



Child Protection and Safeguarding Policy

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2026-2027 changes

There are significant changes to this policy due to updates from Keeping Children Safe in Education 2026 and it should be read in full. Below is a list of substantive changes in guidance and where this appears in the policy:

- **Section 1:** Addition of arrangements for the absence of the school DSL
- Terminology changes from child-on-child abuse to child on child abuse (including harassment and violence) and clarification this could be a safeguarding concern for both the perpetrator and the victim.
- **Section 2.7** Changes to the tiered Early Help explanation and process. Now 2 stages to include a lower level 'community help' stage.
- **Section 3.1** addition of different forms of child on child abuse (including harassment and violence).
- **Section 4:** Online Safety no phones commitment added
- **Appendix 8:** modern slavery examples of identifying factors added
- Appendix 8: details added relating to Young Carers and required support
- **Appendix 8:** addition of 3 areas to consider when sharing information
- LGBTQ amended to reflect the KCSIE guidance of LBG throughout the policy
- **Section 8:** Addition of two paragraphs relating to sport and LBG students
- **Section 8:** clarification on alternative toilet use for gender questioning students
- **Section 10:** Further examples of the 4Cs of online safety added
- **SECTION D:** regulated activity definition updated
- **SECTION D:** definitions of visitors to school added
- **SECTION D:** Homeless students section updated to include the duty of LAs to inform schools of temporary housing arrangements and the need for schools to exercise safeguarding duties.

SECTION A: IMMEDIATE SAFEGUARDING CONCERN

‘Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play in safeguarding children.’

Keeping Children Safe in Education – September 2026

Section A	Who to contact in the case of a safeguarding concern.
Section B	The Safeguarding Policy
Section C	Safeguarding and Recruitment
Section D	Annex A: Further information

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

1. Make a referral to local authority children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger.
2. **Anyone can make a referral.**
3. Tell the DSL as soon as possible (see below).
4. If the DSL is not available, contact the Deputy DSL or the MAT Safeguarding Lead.

1.1 Reporting a Safeguarding Concern

Anyone with any concerns about the welfare of a student **MUST** report it to the Designated Safeguarding Lead or one of the deputies as soon as possible. The school’s safeguarding lead and deputies are:

	Jenny Holton Designated Safeguarding Lead Email: head@hpa.pmat.academy Phone number: 01904947180
	Charlotte Brett Deputy Designated Safeguarding Lead Email: cbrett@hpa.pmat.academy Phone number: 01904947180

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	Angie Russon Deputy Designated Safeguarding Lead Email: arusson@hpa.pmat.academy Phone number: 01904947180
	Vanessa Powell Deputy Designated Safeguarding Lead Email: vpowell@hpa.pmat.academy Phone number: 01904947180
	Lauren Gwinnell-Smith Deputy Designated Safeguarding Lead - EYFS Email: lgwinnell-smith@hpa.pmat.academy Phone number: 01904947180
	Hayley Dew Safeguarding Governor Email: hdew@hpa.pmat.academy
	Tori Nicholas- Brown MAT Safeguarding Lead Email: tnicholasbrown@pmat.academy Phone number: 01904 806005
	Angela Oswald Director of School Improvement and Strategy Safeguarding Email: aoswald@pmat.academy Phone number: 01904 806003

If you are unable to contact the Safeguarding Team, contact the relevant team below:

	York Schools	North Yorkshire Schools
Emergency Duty Team	03001312131	03001312131
Safeguarding Advisor	01904 555694	01609 535070

LADO	01904 551783	lado@northyorks.gov.uk 01609 798005
Chair of Governor (if the concerns is regarding the Headteacher)	Rob Newport rnewport@hpa.pmat.academy	
Early help / Child Protection referrals	MASH 01904 551900	MAST 0300 131 2 131 Open to SC 01609 797280

1.2 Trust Safeguarding Contacts:

The school is a part of the Pathfinder Multi Academy Trust. All staff within the Trust can contact the MAT's Safeguarding Lead: Tori Nicholas Brown for advice on **01904 806005** or email tnicholasbrown@pmat.academy and Angela Oswald, Director of School Improvement and Strategy aoswald@pmat.academy **01904 806003**

In addition, headteachers and heads of school may contact senior Trust leaders for support:

Senior Leader	Contact
Angela Oswald, Director of School Improvement and Strategy	aoswald@pmat.academy
Andrew Daly, CEO	adaly@pmat.academy

1.3 Local Authority Safeguarding Contacts:

The school works in partnership with the Local Authority on all aspects of safeguarding.

The Local Authority has designated officers (LADOs) to:

- Be involved in the management and oversight of individual cases
- Provide advice and guidance to employers and voluntary organisations
- Liaise with the police and other agencies
- Monitor the progress of cases to ensure that they are dealt with as quickly as possible
- Possible consistent with a thorough and fair process

	York Schools	North Yorkshire Schools
Details of the local authority Safeguarding arrangements	https://www.saferchildrenyork.org.uk/	https://safeguardingchildren.co.uk/
Local Authority Safeguarding Officer	Caroline Wood 01904 555695.	01609 535070

LADO	01904 551783 or by email at LADO@york.gov.uk .	01609 798005 or by email at lado@northyorks.gov.uk .
Out of Hours contact	03001 312131	03001 312131

Associated guidance flow charts and posters are available at <https://www.saferchildrenyork.org.uk/>.

1.4 Making a Referral

Where appropriate, a referral should be sent to the LADO using the [LADO Referral Form](#) (available on the website) giving as much detail as possible.

York Schools	North Yorkshire Schools
LADO Referral Form (available on the website) giving as much detail as possible. Completed forms should be emailed using secure mail (e.g. gcsx, pnn, cjsm, nhs.net, etc) to: lado@york.gov.uk .	Lado Referral Form Completed forms should be emailed using secure mail (e.g. gcsx, pnn, cjsm, nhs.net, etc) to: lado@york.gov.uk .

Completed forms should be emailed using secure mail (e.g. gcsx, pnn, cjsm, nhs.net, etc).

1.5 Further Safeguarding Contacts:

Local Area Team	01904 551900
Vicky Brook School Liaison Officer (York) North Yorkshire Police	Email: Victoria.Brook@northyorkshire.police.uk Work Mobile: 07741 173445
SENDCo	Charlotte Brett cbrett@hpa.pmat.academy
Assistant Director, Children's Specialist Services	01904 551550
Educational Psychologist	Rachael Lusby Rachael.Lusby@york.gov.uk
Safeguarding Advisor for Diocese of York	01904 699524 safeguarding@yorkdiocese.org

1.6 Whistle Blowing

The school is committed to the highest possible standards of openness, probity and accountability. In line with that commitment it encourages employees and others with serious concerns about any aspect of the school's work to come forward and voice those concerns. It recognises that certain cases will have to proceed on a confidential basis.

If you are not satisfied with the actions of those in school responsible for safeguarding, refer to the Trust's Whistle Blowing Policy on the Pathfinder website at:

The Whistle Blowing Policy makes it clear that staff can do so without fear of reprisals and is intended to encourage and enable staff to raise serious concerns within the school rather than overlooking a problem or publicly disclosing the matter.

<https://pathfinder.academy/wp-content/uploads/2025/03/Whistleblowing-Policy-2025-27.pdf>

1.7 Using this policy

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Definition	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child financially into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the Local Authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person/organisation with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.

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EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
HSB	Harmful Sexual Behaviour	HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in Local Authority care or where children's services have looked after children for more than a period of 24 hours.

LBG	Lesbian, bisexual, gay	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual, or other protected sexual or gender identities.
MAT	Multi academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in Local Authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
UKHSA	UK Health Security Agency	The UK Health Security Agency (UKHSA) is responsible for protecting every member of every community from the impact of infectious diseases, chemical, biological, radiological and nuclear incidents and other health threats.
RSHE/RSE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENDCo	Special educational needs and/or disabilities coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs and disabilities policy and provision of education to pupils with special educational needs and/or disabilities.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the Local Authority they work for, and all children who currently have, or previously had, a social worker.

SECTION B: CHILD PROTECTION AND SAFEGUARDING POLICY

The school is committed to ensuring they fulfil their responsibility to provide a safe environment in which children can learn. We promote a climate where students and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others.

This policy has been developed in accordance with the principles established by the relevant legislation:

- Children Acts 1989 and 2004; (as amended)
- **Children's Wellbeing and Schools Act 2026**
- Education Act 2002 (as amended)
- [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)

This policy is also written in line with government publications:

- Working Together to Safeguard Children 2026
- Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' 2000
- What to do if You are Worried a Child is Being Abused 2015
- Keeping Children Safe in Education September 2026

2.1 Aims

This policy sets out a clear and consistent framework for delivering this commitment, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

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

2.2 Roles and responsibilities

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

The Local Governing Committee takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly covering: 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), concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support, what constitutes sexual harassment and sexual violence and why they're always unacceptable.

There is a zero-tolerance approach to abuse including misogyny and this will not be passed off as 'just banter' or 'boys being boys'.

Local Governing Committee

The LGC will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior LGC member to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Ensure online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

- Ensure that the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Seek assurance that the other bodies operating at the school have appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).
- Read Keeping Children Safe in Education in its entirety.

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 that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- 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 (where the school has one) is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting
- Ensure that the school liaises, when required, with the Virtual Schools Headteacher.

Designated Safeguarding Lead and team

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

- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Please refer to Section A for contact details.
- When the DSL is absent, the Deputy Safeguarding Lead and Safeguarding Team will act on their behalf

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 (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Have appropriate Prevent training and knowledge

The DSL will also:

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

Teachers and all school staff

All staff will:

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

All staff will be aware of:

- Our policies and protocols that 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 the behaviour policy, online safety policy and filtering and monitoring processes and the safeguarding response to children who go missing from education/who are absent from education.
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as

Child-on-child abuse (including harassment and violence), grooming, child sexual exploitation (CSE), child criminal exploitation (CCE) including financial exploitation and stalking, indicators of being at risk from or involved with serious violent crime, FGM, radicalisation, serious violence (including that linked to county lines).

- 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 importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual (LGB) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

2.3 Confidentiality

School staff following the guidance in this policy should ensure the following is considered alongside confidentiality:

- Timely information sharing (essential to effective safeguarding)
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- 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 doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

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
- The definition of rape is when a person uses their penis without consent to penetrate the vagina, anus, or mouth of another person. The example of "rape or oral sex" is replaced with "rape or penetration with an object" — the latter being a legally recognised form of sexual assault.

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
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in Section 3.

2.4 Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help (either at a community level or at a targeted level through Family Early Help) for a child who:

- 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 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 experienced multiple suspensions and is at risk of, or has been permanently excluded

2.5 If a child makes a disclosure

If a child discloses a safeguarding issue to you, you should:

- 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.
- 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.
- Log any actions and written information on CPOMS.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority 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.
- For more information, refer to Appendix 1.

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

FGM comprises of "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 Annex A 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 or with support of the school's DSL and involve local authority children's social care as appropriate.. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must 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 should not examine pupils.

2.7 Tiered Early Help assessment

Where the DSL and school leaders decide a child does not need a referral to a statutory service (Family Early Help), Universal and community based Early Help might be determined and delivered .This level of Early Help is provided through universal services and other voluntary and community services. This includes universal services such as education and health services, as well as support delivered through Best Start Family Hubs, youth services, after school clubs and housing provision.

If a Family Early Help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. This statutory route may be most suitable for children or young people who:

- are pregnant and/or are a parent themselves,
- have exhibited early signs of abusive, violent and/or harmful behaviours,
- have been repeatedly removed from the classroom
- are on a part-time timetable
- Victims or perpetrators of sexual harassment and sexual violence

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

2.8 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.

1. Seek advice from local authority children's social care.
2. Make a referral to local authority children's social care directly.

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

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

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

2.9 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by contacting the DSL and:

- Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.
- Staff will however, be aware of potential warning signs as listed in KCSiE:
 - Significant changes in behaviour
 - Ongoing difficulty sleeping
 - Withdrawing from social situations
 - Not wanting to do things they usually like
 - Physical signs of self-harm or neglecting themselves
- Staff will be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.
- Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or a deputy. The DSL may then refer to specialist services where needed.

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

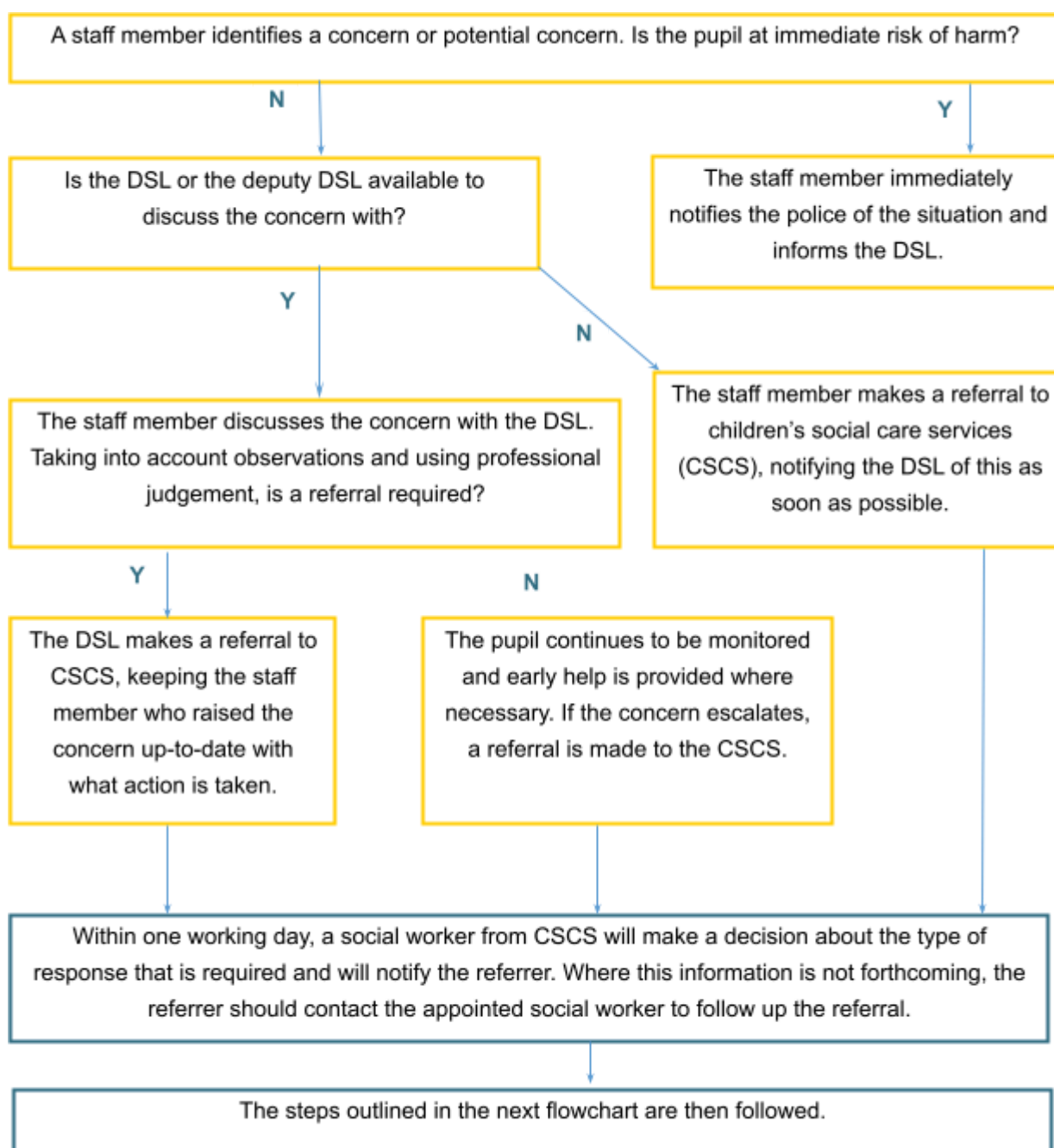
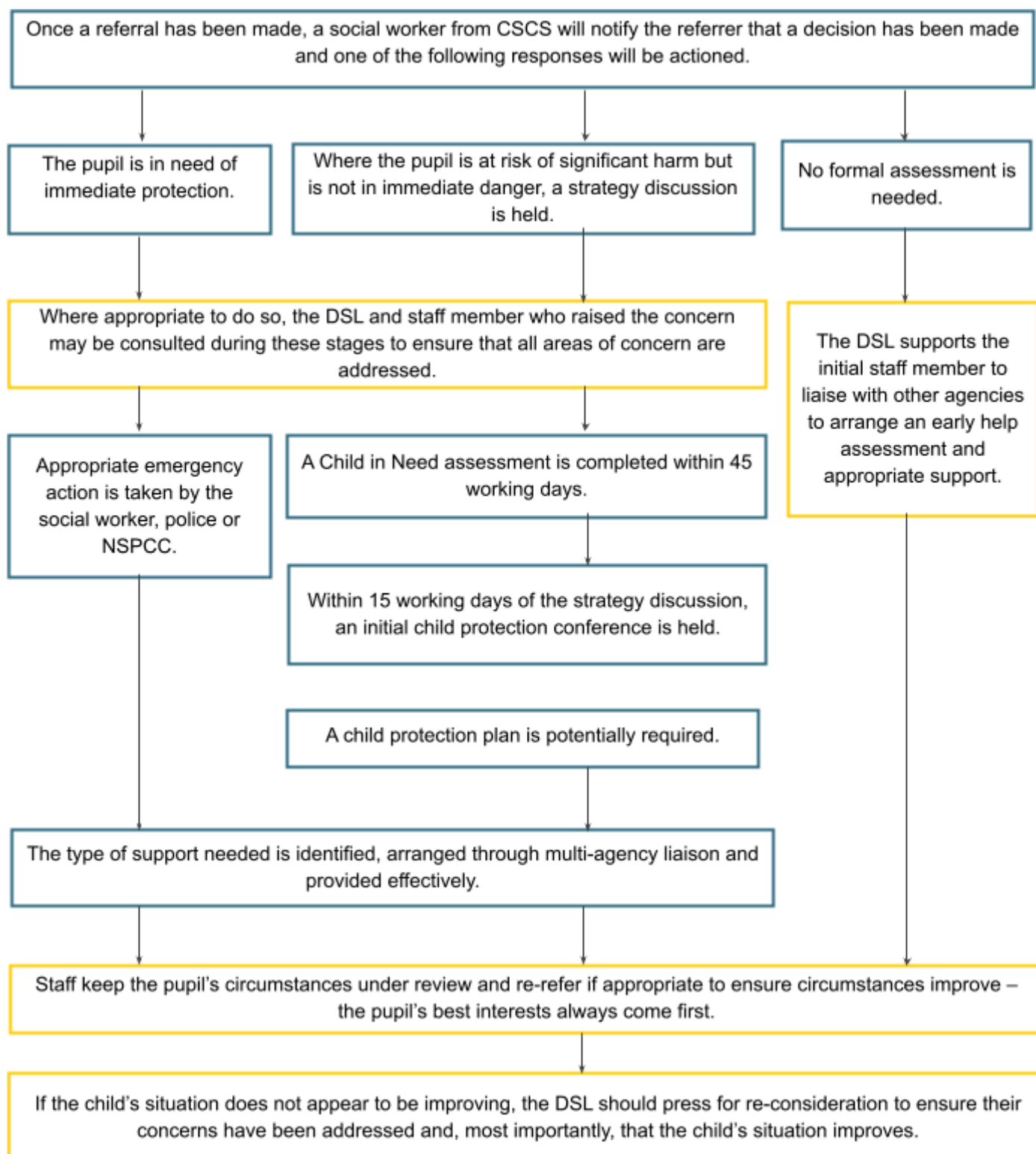


Fig 2 Procedure after making a referral

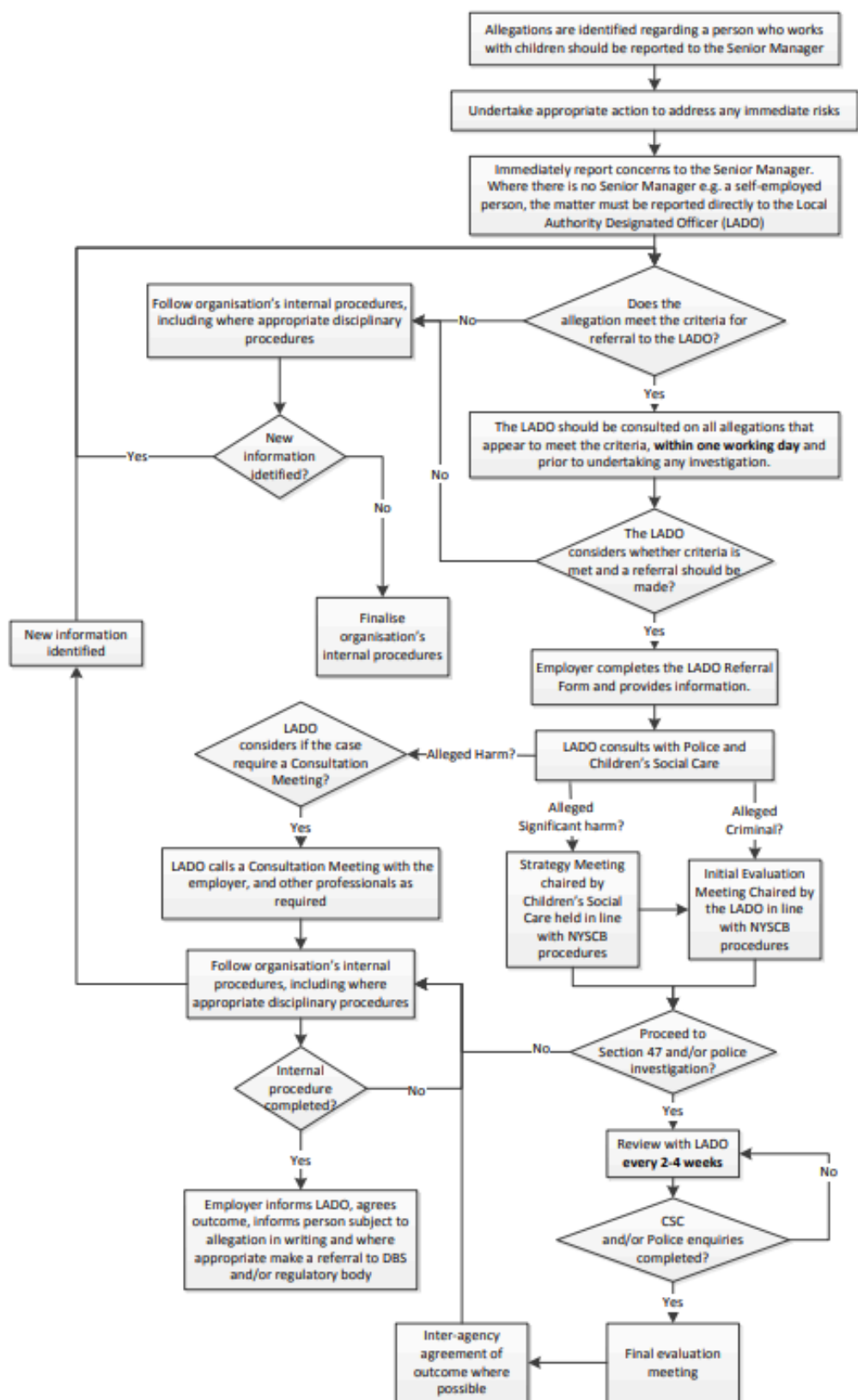


3.0 Concerns about a staff member, supply teacher, trainee teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the Chair of Governors.

If an allegation is made about a member of staff, follow the flow chart:

<https://www.safeguardingchildren.co.uk/wp-content/uploads/2024/10/LADO-Flowchart-Allegations.pdf>



3.1 Allegations of abuse made against other pupils

Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. Some (but not all) forms of child-on-child abuse (including harassment and violence) evidence that it is likely that girls will be victims and boys’ perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously,

All Child-on-child abuse (including harassment and violence) is unacceptable and will be taken seriously. Child-on-child abuse (including harassment and violence) can be a safeguarding issue for both the victim and perpetrator of child-on-child violence.

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. This might include where the alleged behaviour:

- Involves bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- involve physical threats and the use of weapons
- Involves abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- Involves harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- Involves physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
- Involves consensual and non-consensual making or sharing of nudes and seminudes, including those generated using AI
- 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,
- upskirting (which is a criminal offence), which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Involves initiation/hazing type violence and rituals.

Procedures for dealing with allegations of Child-on-child abuse (including harassment and violence)

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

- You 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.
- 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.

It is important to be vigilant and alert to the possibility of child-on-child abuse (including harassment and violence).

3.2 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), **you must report it to the DSL immediately.**

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to 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

You should explain that you 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 their SEN)
- 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 dialling 101 or 999. .

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE and PHSE and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes at an age appropriate level:

- 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

3.3 Reporting systems for our pupils

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

4 Online safety and the use of mobile technology

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 a no phones (gate to gate) policy with a no phones environment
- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- 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

Staff should be familiar with the schools Online Safety (E Safety) Policy and have due regard to the school's AI Policy.

5. Pupils with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

Further information can be found in the department's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All Local Authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](https://councilfordisabledchildren.org.uk)
- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- [NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#) and [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

6. Pupils with a social worker

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

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

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

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

7. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

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

8. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or questioning their gender can be targeted by other children. We also recognise that pupils who are lesbian, gay, or bisexual or questioning their gender are more likely to experience poor mental health. Any concerns should be reported to the DSL. When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there must be no exceptions. Where there are no safety concerns and a child makes a request relating to how they participate, we will need to consider the request in light of the advice on considering requests for support with social transition. This means that the school will take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

KCSIE provides a full decision-making framework for requests to support "social transition" – prioritising the school's duty to all children, Paragraphs 251- 282 and the school will refer to this to inform their actions.

Regulations and safeguarding requirements relating to school premises

The school follows the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 which apply to both maintained schools, academies and independent schools and reflects schools' safeguarding obligations. Toilet arrangements for individuals who are gender questioning will be provided through:

- Toilets provided for two biological sexes (male and female)
- Alternative toilet facilities which do not compromise the single-sex facilities
- Clear record keeping of alternative toilet arrangements
- Regular review of alternative toilet arrangements

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying. We will refer to the Department for Education guidance when deciding how to proceed.

9. Record-keeping

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

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

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

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

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

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

10. Online safety

The school will adhere to the Online Safety Policy at all times. As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories, extreme sexual or physical violence.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes, generative AI applications that simulate this.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams, sending and receiving explicit images, including those generated using AI

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

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

Reviewing online safety

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

Filtering and monitoring

The Trust will ensure that suitable filtering and monitoring systems are in place to prevent children accessing inappropriate or harmful material, in accordance with the Trust's Online Safety Policy. The Trust will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions on teaching and learning.

Roles and responsibilities:

- The Trust is responsible for ensuring suitable filtering and monitoring systems are in place in the school
- The headteacher, designated safeguarding lead and school business manager are responsible for ensuring that the filtering and monitoring systems remain effective and report any issues to the Trust.
- The headteacher, designated safeguarding lead and school business manager are responsible for following up on any inappropriate or harmful content identified by the system.
- The Trust will review the filtering and monitoring system on an annual basis to ensure it remains effective. The review will include a check that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

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

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Acceptable Use Policy.

Photographs and Videos

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the Trust's Data Protection Policy. Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff members will not use personal mobile phones or cameras when pupils are present unless for educational purposes. Staff may use mobile phones in the staffroom during breaks and non-contact time. Mobile phones will be safely stored and in silent mode whilst pupils are present. Staff will use their professional judgement in emergency situations.

Mobile devices can only be used to take 'appropriate images' for use on the school's social media channels that are downloaded as soon as possible and then deleted from the device immediately after.

The sending of inappropriate messages or images from mobile devices is strictly prohibited. Staff who do not adhere to this policy will face disciplinary action.

The headteacher/school business manager will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from the headteacher or school business manager.

The school will adhere to the terms of the Online Safety Policy and Acceptable Use Policy.

Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and Managing Allegations Made Against Staff Policy.

11. Training

The school delivers mandatory training on an annual cycle.

11.1 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 becoming involved with or supporting 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.

Volunteers will receive appropriate training, if applicable.

11.2 The DSL and DDSLs

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

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.

11.3 Governors and Trustees

All governors receive training about safeguarding and child protection (including online safety) at induction, which is repeated every 4 years. 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

Training for all governors includes: Reading KCSIE, completing safeguarding fundamentals training, Prevent training, Cyber training, GDPR and data training.

As the chair of governors 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. Further training is made available so that a governor has safer recruitment training.

11.4 Recruitment – interview panels

At least 1 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.

11.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

12 Monitoring and review

This policy is reviewed at least annually by the DSL and the headteacher. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

SECTION C: SAFEGUARDING AND RECRUITMENT

Safer Recruitment

The safe recruitment of staff is the first step to safeguarding and promoting the welfare of the young people in education. We are committed to safeguarding and promoting the welfare of young people and expect all staff and volunteers to share this commitment. It is recognised that this can only be achieved through sound procedures, good inter-agency cooperation and the recruitment and retention of competent, motivated employees who are suited to, and fulfilled in the roles they undertake.

As part of the shortlisting process schools carry out an online search as part of their due diligence on all shortlisted candidates. This is to help identify any incidents or issues that have happened, and are publicly available online, which the schools might want to explore with the applicant at interview.

All shortlisted candidates will be informed that an online search will be conducted as part of the recruitment process.

The guidance in KCSIE 2025 (Part Four) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

The SLT members who are involved in recruitment and at least one member of the LGC will also complete safer recruitment training (through the NSPCC) to be renewed every 5 years.

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

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, perform:

- a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children. Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight.

Some activities are always regulated activities, regardless of frequency. This includes:

- relevant personal care, or health care provided by or provided under the supervision of a health care professional;
- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional

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

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK. The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors. Any person volunteering in a role involving teaching, training, instructing or supervising children on more than 3 days in a 30-day period, or overnight are therefore in regulated activity regardless of supervision. This means volunteer recruitment processes must include a DBS check.

You can read the full Safer Recruitment Policy on the Pathfinder Portal:

<https://sites.google.com/pmat.academy/pathfinderportal/policies-and-procedures/hr-policies?authuser=0>

- All members of staff and volunteers are provided with child protection awareness information at induction so that they know who to discuss a concern with.
- All members of staff are trained in and receive regular updates in e-safety and reporting concerns.
- All staff and volunteers understand their responsibilities for being alert to signs of abuse and referring these to the DSL.
- All other staff and governors have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

Ongoing suitability

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

Referral to the DBS

Referrals should be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as it relies on the quality of information provided by the school or college when considering the referral.

Single central record (SCR)

The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

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 academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

All members of the proprietor body are also recorded on the SCR.

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 section 128 check
- A check of professional qualifications
- 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
- The school is free to record any other information it deems relevant.
- The details of an individual will be removed from the SCR once they no longer work at the school.

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 and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR.

If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Staff Induction

All staff receive the following induction training when they first start at the school: The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Behaviour Policy
- The Staff Code of Conduct
- The safeguarding response to children who are absent from education
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs
- A tutorial from our Designated Safeguarding lead, covering policies, procedures for reporting safeguarding concerns, best practise and scenario based discussions.
- On-line training including Child Protection Training
- Prevent Training

It is each member of staff's responsibility to apply the training, and must return their Certificates to the DSL. All students receive the following induction training when they first start at the school:

- Code of conduct – covering do and don'ts,
- Lanyards
- Who to talk to and where to go for advice

Training

Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated on a termly basis or whenever there is a change in legislation. Ongoing training includes:

- All staff receive regular training throughout the year (all governors must also complete relevant safeguarding training). All staff must read “Keeping Children Safe in Education Part 1” and complete the On-line training including Child Protection Training (TES) annually.
- It is each member of staff’s responsibility to apply the training and when completed handing in the certificate to the DSL.
- The Child-on-child abuse (including harassment and violence) procedures.
- The Staff Code of Conduct.
- Information about the role and identity of the DSL and deputy DSLs.

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

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- Updated online safety training.
- All students receive regular training via notices, assemblies, lessons and individual support as required. There is also a weekly safeguarding question and answer with a short explanation in the weekly staff bulletin.

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

The DSL and deputy DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

The DSL and deputy DSL will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent Duty and equip them with the knowledge needed to advise staff.

The DSL and their deputies will undergo online safety training to help them recognise the additional risks that pupils with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support pupils with SEND to stay safe online

Online training will also be conducted for all staff members as part of the overall safeguarding approach.

School Site Security

We keep the school safe and secure by:

- Regularly reviewing and assessing the site of all school buildings
- Considering further safeguarding measures such as the use of CCTV
- Keeping entrances to and from the building locked
- Using a clear signing in system

- Using a lanyard system.
- We regularly remind all staff and students that they have a responsibility to either challenge or inform the nearest member of staff of anyone in the school without a lanyard or following our rules regarding lanyards
- Completion of Health and Safety Audits and following our policy.
- Like all schools we hire out our facilities and will have contractual staff on site at various times. We have suitable policies and procedures that includes following guidance from Part 4 of Keeping Children Safe in Education 2026.

Further details on the above can be provided when visiting our school.

Visitors and lanyards

All visitors **MUST** be signed in at the main school reception.

If a visitor has a suitable DBS, they will be assigned a “white” lanyard and will be free to walk around the building unaccompanied, otherwise they will be assigned a “red” lanyard and must stay with a member of staff at all times. They cannot be left unaccompanied at any time and **MUST NEVER** be left with a student at any time.

Visitors are grouped in 3 categories:

Professionals	Educational psychologists, social workers etc
Educational visitors	Guest speakers, performers etc
Site related	Contractors, children’s family members, sports day attendees etc.



Pathfinder
Multi Academy Trust

Know Your Lanyards

Everyone in school must wear a lanyard



Anyone wearing a **red lanyard** must be accompanied by a member of staff at all times.

If you see anyone with a **red lanyard** without a member of staff with them or someone not wearing a lanyard at all, report them to the nearest member of staff immediately.

The following are free to walk around the school site:

- School staff wearing a blue lanyard
- Pathfinder MAT staff wearing a blue lanyard
- Visitors who have provided a suitable DBS on a white lanyard

All other visitors must:

- Wear a red lanyard
- Be accompanied by a member of staff at all times

All staff must challenge anyone who does not meet the above criteria. All students must inform a member of staff of anyone who does not meet the above criteria.

Trips and visits

Trips and visits are a vital and essential part of school life. The safety of our students and staff are paramount and as such, trips and visits must have a risk assessment completed via Evolve. Once the Evolve list has been completed this is then signed off by the headteacher/DSL.

Sports clubs and extracurricular activities

Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.

Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

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

Storage of School records

We ensure that all information is kept confidential at all times and paper records are kept in a locked cabinet in a locked cupboard. The DSL and deputies only have access to this. Alongside this record keeping the school uses CPOMS which is a safeguarding and Child Protection software for schools. Appropriate access is given to members of the pastoral team. All Records are kept for 25 years in accordance to UK GDPR.

Transfer of records

When a student transfers to another school the new school is contacted and the records are delivered by hand if the school is local or sent by recorded delivery. CPOMS automatically transfers the record if the new school has CPOMS also. This will occur within 5 days of a transfer in-year or within the first 5 days of a start of a term for new starters.

When a student transfers to our school from another school a letter requesting a student's CP record is sent to their previous school.

SECTION D: APPENDICES

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

Appendix 1 : SAFEGUARDING PROCEDURES AND PROTOCOLS

Receiving Disclosures

Below is advice on protocols staff should follow when receiving a disclosure:

Receive

- Listen, try not to look shocked or be judgmental
- Believe what they say, accept what they say and take it seriously
- Don't make them feel bad by saying "you should have told me earlier"
- Don't 'interrogate' them – let them tell you, try not to interrupt
- Note the date and time, what was done, who did it, and where it took place
- Don't criticise the perpetrator
- Don't ask leading questions – use 'open' questions to clarify only (T.E.D)

Tell me what you mean by that?

Explain that to me

Describe that....

Reassure

- Stay calm, tell the young person they've done the right thing in telling you
- Reassure them they are not to blame
- Empathise – don't tell them how they should be feeling
- Don't promise confidentiality, explain who needs to know
- Explain what you'll do next
- Be honest about what you can do

Report and Record

- Make a brief, accurate, timely and factual record
- Discuss with the Designated Safeguarding Lead (DSL) or their Deputy, without delay
- The DSL will assess the situation and decide on the next steps

Things to include:

- Time and full date of disclosure/incident and the time and full date the record was made
- An accurate record of what was said or seen, using the child's words as appropriate
- Whether it is 1st or 2nd hand information
- Whether the child was seen/spoken to
- Whether information is fact/ professional judgement
- Full names and roles/status of anyone identified in the report
- Sign the record with a legible signature.
- Record actions agreed with/by the Designated Lead (SMART)

- Avoid acronyms/jargon/abbreviations

Review records regularly; add any new concerns and respond to these immediately.

Staff Referral

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy. However if the concern does not require immediate action and can be addressed by the end of the day staff can either email or fill out the Child Protection concern form, see APPENDIX 1.

Members of staff also need to record on CPOMS their concerns and alert DSL

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately.

If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.

When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

Staff referrals direct to social services or the police

Anyone can refer a safeguarding concern direct to the social or the police. They do not have to refer via the DSL. If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

Direct referrals can be made to the Multi-Agency Safeguarding Hub (MASH) on 01904 551900.

Staff actions following a referral to social services

Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.

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

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL on the schools safeguarding database CPOMS.

Managing referrals

The reporting and referral process outlined in Appendix 2 will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS.

Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm.

Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so.

Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.

The school will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

Supporting staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

The DSL and deputies have the opportunity to receive 'Supervision'. This can be in the form of peer 'supervision' or from an external source.

Inter-agency working

The school contributes to inter-agency working as part of its statutory duty.

The school is aware of the expected timeline for its LSCB to fully transition to a new system of three safeguarding partners.

The school will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help. When deciding what information to share, the school will:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

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

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils.

If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.

The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

Working with Outside agencies

Very few staff will ever have to work with outside agencies, (e.g. CAMHS, Police, Children's Services, CIN Workers, Youth Workers, YOT workers, IDAS workers, Lifeline), if you have contact with outside agencies then you need to ensure that our Designated Safeguarding Lead (DSL) is fully aware and that if they visit school for a meeting with a student the following procedures are followed:

- Inform our DSL
- DSL will book a suitable room
- DSL will inform the office
- The office will check they have proof of identification and are allocated a white lanyard.
- DSL will ensure if it is a regular meeting it is held at a different time each week to avoid the same lesson being missed.
- DSL will act as the appropriate adult if a student is being interviewed by the police and parents cannot attend.

Working with the police

The following is the school's policy for working with the police.

We will...

- Share students names and addresses to identify suspects and to help safeguard students
- We will accommodate the police when wanting to interview students in school. On these occasions the police seek parental permission and if a parent cannot attend then DSL or a suitable MOS must be in the interview.

We will not...

- divulge any information that we feel is not relevant .

Working Together to Safeguard Children 2026

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015) supports frontline practitioners, working in child or adult services, who have to make decisions about sharing personal information on a case by case basis. The advice includes the seven golden rules for sharing information effectively and can be used to supplement local guidance and encourage good practice in information sharing.

EHA, Child in Need and Child Protection

In our school we ensure that we follow the Local Authority children's services protocols and practices and work, on behalf of our students and families, is of a consistently good standard. We use these standards to challenge other workers on behalf of children and young people where the standards are not being met.

Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the Data Protection policy.

Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.

Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

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 doesn't consent to sharing information, staff may still lawfully share it if there's 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.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

During disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.

- Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others.
- Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved.

Discussions with parents will not take place where they could potentially put a pupil at risk of harm.

Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.

Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes etc. with the reasons behind decisions being explained and the available support discussed.

External agencies will be invited to these discussions where necessary.

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

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

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.

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL

Appendix 2 DEFINITIONS OF ABUSE/ FORMS OF ABUSE

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

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

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

Appendix 3 LOW LEVEL CONCERNS

Concerns that do not meet the harm threshold will be documented and stored according to the guidance outlined in KCSiE and in line with retention of school records. Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the 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 harm 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

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

Appendix 4: SPECIFIC SAFEGUARDING CONCERNS

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, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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.

Homelessness

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

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

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

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

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

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

FGM

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

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

The DSL will:

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

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 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 (including harassment and violence) 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, bisexual or gay (LBG) 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, report directly to the DSL.

Serious violence

Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation

ACTION:

- **Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy).**
- **The DSL in combination with senior leaders, should, depending on the risks, put in place a safety plan and support plan.**

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

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

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

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

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

Appendix 5 IDENTITY CHECK FOR VISITORS

Checking the identity and suitability of visitors

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

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

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

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

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

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

Appendix 6 NON COLLECTION

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

- Try to establish contact with all adults listed on the school's MIS system
- Liaise with the local Safeguarding Hub
- Liaise with the Police if the above is unsuccessful

Appendix 7 LEGAL FRAMEWORK

This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Children and wellbeing act 2026
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- 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.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

Statutory guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2026) 'Keeping children safe in education'

- DfE (2018) 'Disqualification under the Childcare Act 2006'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Recruit teachers from overseas'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2022) 'Searching, Screening and Confiscation advice for schools'

Other relevant school and trust policies include:

- MAT – Safeguarding and Child Protection Statement
- School's Behaviour Policy
- Staff Code of Conduct
- MAT Safer Recruitment Policy
- MAT Data Protection Policy
- MAT Whistleblowing Policy
- School Anti-Bullying Policy
- MAT Suspension and Permanent Exclusion Policy
- MAT Online Safety Policy
- Parent and pupil privacy notice
- Records Management Policy
- MST AI Policy

Appendix 8 WIDER SAFEGUARDING CONCERNS

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school. The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. At least three emergency contact details will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data. Any safeguarding information will be transferred via CPOMS automatic, firstly the DSL will ensure the information is correct.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Alternative provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. This includes but is not limited to:

- Assuring themselves of attendance reporting procedures
- Accurate information sharing
- Quality Assurance visits
- Referring to the Local Authority's directory of Alternative Provision
- Checking whether a provider is Ofsted registered

Attendance

Attendance is an essential part of safeguarding our students. Please see our 'attendance policy' for full details.

Building children's resilience

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Channel programme

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service will be used where a vulnerable pupil is at risk of being involved in terrorist activities.

In cases where the school believes a pupil is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

Child abduction and community safety incidents

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

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

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

Children absent from education

Under section 175 of the Education Act 2002 we have a duty to investigate any unexplainable and/or persistent absences from education as a child absent from education is a potential indicator of abuse or neglect.

We follow Local Authority procedures for dealing with children that go missing from lessons and/or school, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

We also ensure that we are rigorous in our attendance procedures. Where a child's destination is unknown when they have left our school we ensure we carry out all necessary checks and refer them as CME using the appropriate form so that they can be followed up on. Staff are aware of the trafficking of children and the importance of rigour around our attendance procedures to reduce this as a threat to our children's safety.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an

online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with medical conditions

A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk. Further information can be found in the school's Allergy Safety Policy.

Contextual safeguarding

Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputies, will always consider the context of incidents, this is known as contextual safeguarding.

Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

County lines criminal activity

County lines criminal activity refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis. Indicators that a pupil may be involved in county lines activity include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- **Carrying** weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

Cyber-crime

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

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

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

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, and ability to learn.

The police must notify a child’s education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

The school has at least one leader registered to receive Operation Encompass Alerts from the Police.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

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

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

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

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

Homelessness

The DSL and deputies will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include the following:

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

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

For 16- and 17-year-olds, homelessness may not be family-based and referrals to children's services will be made as necessary where concerns are raised.

Local Authorities must notify schools when a child is placed into temporary accommodation. Where this happens, or where a school believes that a child may be in temporary accommodation, the school will exercise its safeguarding duties.

Homestay exchange visits/ School-arranged homestays in UK

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

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

School-arranged homestays abroad

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

Privately arranged homestays

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

Modern slavery

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

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

Signs of modern slavery may include:

General Indicators – Victims may: (Home Office 2026)	
● Believe that they must work against their will ● Be unable to leave their work environment or home environment ● Show signs that their movements are being controlled ● Feel that they cannot leave ● Show fear or anxiety ● Be subjected to violence or threats of	● Have false identity or travel documents (or none at all) ● Be found in or connected to a type of location likely to be used for exploiting people ● Be unfamiliar with the local language ● Not know their home or work address ● Allow others to speak for them when addressed directly

violence against themselves or against their family members and loved ones • Suffer injuries that appear to be the result of an assault • Suffer injuries or impairments typical of certain jobs or control measures • Suffer injuries that appear to be the result of the application of control measures • Be distrustful of the authorities • Be threatened with being handed over to the authorities • Be afraid of revealing their immigration status • Not be in possession of their passports or other travel or identity documents, as those documents are being held by someone else • Come from a place known to be a source of human trafficking • Have had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services in the destination	• Act as if they were instructed by someone else • Be forced, threatened or deceived into working in poor conditions • Be disciplined through punishment • Be unable to negotiate working conditions • Receive little or no payment • Have no access to their earnings • Work excessively long hours over long periods • Not have any days off • Live in poor or substandard accommodations • Have no access to medical care • Have limited or no social interaction • Have limited contact with their families or with people outside of their immediate environment • Be unable to communicate freely with others • Be under the perception that they are bonded by debt • Be in a situation of dependence • Have acted on the basis of false promises
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The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”.

The Prevent duty will form part of the school’s wider safeguarding obligations.

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

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 the [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 exploitation
- 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 social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Private Fostering

We recognise that our school has a mandatory duty to report to the Local Authority when we become aware of, or suspect that, a child is subject to a private fostering arrangement. To aide our

awareness we ensure that we establish parental responsibility for each and every child; we take steps to verify the relationship of the adults to the child when we register them.

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

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

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

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

Where a member of staff becomes aware of private fostering arrangements they are aware that they need to notify the Designated Safeguarding Lead. The Designated Safeguarding Lead will then speak to the family of the child involved to check that they are aware of their duty to inform Children's Services.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary.

They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Resources

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

Serious violence

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

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

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

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

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

Sexting and the sharing of indecent images

The school will ensure that staff are aware to treat the sharing of indecent images, including through sexting, as a safeguarding concern.

When a member of staff becomes aware of an incident of sexting that involves indecent images of a pupil, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.

- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Discuss this decision with the headteacher or member of the SLT.
- Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
- Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made to view the imagery in accordance with the Records Management Policy.

Where the incident is categorised as ‘aggravated’, the situation will be managed in line with the school’s Child-on-child abuse (including harassment and violence) procedures. Where the incident is categorised as ‘experimental’, the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident.

Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSCS. Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person’s clothing without consent and with the intention of observing, or enabling another person to observe, the victim’s genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

A “specified purpose” is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim’s genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

“Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion activated camera.

Upskirting will not be tolerated by the school.

Any incidents of upskirting will be reported to the DSL who will then decide on the next steps to take, which may include police involvement.

Use of the school premises for non-school activities

Where the school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

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

Young Carers

The school will be alert to the needs of young carers, recognising that caring responsibilities can impact on attendance, attainment, behaviour and wellbeing. Young carers will be identified and monitored so that they receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Appendix 9 CONTACTS AND ADVICE

Expert organisations

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

Support for victims

- [Anti-Bullying Alliance](#)
- [MoJ Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

Toolkits

- [Brook](#)
- [Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#)

Further information on confidentiality and information sharing

- [Gillick Competency Fraser Guidelines](#)
- [Government Information Sharing Advice](#)
- [NSPCC: Things to Know and Consider](#)

Further information on sexting

- [UK Council for Child Internet Safety: Sexting Advice](#)

- [London Grid for Learning – Collection of Advice](#)

Support for parents

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)