets designated for the opposite biological sex. Furthermore, children aged 11 and over will not share changing facilities or undress in front of members of the opposite biological sex, and overnight accommodation on school trips will remain single-sex. Where a child refuses to use the facility designated for their biological sex, the school will assess the situation on a case-by-case basis to consider whether alternative facilities can be provided without compromising the overall provision of single-sex facilities or the safety, privacy, and dignity of other children.

14. Record-keeping

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

14.2. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing– this also includes the use of CPOMs (a secure website used to record concerns). If you are in any doubt about whether to record something, discuss it with the DSL.

14.3. 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

14.4. Concerns and referrals will be retained in each child's secure safeguarding record on CPOMS. Any paper records that cannot be uploaded immediately will be stored securely, transferred to the electronic record as soon as practicable and managed in accordance with the Trust's retention schedule.

14.5. The DSL will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme etc.

14.6. 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.

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

14.8. 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 promptly and 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.

The DSL will consider whether relevant information should be shared with the receiving school in advance of transfer where this would enable support to be in place on arrival or assist an assessment of risk to the pupil or others, including concerns about serious violence, harmful behaviour or Channel support.

Where information indicates a risk to the pupil or others, for example where a pupil has carried, threatened with or used a knife or other weapon, the receiving school must assess the risk and put in place an appropriate safety and support plan before or as the pupil arrives. A direct discussion should take place between the DSLs of both settings.

Child protection files should always be kept by the education setting where the child is on roll. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they must be kept in accordance with data retention. In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend the school, DSLs may wish to take copies of chronologies etc.

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 members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the

school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

All volunteers will receive safeguarding induction and training appropriate to their role, including how to recognise abuse, neglect and exploitation, how to report concerns and the standards of conduct expected in the school.

15.2. The DSL and deputies

The DSL and appointed deputies will undertake child protection and safeguarding training at least every 2 years as stipulated by the 3 local safeguarding partners.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

15.3. Trustees and Local Community Council

All trustees and Local Community Council members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

- As the chair of Local Community Council may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

15.4. Recruitment – interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See Appendix 2 of this policy for more information about our safer recruitment procedures.

Safer recruitment training should be updated every 3 years.

15.5. Staff who have contact with pupils and families

All staff who have contact with children and families will have access to supervisions with their line manager or other appointed person which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues, should they wish to access this.

16. Complaints and concerns about school safeguarding policies

16.1. 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).

16.2. Other complaints

As a school, we have a Complaints Policy which encourages children and families to raise any comments and complaints with us which will follow a robust internal investigation process where appropriate.

The complaint policy states clearly the stages of complaints and where to escalate concerns following completion of process either through Ofsted or Education Skills Funding Agency (ESFA).

Safeguarding concerns should be raised with the school DSL immediately. Where this is not possible and where a child is in immediate danger or at risk of significant harm, the individual should contact the local authority children's social care service and/or police without delay. All visitors will receive or have access to information explaining how to report a concern and the conduct expected of visitors and contractors.

16.3. Whistleblowing

Whistleblowing is the procedure whereby academy-based staff, trustees and Local Community Council members can raise legitimate and genuine concerns about any form of wrongdoing or malpractice e.g., alleged misconduct relating to improper practices or fraud, any form of abuse of pupils or staff which fall outside the scope of other existing internal procedures.

The procedures laid out will allow staff to voice their concerns in the knowledge that these will be taken seriously and investigated thoroughly and impartially and there will be no repercussions against staff that raise matters in good faith. The procedure therefore aims to act as a deterrent to serious malpractice and also enables the academy to avoid public

criticism should such matters become public knowledge. The Whistleblowing policy can be found here.

The procedure is not a substitute for normal line management processes but in addition to them. Staff should always first consider using normal line management for raising concerns. This procedure should only be used where all other existing internal procedures are felt to be inappropriate or when a member of staff feels inhibited in going through the normal line management e.g., if a member of staff has a grievance, then it must be raised through the grievance procedure; it would not be appropriate for it to be raised through this procedure.

17. Monitoring arrangements

17.1. The Trustees will ensure the policy is reviewed at least **annually.** At every review, it will be approved by the Board of Trustees.

18. Links to other policies

This policy links to the following policies and procedures:

- Anti-bullying
- Attendance
- Behaviour
- Complaints
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Employee Handbook
- Equality
- First aid
- Health and safety
- Intimate Care
- Online safety
- Privacy notices
- Relationships and Health Education (RHE)
- Safer recruitment
- Staff Code of Conduct
- Supporting pupils with medical needs
- Whistleblowing

The above policies can be requested via the school office if not available through hyperlink.

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 one 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
- Verbal abuse, including persistent criticism, belittling or name-calling, which must be addressed through a safeguarding lens.
- 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, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including acts of penetration, whether with part of a person's body or an object, for example rape or assault by penetration, and non-penetrative acts such as masturbation, kissing, rubbing and touching over clothing.

Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education.

Children under the age of 13 can never provide valid consent to sexual activity. Sexual activity with a child under the age of 16 is an offence, regardless of whether the child appeared to agree to that activity.

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

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 endeavour to obtain references before interview where possible. 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 and safeguarding matters.
- 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.

The MAT holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual school to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

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

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
- Liaise with the applicant to obtain 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, a record of the results of the vetting checks will be kept, along with evidence of the recruitment decision taken
- Applicants may join the DBS Update Service when a DBS application is made or within 30 calendar days of the certificate issue date. Where the Update Service is used, the school will obtain consent, see the original certificate, verify identity, ensure the certificate is at the required level and for the correct workforce, and complete and record an online status check before relying on it
- 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
- Use the Department for Education's Check a teacher's record service, where applicable, to verify qualified teacher status, prohibition from teaching, section 128 directions and other relevant teacher-status information
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
    - 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
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

** Management positions are most likely to include, but are not limited to, headteachers and deputy/assistant headteachers.*

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.

Whilst the 'disqualification by association regulations' are no longer applicable to adults working in a school setting, all staff must inform the Headteacher about any circumstances, relationships or associations both within and outside school (including online) that may have implications for the safeguarding of children. These include any interactions with Social Care and the Police. Additionally, staff in relevant roles will be required to declare whether they are disqualified from working within a school setting due to certain criminal offences or reprimands.

Regulated activity

Regulated activity is defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026. A person will be engaging in regulated activity with children if they work frequently in a specified establishment, such as a school, or in connection with its purposes, where the work gives an opportunity for contact with children.

Regulated activity includes:

- Paid or unpaid work involving teaching, training, instructing, caring for or supervising children, providing advice or guidance on their physical, emotional or educational wellbeing, or driving a vehicle used only for children
- Other paid work in a specified place, including a school, where the work provides an opportunity for contact with children
- Relevant personal care or health care provided by, or under the supervision of, a regulated health care professional, even where this happens only once
- Any overnight activity that meets the statutory conditions, even where it occurs only once

From 1 September 2026, the supervision exemption from regulated activity no longer applies. A person who teaches, trains, instructs, cares for or supervises children on more than three days in a 30-day period, or at any time between 2am and 6am where the activity provides an opportunity for face-to-face contact with children, will be engaging in regulated activity. The school will ensure that the appropriate enhanced Disclosure and Barring Service check, including children's barred-list information, is obtained before the person undertakes regulated activity, subject only to any arrangements expressly permitted by law and statutory guidance.

Existing staff and volunteers

The Trust undertakes enhanced DBS checks on existing staff every three years as a Trust requirement. In addition, all relevant pre-appointment checks will be repeated for an existing staff member or volunteer where:

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a role that is not regulated activity into a role that is regulated activity; or
- There has been a break in service of 12 weeks or more

The Trust has a legal duty to refer a paid member of staff or volunteer to the DBS where the individual is removed from regulated activity, or would have been removed had they not left or ceased volunteering, and the Trust believes that the individual has:

- 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 referral criteria are met and the individual has been removed from regulated activity, suspended or redeployed away from regulated activity, dismissed, resigned or ceased volunteering. Referrals will be made as soon as possible and will include all relevant information available to the Trust.

Agency and third-party staff

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

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 teachers

Where trainee teachers are salaried by the Trust, we will carry out all mandatory pre-appointment checks and record them on the single central record.

Where trainee teachers are fee-funded, the initial teacher training provider is responsible for the necessary checks. We will obtain written confirmation that the provider has completed all checks the school would otherwise be required to perform and has judged the trainee 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

Any volunteer whose role involves teaching, training, instructing or supervising children frequently, on more than three days in a 30-day period, or overnight is engaging in regulated activity. The school will obtain an enhanced DBS check with children's barred-list information before the volunteer undertakes the activity, subject only to the permitted arrangements for a separate barred-list check while an enhanced certificate is pending.

Existing volunteers who become regulated activity from 1 September 2026 because of the Crime and Policing Act 2026 changes will have their children's barred-list status checked. The school may use a standalone barred-list check where it wishes to allow the volunteer to begin regulated activity while the enhanced certificate is pending, or where a recent enhanced certificate without barred-list information has been obtained and there has been no break in service.

Where the school is subject to the Early Years Foundation Stage statutory framework, volunteers must not be permitted to begin working within provision covered by the EYFS framework until the school has received the volunteer's enhanced DBS certificate, including children's barred-list information. The use of a separate barred-list check while an enhanced DBS certificate is pending does not permit a volunteer to begin working within EYFS provision.

Under no circumstances will a volunteer for whom no appropriate checks have been obtained be left unsupervised or permitted to undertake regulated activity.

For volunteers who are not engaging in regulated activity, the school will complete and retain a written risk assessment. This will consider the nature of the work with children, what is known about the volunteer, information available from referees or other employment and whether a basic or enhanced DBS check without barred-list information is appropriate.

Where a volunteer works across more than one setting and the period condition is met collectively, the settings will agree which organisation will apply for the enhanced DBS check with barred-list information. Volunteers will be encouraged to join the DBS Update Service, which is free for volunteers and supports portability between settings.

The school will also complete any relevant checks required under the Childcare Act 2006 and the 2018 Childcare Disqualification Regulations and will record its decision and risk assessment.

For volunteers engaged in regulated activity, the school will record on the SCR the same pre-appointment checks required for individuals undertaking regulated activity, including an

enhanced DBS certificate with children's barred list information. Where checks are undertaken for volunteers who are not engaged in regulated activity, these will also be recorded on the SCR. Where a risk assessment is undertaken to determine whether a volunteer who is not engaged in regulated activity should be subject to an enhanced DBS check, this will also be recorded.

Trustees and Local Community Council members

All trustees and Local Community Council members 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.

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

All trustees, Local Community Council members and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for Local Community Council members if they have retained or been delegated any management responsibilities.]
- 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 will obtain written confirmation that the provider has carried out the safeguarding checks that the school would otherwise perform on its own staff and that it will notify us of any arrangements, including staffing changes, that may place the pupil at risk.

Adults who supervise pupils on work experience

When organising work experience, the school will ensure that the placement provider has policies and procedures in place to protect children from harm and will consider health and safety requirements for the placement.

A person who teaches, trains, instructs, cares for or supervises a child on work experience frequently, on more than three days in a 30-day period, or overnight is engaging in regulated activity. A person included on the children's barred list must not be permitted to undertake regulated activity.

Other people in the workplace who are not involved in teaching, training, instructing, caring for or supervising the child are not engaging in regulated activity solely because a child is present. The school and placement provider may consider other lawful levels of DBS check where appropriate.

The school cannot require a work experience provider to obtain an enhanced DBS check with children's barred-list information for a person supervising a pupil aged 16 or 17 on work experience.

Appendix 3: Allegations of abuse made against staff, supply staff, trainee teachers, contractors and volunteers (including low-level concerns)

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 he or she 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 are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the headteacher or other nominated senior leader, or the chair of Local Community Council 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
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

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, trainee teachers and all contracted staff

If a concern or allegation relates to a person not directly employed by the school, including supply staff, a trainee teacher or contracted staff, the school shares safeguarding responsibility with the employment agency, business or initial teacher training provider. The school remains responsible for gathering the facts and managing the safeguarding process, while the third party will usually lead any employment, disciplinary or training action.

- 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 head teacher/LCC 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.

Where a concern or allegation relates to a trainee teacher, the initial teacher training provider will be involved in the same way as a supply agency. The school will lead fact finding and liaison with the LADO, police and children's social care as required, and the provider will cooperate fully and manage any training or disciplinary consequences.

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.

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

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.

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply staff, trainee 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 8.9 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 discuss the next steps with the LADO. The headteacher will be the ultimate decision-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

This appendix is based on the advice in Annex A of Keeping Children Safe in Education 2026.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents

can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. 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, neglect and exploitation, 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.

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. It may involve an 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.

Child criminal exploitation may be committed or facilitated by an individual, an organised network or a gang. A child may identify as a member of the group exploiting them and may be criminalised for activity carried out under coercion. The exploitation may constitute modern slavery and the DSL will consider the National Referral Mechanism and statutory modern slavery guidance alongside local safeguarding and police referrals.

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 (CSE)

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. It may involve an 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.

Child sexual exploitation may be committed by an individual or an organised network. Most child sexual abuse is committed by someone known to the victim. Children may be coerced into offending or other harmful activity as part of the exploitation and must be treated as children in need of protection rather than assumed to be acting freely.

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.

Cybercrime

Cybercrime is criminal activity committed using computers or the internet. It includes cyber-enabled crime, which can occur offline but is increased by technology, and cyber-dependent crime, which can only be committed using a computer.

Cyber-dependent offences under the Computer Misuse Act 1990 include unauthorised access to computers or networks, denial-of-service attacks and making, supplying or obtaining malware with the intention of committing further offences. Children with strong interests or skills in computing may become involved without understanding the legal or ethical implications.

Where there are concerns that a pupil is involved in, or at risk of being drawn into, cyber-dependent offending, the DSL will consider referral to Cyber Choices, the national preventative police programme led by the National Crime Agency, and will seek police advice where appropriate.

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. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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.

Operation Encompass is an information-sharing arrangement between the police and education settings. A statutory duty requires the police to notify a child's education setting where they have reasonable grounds to believe the child may be a victim of domestic abuse, including children connected to a household where police attended an incident, whether or not the child was physically present.

The DSL or trained key adult will receive and manage Operation Encompass notifications securely, put timely support in place according to the child's needs and update the safeguarding record. A notification does not replace normal safeguarding procedures or a referral to local authority children's social care where a child has been harmed or is at risk of harm.

Homelessness

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

The DSL will be aware of contact details and referral routes into 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.

Temporary accommodation notification duty

Local housing authorities in England are required to notify relevant education settings when a child is placed in temporary accommodation, where the required consent has been given. The notification enables the school to safeguard and promote the child's welfare and put support in place at the earliest opportunity.

The DSL will consider the effect of temporary accommodation on attendance, health, transport, learning, safety and family stability. The notification does not replace the school's existing safeguarding duties or a referral to local authority children's social care where a child has been harmed or is at risk of harm.

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 8.14 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 one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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 'one chance' rule, i.e., we may only have one chance to speak to the potential victim and only one 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 children's social services
- 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 the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
    - Negate or destroy the fundamental rights and freedoms of others; or
    - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
    - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **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 to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll 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 from becoming involved with or supporting 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 radicalisation into terrorism. 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 8.15 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.

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 no reports, that does not mean that this kind of abuse is not 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 making or sharing of nude and semi-nude images and/or videos, including digitally altered or AI-generated imagery
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse other children online, this may include abusive, harassing and misogynistic/misandrist messages; the non-consensual making or sharing of nudes or semi-nudes; and sharing abusive images or pornography with people who do not want to receive it.

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 8 of this policy, as appropriate. In particular, section 8.17 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.

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 transgender (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 8 of this policy, as appropriate.

Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with or using weapons, and may occur in the context of gangs, organised criminal networks, criminal exploitation, neighbourhood conflict or harmful peer relationships.

Indicators may include increased or unexplained absence, changes in friendships or association with older individuals or groups, a significant decline in performance, self-harm or changes in wellbeing, signs of assault or unexplained injury, and unexplained gifts or new possessions.

Risk can be increased by previous maltreatment, repeated suspension or permanent exclusion, alternative provision, offending, exposure to violence, unmet SEND or mental health needs, exploitation and instability at home or in the community. Staff will avoid stereotypes and assess each pupil's circumstances and protective factors.

Any concern that a pupil is carrying, threatening with or using a weapon, or is involved in or at risk of serious violence, must be reported to the DSL immediately. The DSL will consider referrals to children's social care and the police, information sharing with partner agencies, support for the pupil and others affected, and a safety plan. Where a pupil transfers setting, relevant risk information will be shared in advance in accordance with section 14.8.

Checking the identity and suitability of visitors

The school receives a range of visitors, including education and health professionals, social workers, guest speakers, performers, contractors, family members and people attending school events. The headteacher will use professional judgement to determine appropriate identification, assurance, escorting and supervision arrangements according to the purpose of the visit and the opportunity for contact with children.

The school will not request DBS checks, barred-list checks or sight of existing DBS certificates for children's relatives or other visitors attending events such as sports days. Visitors who are present in a professional capacity will have their identity checked and the school will obtain assurance that the appropriate DBS check has been completed by their employer where the activity requires it; the school will not normally ask to see the certificate itself.

The suitability of external organisations, speakers and resources will be considered in advance, including educational value, age appropriateness, safeguarding risk and whether any checks are required. All visitors must follow the school's signing-in, identification, mobile phone, supervision and safeguarding reporting arrangements:

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

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

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

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

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

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Ensure the child will be brought to the school office
- Telephone calls will be made to the parents/carers and other contacts, in the priority order as listed on Arbor

- If the school are unable to make contact with any of the contacts listed on Arbor by 4pm then the school may contact children's service and or the police to notify them of the non-collection and no contact has been made with parents/carers or other contacts listed for the pupil
- A member of staff will always stay with the child whilst they are in school
- The incidents could be recorded on CPOMs as a safeguarding concern
- Repeated occasions could also result in the school making a referral to children's social care

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Ask staff to support with the search for the child and communication will be kept with the senior leader coordinating the search
- Telephone calls will be made to the parents/carers and other contacts, in the priority order as listed on Arbor if they are not already aware that the child is missing and advise that a family member remains at the house in case the child turns up
- Depending on the circumstance causing the child to become missing, the age and development of the child – including any special educational needs, and the length of time the child has been missing, the school may contact other agencies such as children's social care or the police to inform them of the incident
- The incidents could be recorded on CPOMs as a safeguarding concern