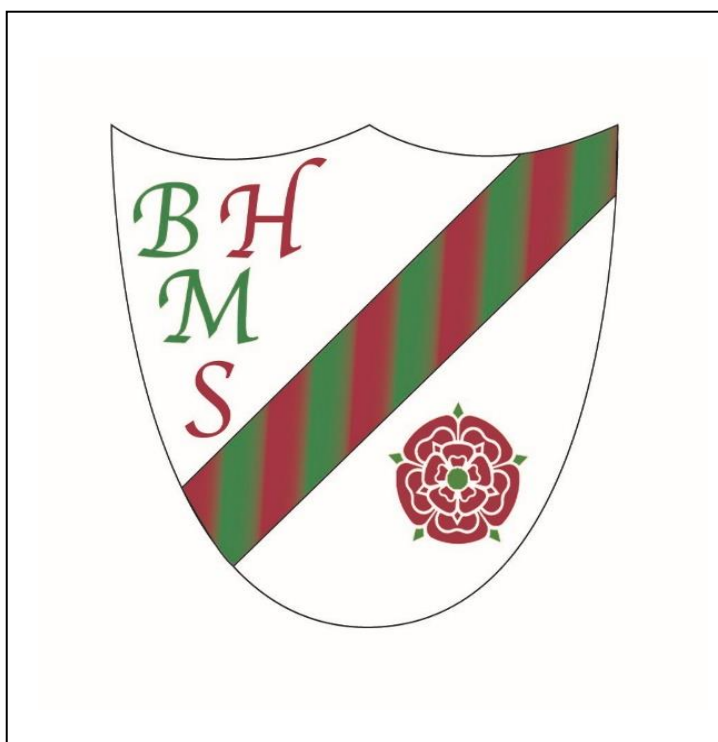


Bedford Hall Methodist Primary School

Child Protection and Safeguarding Policy



Reviewed by:	A Burkes, Director of Education
Personalised for school by:	Lisa Draper
Approved by Trustee Board:	6 th September 2023
Approved by LAB:	Autumn 2024
Next Review Date:	Autumn 2025

Mission Statement

Bedford Hall Methodist Primary School strives to provide a caring environment in which every individual can achieve his or her full potential.

To achieve this we wish to create a happy secure and purposeful atmosphere throughout the school, which is conducive to learning and high standards, and is based on Christian values.

Safeguarding Statement

At Bedford Hall Methodist Primary School, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We work to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in the Safeguarding Policy apply to all staff, volunteers and governors

Vision



Version Control

Change Record

Date	Author	Version	Section	Reason for Change
September 2022	Amy Burkes	1		Trust Policy created
24.7.2023	Amy Burkes	2	p.9 p.16 p.21 p.25 p.33 p.39 Appendix D	Updated in line with KCSIE 2023 Responding to concerns Early Help updated Filtering and monitoring Visitors to school Addition of Glossary of terminology Children who are absent from Education Signs of Child Abuse and Neglect
September 2023	Lisa Draper			Personalised for school – names and responsibilities
08.08.24	Amy Burkes	3	p.3 p.6 p.7 p.12 p.14 p.15 p.17 p.17 & 18 p.20 p.26 P.27 p.30 p.36 – 41 p.53 p.53	Updated in line with KCSIE 2024 and Working Together to Safeguard Children 2023. Updated wording throughout policy to replace the phrase 'abuse and neglect' to 'abuse, neglect and exploitation.' Include SENDCo's name Updated 'definition' in line with KCSIE 2024 and Working Together to Safeguard Children 2023 Update legal framework Role of LAB – link to unexplained or persistent absence DSL – good understanding of behaviours which impact engagement and learning and harmful behaviours. Keeping records of concerns, discussions and decisions made, including rationale for these decisions. Updated definition for 'abuse.' Updated Early Help section – in line with guidance from Working Together to Safeguard Children 2023. Added definition for 'Exploitation' 'Children who are lesbian, gay, bisexual or gender questioning' <i>UNDER REVIEW</i> Alternative Provision – school continue to be responsible for safeguarding pupil New – Low Level Concerns section Glossary definitions updated – different types of exploitation, Kinship care, abuse, Terrorism Update 'Prevent' section Update 'children and the court system'
September 2024	Lisa Draper		P5 P10	New LADO Addition of Wigan's consultation line

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Statement of intent

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

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

- Ensuring that members of the trustee board, the local advisory board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, neglect and exploitation 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.

Safeguarding contact details:

Governors' Committee Responsible: Safeguarding Committee

Governor Lead: Kevin Meredith

Trust Designated Lead: Amy Burkes

Trustee Designated Lead: Charlotte Taylor

Nominated Designated Safeguarding Lead: Lisa Draper

Deputy Designated Safeguarding Lead: Michelle Anderton, Lisa Edwards

Nominated Designated Members of Staff: Karen Aspinall, Rebecca Handley

Inclusion Manager / SENDCo: Kate Whalley

Local Authority Designated Officer (LADO): Heather Martin

LADO telephone number: 01942 486042

LADO out of normal office hours telephone number: 07500 063057

LADO Email: lado@wigan.gov.uk

Acronyms

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

Acronym	Long form	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 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 in school 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.
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.
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.
CLA	Child looked after	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.
LLC	Low Level Concern	Concerns raised to the DSL that do not meet the LADO Threshold.
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.
RSHE	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.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
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.

1. Definition

1.1. Safeguarding and promoting the welfare of children **as defined in Keeping Children Safe in Education (2024), means:**

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

2. Legal framework

2.1. This policy has been developed in accordance with the principles established by

- The Children Act 1989 (as amended).
- The Children and Social Work Act 2017.
- The Safeguarding Vulnerable Groups Act 2006.

2.2. In addition to the revised documents:

- **Working Together to Safeguard Children (2023)**
- **Keeping Children Safe in Education (September 2024)**

2.3. Other key documents are noted, which have prompted changes to safeguarding requirements over time. This policy references these throughout where relevant:

- GDPR and the Data Protection Act 2018.
- Information Sharing: Advice for Practitioners 2018.
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (guidance document) 2021.

- Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.
- Statutory framework for the Early years foundation stage for group and school based providers (DfE 2024)
- Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024)
- Childcare Act 2006 (as amended in 2018).
- The Human Rights Act 1998.
- The Equality Act 2010.
- 'Information sharing advice for safeguarding practitioners' DfE (May 2024).

2.4. The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates pupil health and safety; school behaviour and preventing bullying; supporting pupils with medical conditions; personal, health, social economic education; providing first aid and site security.

2.5. This policy operates in conjunction with the following school policies relevant to the safety and welfare of our pupils:

- Attendance Policy
- Acceptable user of IT
- Allegations of Abuse Against Staff Policy
- Anti-bullying Policy
- Child on Child Abuse Policy
- Children Missing Education Policy
- CLA and PLAC Policy
- Complaints Policy
- CPOMs Policy
- Data and Cyber-security Breach Prevention and Management Plan
- Data Protection Policy
- Exclusion Policy
- Equality Policy
- Health and Safety Policy
- Intimate Care Policy
- Mobile Phone Policy
- Online Safety Policy
- Photography Policy
- Positive Behaviour Policy
- Recruitment Policy
- Safer Recruitment Policy
- SEND Policy
- Staff Code of Conduct
- Supporting children with medical conditions policy
- Whistleblowing Policy

2.6. This policy should be read in conjunction with Wigan Council's Threshold of Need document and Wigan Council's Escalation Policy, in addition to the Greater

Manchester policies for 'working with adults and children/young people vulnerable to messages of violent extremism' and 'Child Sexual Exploitation.' All appropriate policies can be found here www.wigan.gov.uk/WSCB/index.aspx

2.7. The aim of this policy is to ensure:

- All of our students are safe and protected from harm
- Safeguarding procedures are in place to help children and young people to feel safe and learn to stay safe
- Adults in the education setting community are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection.
- All agencies are providing appropriate support to children and young people through adoption of the early help framework

3. Roles and responsibilities

3.1. Under the Education (Independent School Standards) Regulations 2014, the Epworth Education Trust (the proprietor) will ensure arrangements for safeguarding and promoting the health, safety and welfare of all its pupils – having regard to any guidance made for all its schools and settings.

3.2. All staff have a responsibility to:

- Follow all statutory guidance
- Consider, at all times, what is in the best interests of the pupil.
- Be aware of the categories of abuse listed in KCSIE 2024 Part 1, which include:
 - Physical abuse.
 - Emotional abuse.
 - Sexual abuse.
 - Domestic abuse.
 - Neglect.
 - Bullying.
 - Child Criminal Exploitation (CCE)
 - Radicalisation.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding Be aware of the school's systems which support safeguarding (CPOMs, Senso, Sophos), including any policies, procedures, information and training provided upon, and beyond, induction.
- Be aware of the role and identity of the DSL and deputy DSLs. This is displayed on the school website, in the staffroom and other key areas around school.
- Undertake safeguarding training, including online safety and Prevent training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it. i.e., providing help and support to meet the needs of children as soon as problems emerge.

- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Read this policy in conjunction with KCSIE 2024 and Working Together to Safeguard Children 2023.

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115271/Keeping-children-safe-in-education-2024.pdf)

[Working Together to Safeguard Children 2023](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115271/Working-Together-to-Safeguard-Children-2023.pdf)

3.3. Responding to concerns / disclosures of abuse

3.4. Staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

3.5. DO:

- **Create a safe environment by offering** the child a private and safe place if possible.
- **Stay calm** and reassure the child and stress that he/she is not to blame.
- **Tell** the child that you know how difficult it must have been to confide in you.
- **Listen carefully** and **tell** the child what you are going to do next.
- Use the **'tell me', 'explain', 'describe'** and/or mirroring strategy.
- **Tell only the Designated or Deputy Safeguarding Lead.**
- **Record** in detail using the Welfare Concern Record (CPOMs) without delay, using the child's own words where possible.

3.6. DON'T:

- Take photographs of any injuries.
- Postpone or delay the opportunity for the pupil to talk.
- Take notes while the pupil is speaking or ask the pupil to write an account.
- Try to investigate the allegation yourself.
- Promise confidentiality, e.g. Say you will keep 'the secret'.
- Approach or inform the alleged abuser.

3.7. All staff record any concern about or disclosure by a pupil of abuse or neglect and report this to the D/DSL **immediately**. It is the responsibility of each adult in the school to ensure that the D/DSL receives the record of concern without delay.

3.8. Teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

3.9. The **Local Advisory Board** has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation and local guidance at all times.
- Evaluate and approve recommendations/action plans identified through quality assurance activity that the DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher to account.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children 2023'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training (which is to be renewed every 3 years)
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.

- Appoint a designated teacher to promote the educational achievement of CLA and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head (VSH) to discuss how the pupil premium funding can best be used to support CLA.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep CLA safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who have '**unexplained and or persistent absences from education,**' to understand the causes of children missing education to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

3.10. The headteacher has a duty to:

- Ensure that the policies and procedures adopted by the local advisory board, particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.
- Ensure all volunteers and visitors are aware of who the DSL is and the procedures to follow via signage in staffroom on the safeguarding board, posters around school displaying DSL's and information around DSL's. Ensure this safeguarding information is on the school website which is easily accessible to parent/carers.

3.11. The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems which are in place. In line with DfE guidance: [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges – Guidance](#).
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. In exceptional circumstances, where the DSL or DDSLs

are not available on site, the DSL can be contacted via phone, video call, or other media.

- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
 - To CSCS where abuse, neglect and exploitation are suspected, and support staff who make referrals to CSCS.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Assist the Headteacher to review and respond to low-level concerns that may arise regarding staff
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety, understanding the filtering and monitoring processes in place.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Ensuring that any child or pupil currently with a child protection plan who is absent in the educational setting without explanation for maximum of two days is referred to their key workers Social Care Team.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.

- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the local advisory board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Ensure all staff receive update training on at least an annual basis (statutorily every 3 years).
- Undergo training, and update this training at least every two years.
- Ensure all staff have appropriate access to CPOMs so all incidents can be recorded and staff are nominated to ensure incident is monitored and any actions carried out.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children.
- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.
- Providing, with the Headteacher, a termly report to the Local Advisory Board (LAB), detailing any changes to policy and procedures; training undertaken by the DSL, and by all staff and the LAB; number and type of incidents and cases, and a number of children on the child protection register (anonymised).

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

4. Multi-agency working

- 4.1. The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.
- 4.2. The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.
- 4.3. 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 multi-agency plans to provide additional support.
- 4.4. 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.
- 4.5. The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

5. Information sharing

- 5.11. We recognise that all matters relating to child protection are confidential¹ and information is handled in line with the education settings. The setting will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance '[Information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers DfE 2024](#).' This guidance has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.
- 5.12. The Guidance that includes 7 'Golden Rules' of Information Sharing in safeguarding. The Government guidance (described by the NSPCC, 2018) is:
1. **Remember that the General Data Protection Regulation (GDPR) Data Protection Act 2018 and human rights law are not barriers** to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
 2. **Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
 3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
 4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.

5. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
 6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
 7. **Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.
- 5.13. All staff must be aware that they have a professional responsibility to share information in order to safeguard children and cannot assume that someone else will pass on the information.
 - 5.14. Sharing of information will be necessary for the purpose for which it's being shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely
 - 5.15. Key organisations who have a duty under section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:
 - The local authority;
 - NHS England;
 - Integrated Care Systems;
 - NHS Trusts, NHS Foundation Trusts;
 - The local policing body;
 - British Transport Police Authority;
 - Prisons;
 - National Probation Service and Community Rehabilitation Companies;4
 - Youth offending teams; and
 - Bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of section 74 of the Education and Skills Act 2008.
 - 5.16. We will always undertake to share our intention to refer a child or young person to Social Care with their parent's / carers unless to do so could put the child or young person at greater risk of harm or impede a criminal investigation.
 - 5.17. In line with Keeping Children Safe in Education 2024, as well as keeping records of concerns, discussions and decisions, designated safeguarding leads will keep a record of the rationale for any decisions made. These recordings include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

6. Operation Encompass

- 6.1. As part of the school's commitment to keeping children safe, the school has signed up to implement the principles and aims of the Encompass model. The purpose of the Encompass model is to safeguard and support children and young people who have been involved in or a witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional distress of parent. Encompass has been created to address

this situation. In KCSIE 2024 the definition of 'abuse' clarifies that harm can include children witnessing the ill-treatment of others and that this is particularly relevant where children **see, hear or experience** domestic abuse and its effects.

- 6.2. Encompass is the implementation of key local partnership working between police and schools. The aim of sharing information with local schools is to allow key adults (DSLs) the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment.
- 6.3. Following the report of an incident of domestic abuse, by 9.00am on the next school day, the school's key adult will be informed that the child or young person has been involved in a domestic incident. This knowledge, given to schools through Operation Encompass, allows the provision of immediate early intervention through silent or overt support dependent upon the needs and wishes of the child.
- 6.4. The purpose and procedures of Operation encompass have been shared with all parents and governors and is detailed as part of this safeguarding policy and published on the school website.

7. Early Help

- 7.1. The education setting will consider the need for an Early Help assessment when it is identified that there are low level concerns or emerging needs. Detailed information on Early Help can be found in Chapter 1 of Working Together to Safeguard Children. Professionals should be alert to the need for early help for a child who:

- is disabled
- 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, home or care
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised
- 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 themselves
- is suffering from mental ill health
- has returned home to their family from care
- 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 fulltime education
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.

(p.124, *Working Together to Safeguard Children 2023*)

- 7.2. It is the responsibility of the education setting to initiate Early Help to identify what the family's strengths and needs are. This will inform whether the setting can support the family or whether a referral to another agency is needed. This process provides a way of recording support and interventions that have been provided by the school to the child / young person and also supports a referral for additional support that may be needed from more targeted services where a single agency has been unable to meet that need. A team around the child meeting (TAC) can be arranged to ensure that a multi-agency action plan can be developed. It is important that the child and parents voice is captured as part of this assessment and that they take ownership of the plan. This plan should be regularly reviewed up to 4 to 6 weeks until outcomes are achieved.
- 7.3. If at any point during the EH process, the risk increases and the education setting becomes concerned that the child or young person is, or is likely to suffer significant harm, then a referral will be made to children's social care.
- 7.4. In all cases the educational setting will consider the statutory guidance for schools and colleges, Keeping Children Safe in Education (2024) with particular reference to Part 1: Information for all schools and colleges.
- 7.5. Our school will support all children and young people by:
- Encouraging self-esteem and self-assertiveness through the curriculum, as well as our relationships, whilst not condoning aggression or bullying.
 - Healthy relationships
 - Promoting a caring, safe and positive environment within the school.
 - Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
 - Notifying Social Care as soon as there is a significant concern.
 - Providing continuing support to a child or young person, about whom there have been concerns, who leaves the school by ensuring that appropriate information is copied under confidential cover to the pupils new setting and ensuring the school medical records are forwarded as a matter of priority.
- 7.6. If at any point the school becomes concerned that a child or young person is at serious risk of harm they should respond appropriately. If the school is concerned that a child is at **immediate** or **imminent** risk, then they should contact the police on either 111 or 999. If however the school is concerned that a child is, or is likely to suffer serious harm but it is not imminent they should call their local authority Social Care Referral Team on **01942 828300**, or the consultation number on **01942 828135** where advice can be sought.

8. Abuse, neglect and exploitation

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

offline abuse. Children may be abused by one or multiple adults or other children.

- 8.2.** For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.
- 8.3.** For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.
- 8.4.** For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.
- 8.5.** For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 8.6.** For the purpose of this policy, “**exploitation**” is when someone uses a child for financial gain, sexual gratification, labour or personal advantage. Using cruel and violent treatment to force a child to take part in criminal or sexual activities often leads to physical and emotional harm to the child, to the detriment of their physical and mental health, education, and moral or social development. “The exploitation of children can take a number of different forms and perpetrators may subject children

and young people to multiple forms of abuse at the same time, such as criminal exploitation (including county lines) and sexual exploitation.” (The Home Office, 2022).

- 8.7.** All staff will be aware of the indicators of abuse, neglect and exploitation and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.
- 8.8.** All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images (including AI generated images).

9. Specific safeguarding issues

- 9.1.** There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.
- 9.2.** Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

10. Child-on-child abuse

- 10.1.** For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children.
- 10.2.** The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s statement of intent.
- 10.3.** All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.
- 10.4.** All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as “banter” or “part of growing up”.
- 10.5.** Child-on-child abuse can be manifested in many different ways, it is likely to include, but not limited to:
- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
 - Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.

- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

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

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

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

11. Online safety and personal electronic devices

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

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

11.3. 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.

11.4. The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the school’s Data and Cyber-security Breach Prevention and Management Plan. The school will, however, ensure that the use of filtering and monitoring systems does not cause “over blocking”, which may lead to unreasonable restrictions as to what pupils can be taught online.

11.5. Staff should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring and will know how to escalate concerns where they are identified (KCSIE 2024). The Headteacher / designated safeguarding lead should take responsibility for understanding the filtering and monitoring systems and processes in place, using guidance from the DfE’s new filtering and monitoring standards (DfE, 2024), which supports schools to have effective systems in place.

- 11.6. Bedford Hall Methodist Primary School uses SOPHOS to filter content that can be viewed on pupil and staff technological devices and school networks. This is updated regularly to respond to new language, sites and apps. Technology use is monitored through SENSO. Michelle Anderton, Pastoral Manager, monitors (via SENSO) pupil use and Lisa Draper, headteacher, monitors (via SENSO) adult use.
- 11.7. Further information regarding the school's approach to online safety can be found in the Online Safety Policy.
- 11.8. **Communicating with parents**
- 11.9. As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.
- 11.10. The school will also make it clear to parents what their children are being asked to do online for school.
- 11.11. **Reviewing online safety**
- 11.12. 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.
- 11.13. **Personal electronic devices**
- 11.14. 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 ICT Acceptable Usage Policy and Mobile Phone Policy.
- 11.15. Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. All photographs and videos of pupils will be taken on Trust / school owned devices **only**. Use of personal devices for this purpose is not permitted.
- 11.16. 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.
- 11.17. Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.
- 11.18. **Upskirting**
- 11.19. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "**Operating equipment**" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.
- 11.20. 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.

12. Consensual and non-consensual sharing of indecent images and videos

- 12.1. The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern. The DSL will

refer to DfE guidance: [‘Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\)’](#).

- 12.2.** Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.
- 12.3.** Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.
- 12.4.** Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. 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, copying, printing, sharing, storing or saving the imagery. A verbal description should be taken and recorded on CPOMS.
 - 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.
- 12.5.** 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.
- 12.6.** For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:
- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts, e.g. the contents of the imagery, from the pupil(s) involved.
 - Necessary to report it to a website, app or suitable reporting agency to have the image taken down, or to support the pupil or their parent in making a report.
 - Unavoidable because the pupil has presented the image directly to a staff member or the image has been found on a school device or your school’s network.

- 12.7.** 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:
- Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
 - Discuss the decision with the headteacher or a member of the SLT.
 - Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the SLT.
 - Make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the SLT. This staff member does not need to view the images.
 - Wherever possible, make sure viewing takes place on the school premises, ideally in the headteacher's office or a member of the SLT's office.
 - Make sure, wherever possible, that they are viewed by a staff member of the same sex as the pupil in the images.
 - Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.
- 12.8.** Where the incident is categorised as 'aggravated', the situation will be managed in line with the school's Child-on-Child Abuse Policy. 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.

13. Context of safeguarding incidents

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

14. Pupils potentially at greater risk of harm

- 14.11.** The school recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.
- 14.12. Pupils who need social workers**
- 14.13.** Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.
- 14.14.** As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

- 14.15.** Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.
- 14.16. Home-educated children**
- 14.17.** 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.
- 14.18.** 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.
- 14.19.** 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.
- 14.20. CLA and PLAC**
- 14.21.** Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.
- 14.22.** The local advisory board will ensure that staff have the skills, knowledge and understanding to keep CLA and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:
- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
 - Contact arrangements with parents or those with parental responsibility.
 - Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.
- 14.23.** The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.
- 14.24.** Further details of safeguarding procedures for CLA and PLAC are outlined in the school's CLA Policy.
- 14.25. Pupils with SEND**
- 14.26.** When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
 - Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
 - Communication barriers may exist, as well as difficulties in overcoming these barriers
- 14.27.** When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENDCO / Inclusion Manager, as well as the pupil's parents where appropriate, to ensure that

the pupil's needs are met effectively.

14.28. Pupils who are Lesbian, gay, bisexual or gender questioning (under review)

14.29. The fact that a pupil may be Lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm; however, staff will be aware that these pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be Lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as pupils who identify as Lesbian, gay, bisexual or gender questioning.

14.30. Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

14.21. Pupils requiring mental health support

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

15. Use of the school premises for non-school activities

15.1. The Local Advisory Board, along with the school's senior leadership team, are responsible for satisfying themselves and obtaining written assurances from any relevant school lettings and alternative/off site providers and provisions that their safeguarding arrangements are secure, in keeping with the requirements set out in KCSIE 2024.

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

15.3. Where provided activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The 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.

15.4. If school receive an allegation relating to an incident during the letting period, school will follow their safeguarding policies and procedures as standard, including informing the LADO (KCSIE 2024).

15.5. Extracurricular activities and clubs

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

15.7. 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.

- 15.8.** 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.

16. Visitors to school

- 16.1.** All visitors to school sign in / out of school using the school's visitor management system, wear a school ID badge. A coloured lanyard will indicate whether the visitor is DBS checked (green) or not (red) to indicate whether they should be accompanied. All visitors are provided with safeguarding information including the contact details of safeguarding DSLs.
- 16.2.** Visitors of a professional role are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at the education setting. Supporting Letters in relation to DBS checks of visitors holding professional ID badges should be provided to school from the local authority.
- 16.3.** Community users organising activities for children are aware of the school's child protection guidelines and procedures.

17. Alternative provision

- 17.1.** The school will remain responsible for the welfare and safeguarding of a pupil during their time at an alternative provider and should be satisfied that the placement meets the pupil's needs. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. This includes ensuring that the provision has effective safeguarding policy/procedures/training in place for all staff. The provision follows safer recruitment processes and have clear allegation management processes.
- 17.2.** Pupils who attend alternative provisions can often have complex needs and it is important that the school is aware of the additional risk of harm that pupil may be vulnerable to. Therefore, appropriate risk assessments/support plans and communication channels are in place where a pupil accesses provision offsite.

18. Work experience

- 18.1.** When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

19. Homestay exchange visits

19.1. School-arranged homestays in UK

- 19.2.** 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.
- 19.3.** 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.

19.4. School-arranged homestays abroad

19.5. 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.

19.6. Privately arranged homestays

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

19.8. Private fostering

19.9. Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

20. Concerns about pupils

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

20.2. Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

20.3. All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the communication and confidentiality section of this policy.

20.4. Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

20.5. The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. 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.

20.6. 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 and kept securely on CPOMS and the Early Help Portal.

- 20.7.** 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.
- 20.8.** 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.
- 20.9.** An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

21. Managing referrals

- 21.1.** The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart will be followed accordingly.
- 21.2.** 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.
- 21.3.** 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.
- 21.4.** 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.
- 21.5.** 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.
- 21.6.** 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 the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

22. Concerns about school safeguarding practices

- 22.1.** If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the Headteacher. If the concern is with regards to the headteacher, it will be referred to the Chair of Governors.
- 22.2.** Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

23. Safeguarding concerns and allegations of abuse against staff

- 23.1.** All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Trust's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.
- 23.2.** When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:
- Behaved in a way that has harmed a child or may have harmed a child.
 - Committed or possibly committed a criminal offence against or related to a child.
 - Behaved towards a child in a way that indicates they may pose a risk of harm to children.
 - Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

24. Concerns that do not meet the harm-threshold – Low Level Concerns (LLC)

- 24.1.** The school and Trust have established relevant processes and procedures for addressing concerns that do not meet the threshold for referral to the Local Authority Designated Officer (LADO). These concerns are classified as low-level concerns. The term "low-level" does not diminish the seriousness of such concerns; rather, it indicates that they fall below the LADO threshold but still warrant careful consideration through a safeguarding lens and appropriate action via the school's internal procedures. It is crucial to manage these concerns rigorously, as a pattern of repeated low-level concerns, although individually not meeting the LADO threshold, may collectively raise questions about an individual's suitability and potential risk to children within their professional capacity.
- 24.2.** At Bedford Hall Methodist Primary School, the leadership team manages low-level concerns (LLC) in accordance with the school's internal procedures. If it has verified that a member of staff has breached the Staff code of conduct, depending on the severity and impact on a child, the school will also engage with the Trust's Human Resources (HR) team to:
- Ensure staff understand what constitutes appropriate behaviour and can distinguish between expected and inappropriate behaviour in themselves and others.

- Empower staff to report any low-level safeguarding concerns.
 - Address unprofessional behaviour promptly, providing support to correct it at an early stage.
 - Offer a responsive, sensitive, and proportionate response to such concerns when they are raised.
 - Identify any weaknesses within the school's safeguarding system.
- 24.3.** The school's approach to managing low-level concerns reflects and extends the guidance provided in the staff behaviour guidelines, the code of conduct, and the Allegations of Abuse Against Staff Policy.
- 24.4.** Concerns may arise from various sources, such as suspicions, complaints, safeguarding concerns, allegations from other staff members, disclosures made by a child, parent, or external party, or pre-employment vetting checks. All staff should be aware that, in line with the school's culture, they are encouraged to trust and have confidence in the leadership when expressing concerns about adults working or volunteering with children.
- 24.5.** The school handles information responsibly, sharing it on a need-to-know basis, and adheres to protocols for recording and storing information confidentially. The school fosters an open and transparent culture to identify concerning, problematic, or inappropriate behaviour early, thereby minimising the risk of abuse. It also ensures that all adults working in or on behalf of the school clearly understand professional boundaries and act in accordance with the ethos and values of the school and the Trust.
- 24.6.** The principles and practices for managing low-level concerns follow the protocol outlined in the Allegations of Abuse Against Staff Policy. If there is uncertainty about whether a concern meets the threshold for LADO referral or qualifies as a low-level concern, the school should consult with the Trust HR team and the LADO.

25. Communication and confidentiality

- 25.1.** All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.
- 25.2.** Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.
- 25.3.** Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.
- 25.4.** 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.

- 25.5. Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.
- 25.6. 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.
- 25.7. 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.
- 25.8. In line with KSCIE 2024, it is recommended that education professionals read the [DfE Data Protection guidance for schools \(DfE, 2024\)](#). This guidance is aimed at school staff, governors and trustees and sets out how to: comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches.

26. Safer recruitment

- 26.1. The school's full policy and procedures for safer recruitment are outlined in the Recruitment Policy.
- 26.2. 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, they:
- Are responsible on a daily basis for the care or supervision of children.
 - Regularly work in the school at times when children are on the premises.
 - Regularly come into contact with children under 18 years of age.
- 26.3. The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.
- 26.4. The school will inform shortlisted candidates that online searches may be done as part of pre-recruitment / due diligence checks. (KCSIE 2024).
- 26.5. 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.
- 26.6. The appropriate DBS and suitability checks will be carried out for all Trustees and Local Advisory Board members, volunteers, and contractors.
- 26.7. **Staff suitability**
- 26.8. All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

26.9. All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

26.10. Ongoing suitability

26.11. 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.

26.12. Referral to the DBS

26.13. The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

27. Single central record (SCR)

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

27.2. All members of the proprietor body (Trustee Board) are also recorded on the SCR.

27.3. The following information is recorded on the SCR:

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

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

27.5. 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.

27.6. Written confirmation that supply agencies have completed all relevant checks will also be included.

27.7. The school is free to record any other information it deems relevant.

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

28. Training

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

28.2. The induction training will cover:

- The Child Protection and Safeguarding Policy.
- Prevent Training.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE 2024) (or Annex A, if appropriate).
- The Positive Behaviour Policy.
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSLs.

28.3. 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.
- Abuse, neglect and exploitation.
- Contextual safeguarding.
- How to keep CLA and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

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

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

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

- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

29. Monitoring and review

29.1. The school's child protection policy and procedures will be monitored and updated by:

- Local Advisory Board and Trust visits to the education setting
- SLT drop ins and discussions with children, young people and staff
- Pupil / student surveys and questionnaires
- Scrutiny of exclusion and attendance data
- Scrutiny of LAB minutes
- Logs of bullying / racist / sexist behaviour incidents for SLT and LAB to monitor
- Review of parental concerns and parent / carer questionnaires
- Review of the use of intervention strategies such as nurture room.

29.2. The Child Protection and Safeguarding Policy template is reviewed annually by the Trustees which once completed is adopted by the school's Local Advisory Board. 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.

29.3. 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 and as part of safeguarding training and updates.

29.4. The next scheduled review date for this policy is autumn 2025.

30. Glossary

A Child	A person who has not yet reached their 18 th birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. The definition of abuse has been expanded to highlight that witnessing ill-treatment of others is harmful to children in relation to domestic abuse ('including whether they see, hear or experience its effects').
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none"> • repeated • intended to hurt someone either physically or emotionally • often aimed at certain groups, for example because of race, religion, gender or sexual orientation

Child Labour Exploitation	This involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential and dignity.
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation (CSE)	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	SEN – a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability – a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Child-on-child Abuse	Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18.
County Lines	Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
Criminal Exploitation	Child criminal exploitation (CCE): Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: <ul style="list-style-type: none"> • psychological

	<ul style="list-style-type: none"> • physical • sexual • financial • emotional
Early Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.
Elective Home Education (EHE)	When a parent exercise their right to provide their child's education via an alternative to school. This involves the parent working in partnership with the local authority to support the authority meeting their duty to ensure the education is efficient and suitable. In this case the safeguarding duty for the child rests with the parent or guardian. Although safeguarding concerns from schools and professional would continue as with any other case and should follow safeguarding referral routes into the MAST for triage and assessment
Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	Defining a gang is difficult. They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang.

	<p>A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p> <p>An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).</p>
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> • disability • race • religion • transgender identity • sexual orientation.
Homelessness	<p>The definition of homelessness means not having a home. You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head.</p> <p>You count as homeless if you are:</p> <ul style="list-style-type: none"> • staying with friends or family; • staying in a hostel, night shelter or B&B; • squatting (because you have no legal right to stay); • at risk of violence or abuse in your home; • living in poor conditions that affect your health; • living apart from your family because you don't have a place to live together. <p>https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities</p>
Honour-based violence	<p>Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.</p>
Kinship Care	<p>Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. These arrangements can be known as either family and friends care or private fostering.</p> <ul style="list-style-type: none"> - Family and Friends Carers: If you're a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who can't be cared for by their birth parents, you're known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order. - Private Fostering: You're a private foster carer if you're not a close relative and you're looking after a child who's under 16 (or under 18 if they're disabled) for more than 28 days in a row.
Neglect	<p>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</p>

	<p>during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> • Protect a child from physical and emotional harm or danger. • Ensure adequate supervision (including the use of inadequate caregivers). • Ensure access to appropriate medical care or treatment. • It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Modern Slavery	<p>Modern slavery is a serious crime being committed across the UK in which victims are exploited for someone else's gain. It can take many forms including trafficking of people, forced labour and servitude. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.</p>
Physical Abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p>
Private Fostering	<p>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. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.)</p>
Radicalisation & Extremism	<p>Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.</p> <p>Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.</p>
Relationship Abuse	<p>Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.</p>
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> • protecting children from maltreatment; • preventing impairment of children's health or development; • ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and <p>taking action to enable all children to have the best outcomes.</p>
Nudes	<p>Sharing nudes or semi nudes is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages.</p>

	<ul style="list-style-type: none"> • They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages. • Use of artificial intelligence to create and share nudes and semi-nude images.
Sexual Abuse	<p>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.</p> <p>They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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</p>
Sexual harassment	<p>Is a type of harassment involving the use of explicit or implicit sexual overtones, including the unwelcome or inappropriate promise of rewards in exchange for sexual favours. Sexual harassment includes a range of actions from verbal transgressions to sexual abuse or assault</p>
Sexual Violence	<p>Is the general term we use to describe any kind of unwanted sexual act or activity, including rape, sexual assault, sexual abuse, and many others.</p>
Terrorism	<p>Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.</p>
Trafficking	<p>Child trafficking: children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.</p>
Upskirting	<p>Upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm</p>

Appendix A - Specific safeguarding issues

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

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Children missing from education](#)
4. [Child abduction and community safety incidents](#)
5. [Child criminal exploitation \(CCE\)](#)
6. [Cyber-crime](#)
7. [Child sexual exploitation \(CSE\)](#)
8. [Modern slavery](#)
9. [FGM](#)
10. [Virginity testing and hymenoplasty](#)
11. [Forced marriage](#)
12. [Radicalisation](#)
13. [Pupils with family members in prison](#)
14. [Pupils required to give evidence in court](#)
15. [Mental health](#)

16. [Serious violence](#)

Domestic abuse

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

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

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

Homelessness

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

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

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

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

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called ‘honour’-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a

child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures. (Annex B, KCSIE 2024)

Children missing from education

A child going missing from school can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy. 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. Staff report immediately to the DSL, if they know of any child who may be:

- Missing – whereabouts unknown and unable to make contact (as a result of making reasonable enquiries)
- Missing education – (compulsory school age (5-16) with no school place and not electively home educated)

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

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. Two emergency contacts 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.

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.

Child abduction and community safety incidents

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

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

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

Child criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

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

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

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

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

County lines

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

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

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

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

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

Cyber-crime

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

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

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

Child sexual exploitation (CSE)

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

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

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

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

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.

- Regularly missing school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

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

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

Modern slavery

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

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

FGM

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

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

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the

practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

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

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

Indicators that FGM may take place soon include:

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

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

Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

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

Virginity testing and hymenoplasty

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

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if

vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

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

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

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

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

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

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling

- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

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

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

Forced marriage

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

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

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or

the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

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

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

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

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

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

The school will support any victims to seek help by:

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

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

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

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

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

Radicalisation

For the purposes of this policy, “**radicalisation**” is the process of a person legitimising support for, or use of, terrorist violence.

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

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

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

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

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

The Prevent duty

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

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

Effective early help relies on all staff to be vigilant and aware of the nature of the risk for children and young people, and what support may be available. All front-line staff will undertake Prevent awareness training (every 3 years). DSLs and those with a responsibility for Prevent will ensure they attend Prevent training every two years, in particular focussing on local threat and risk and ideology training as outlined in the [Prevent Duty Guidance](#).

Pupils with family members in prison

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

Pupils required to give evidence in court

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

[Primary schools only] Pupils will be provided with the booklet [‘Going to Court’](#) from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

[Secondary schools and post-16 settings only] Pupils will be provided with the booklet [‘Going to Court and being a witness’](#) from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Children and the court system: There are two separate age-appropriate guides (one for 5-11 year olds (HM Courts and Tribunals Service, 2017a) and the other one for 12-17 year olds (HM Courts and Tribunals Service, 2017)) for schools to use to support children in the court system. (Annex B – Page 148).

Mental health

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

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

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

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

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

Serious violence

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

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.

- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

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

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

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

The school will be aware that the Police, Crime, Sentencing and Courts Act have introduced a new duty in 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

Appendix B - Staff Disqualification Declaration

Name of school:	
Name of staff member:	Position:
Orders and other restrictions	
Yes/No	
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
<ul style="list-style-type: none"> • Any offence against or involving a child? 	

• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	

Provision of information

If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.

Details of the order restriction, conviction or caution:

The date(s) of the above:	
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The relevant court(s) or body/bodies:	
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You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.

Declaration

In signing this form, I confirm that the information provided is true to the best of my knowledge and that:

- I understand my responsibilities to safeguard children.
- I understand that I must notify my headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.

Signed:	
Print name:	
Date:	

Appendix C - Safeguarding Reporting Process

The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made

A staff member identifies a concern or potential concern. Is the pupil at immediate risk of harm?

N

Y

Is the DSL or deputy DSL available to discuss the concern with?

The staff member immediately notifies the police of the situation and informs the DSL.

Y

N

The staff member discusses the concern with the DSL. Taking into account observations and using professional judgement, is a referral required?

The staff member makes a referral to CSCS, notifying the DSL of this as soon as possible.

Y

N

The DSL makes a referral to CSCS, keeping the staff member who raised the concern up-to-date with what action is taken.

The pupil continues to be monitored and early help is provided where necessary. If the concern escalates, a referral is made to CSCS.

Within one working day, a social worker from CSCS will make a decision about the type of response that is required and will notify the referrer. Where this information is not forthcoming, the referrer should contact the appointed social worker to follow up the referral.

The steps outlined in the next flowchart are then followed.

After a referral is made

Once a referral has been made, a social worker from CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.

The pupil is in need of immediate protection.

Where the pupil is at risk of significant harm but is not in immediate danger, a strategy discussion is held.

No formal assessment is needed.

Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.

The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.

Appropriate emergency action is taken by the social worker, police or NSPCC.

A Child in Need assessment is completed within 45 working days.

Within 15 working days of the strategy discussion, an initial child protection conference is held.

A child protection plan is potentially required.

The type of support needed is identified, arranged through multi-agency liaison and provided effectively.

Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first.

If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Appendix D – Definition and signs of child abuse. Guidance for professionals who work with children on how to recognise the signs of child abuse (NSPCC)

<https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

Signs of child abuse and neglect

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities including non-contact activities, including online abuse.

Key features

There may be few physical signs and more likely to be emotional and behavioural factors.

- Aggression
- Withdrawn
- Self harming, including eating disorders
- Drawings of sexually explicit behaviours
- Inappropriate sexualised conduct
- Sexually explicit behaviour
- Reluctance to remove clothing for swimming or PE

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience. Studies indicate that over 90% of cases involve a known adult.

Sexual abuse can take place online and technology can be used to facilitate offline abuse.

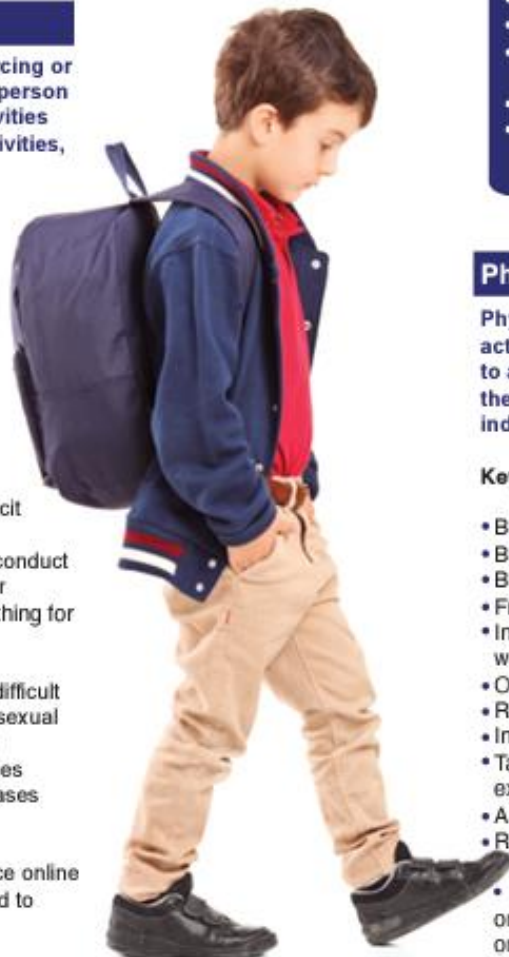
Neglect

Neglect is the failure to meet a child's physical and or psychological needs.

Key features

- Persistently hungry
- Inadequate clothing for the child's size, weather or time of year
- Underweight for age
- Frequent school absences
- Poor health
- Emotionally needy

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High Risk Factors

- Families with complex needs
- Parental substance use
- Poor parental mental health
- Parents with learning difficulties
- Children with disabilities
- Families with past history of childhood abuse

Physical Abuse

Physical abuse involves any action that causes physical harm to a child including fabricating the symptoms of or deliberately inducing illnesses.

Key features

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non- mobile children
- Injuries in unusual areas or with well-defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive
- Arms and legs kept covered
- Reluctance to remove clothing for swimming or PE
- The parents are uninterested or undisturbed by an accident or injury

Further Information

The statutory guidance for schools is set out in the following documents:

Keeping Children Safe in Education (DfE)

Working Together to Safeguard Children (DfE)

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child.

Key features

- Development delay.
- Abnormal attachment to parent/ carer.
- Low self-esteem.
- Lack of confidence.
- Inappropriate emotional response.

To book Safeguarding CPD or a conference keynote, visit our website at: www.safeguardingsinschools.co.uk or email office@safeguarding.info

Appendix E- 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](#)
- [NSPCC](#)
- [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](#)
- [Information Commissioner's Office: Education](#)
- [NSPCC: Things to Know and Consider](#)

Further information on consensual and non-consensual sharing of images and videos

- [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](#)