Safeguarding and Child Protection Policy

V1

Our vision is to enable all to flourish.

Status and review cycle:	Statutory and annual
Responsible group:	The Trust with LGB amendments to setting and ratification.
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To gain immediate guidance from this policy on reporting a concern, please see page 4 for contact information and Page 15 Paragraph 8.7 for the process.

Safeguarding statement

Clearwater Church of England Primary Academy recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued, and their interests are at the heart of all our decisions. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice as soon as problems emerge. Child protection forms part of the school's safeguarding responsibilities. The school will fully contribute to multi-agency working in line with statutory guidance outlined in Keeping Children Safe in Education (KCSIE) and Working Together to Safeguard Children (WTSC).

Safeguarding is everyone's responsibility.

Key Contacts

The designated safeguarding lead (DSL) is: Mr D Walters head@clearwater.dgat.org.uk Telephone: 01452 347690
The deputy DSL(s) is /are: Mrs D Hayward dhayward@clearwater.dgat.org.uk Mrs S Le Templier sletemplier@clearwater.dgat.org.uk Mrs S Jones sjones@clearwater.dgat.org.uk Miss B Nobbs SENCO@clearwater.dgat.org.uk Telephone: 01452 347690
The nominated safeguarding governor is: Mr John De Gruther jdegruyther@clearwater.org.uk Telephone: 01452 347690
The headteacher is: Mr D Walters head@clearwater.dgat.org.uk Telephone: 01452 347690
The chair of governors is: Mrs Sharon Trotman Contact details: email: chair@clearwater.dgat.org.uk Telephone: 01452 347690
Children's Helpdesk (8am-5pm): Telephone: 01452 427070 Out of Hours – Emergency Duty Team Telephone: 01452 614194 or 101 Link to Gloucestershire Safeguarding Children's Executive www.gloucestershire.gov.uk/gcsp
Allegations Management: LADO Telephone: 01452 426 994
If there is an emergency and you feel that a child may be in immediate danger use 999

Terminology

Safeguarding and promoting the welfare of children is defined as:

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

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

The word *staff* refers to all those working for or on behalf of the school, full or part-time, temporary or permanent, either in a paid or voluntary capacity.

The word *practitioners* refers to "all individuals who work with children and their families in any capacity."

Child includes everyone under the age of 18.

Parents refer to birth parents and other adults who are in a legally recognised parenting role, for example step- parents, foster carers, extended family, kindship care, special guardianship and adoptive parents.

For the purposes of this policy, the term *harmful sexual behaviour* includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DFE's guidance contained within KCSIE and for the purpose of this policy, the term *sexual harassment* is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated and can create a hostile, sexualized or offensive environment.

For the purposes of this policy, the term *sexual violence* encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

The *teaching role* is defined as someone who is involved in planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching activities if the person carrying out the activities does so (other than for the purpose of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

1.0 Introduction

1.1 This policy has been created with due regard to all relevant legislation including, but not limited to, the following legislation, statutory and non-statutory guidance:

Legislation

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

Statutory guidance

Keeping Children Safe in Education
Relationships Education, Relationships and Sex Education and Health Education (2025)
Early Years Foundation Stage Statutory Framework
DfE (2026) 'Working Together to Safeguard Children'
Prevent duty guidance (2023) also known as the Prevent duty.
Channel Duty Guidance
Children Missing Education
DfE (2018) 'Disqualification under the Childcare Act 2006
DFE Working together to improve school attendance (2026)
Multi-agency statutory guidance on female genital mutilation
Multi-agency statutory guidance for dealing with forced marriage and Multi agency practice guideline: Handling cases of forced marriage

Non-statutory guidance

DfE (2015) 'What to do if you're worried a child is being abused'
DfE (2024) Meeting digital and technology standards in schools and colleges
DFE (2025) Filtering and monitoring standards for schools and colleges
DfE (2017) 'Child sexual exploitation'
DfE (2024) 'Information sharing'

DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
DfE (2021) 'Teachers' Standards'
DfE (2024) 'Recruit teachers from overseas'
DfE (2024) 'Working together to improve school attendance'
Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
Restrictive intervention including the use of reasonable force in schools'
Children Missing Education

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

1.3 This policy applies to all members of staff, volunteers, visitors, and governors in the school.

2.0 Policy Principles

2.1 The welfare of the child is paramount, whether they are in school or at home.

2.2 All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

2.3 We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.

2.4 All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

2.5 We are committed to anti-racist and anti-discriminatory safeguarding practice. We recognise that racism, bias and discrimination—whether conscious or unconscious—can affect how safeguarding concerns are identified, assessed and responded to, and may create barriers to children receiving timely and effective protection. We acknowledge that children's lived experiences, including how they experience safety, risk and support, may be shaped by discrimination linked to race, ethnicity, culture, disability, gender, religion or other protected characteristics.

2.6 Pupils and staff involved in child protection issues will receive appropriate support.

3.0 Policy Aims

3.1 To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners and to provide a framework within which this is done. This policy operates for pupils attending school in person and for when they are required to learn remotely or in other settings such as Alternative Provision.

3.2 To support the child's development in ways that will foster security, confidence and independence.

3.3 To provide an environment in which all our children and young people feel safe, secure, valued and respected, and feel confident to, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.

3.4 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

3.5 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.

3.6 To emphasise the need for good levels of communication between all members of staff.

3.7 To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.

3.8 To ensure effective working relationships with other agencies, especially the Police and Social Care are in place.

3.9 To ensure that all staff working within our school, who have substantial access to children, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a single central record is maintained accurately and checked regularly.

4.0 Supporting Children

4.1 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We also recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of

school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or a single label. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise any 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 be 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.

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.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal through to being aggressive or withdrawn.

Our school will support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Responding sympathetically to any requests for time out to deal with distress and anxiety.
- Offering details of helplines, counselling or other avenues of external support.
- 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 who leaves the school, about whom there have been concerns, by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority. If a child leaves the school to be educated at home, the school will work with other key professionals to coordinate a meeting with parents and carers where possible. Ideally this will be in advance of a final decision to remove is made.
- Children are taught to understand and manage risk through PSHE and Relationship and Sex Education and through all aspects of school life. This includes online safety. This is delivered using materials from Jigsaw.

4.2 Prevention/Protection - we recognise that school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The school community will therefore:

- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g., through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes etc.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including through PSHE and RSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. This will include anti-bullying work, online safety, road safety, pedestrian and cycle training. Also focused work on Year 6 to prepare for transition to secondary settings and more personal safety/independent travel.
- Ensure all staff are aware of the latest guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

5.0 Safe School, Safe Staff

5.1 We will ensure that:

- All staff receive annual information about the Trust and school's safeguarding arrangements as follows - the school's safeguarding and child protection policy, staff behaviour policy (Trust code of conduct), the school's behaviour policy, the role and names of the DSL and their deputy(ies), and Keeping Children Safe in Education part 1 and annex B. This information will also be provided to new staff during induction.
- All staff and governors receive safeguarding and child protection training induction in line with advice from Gloucestershire's safeguarding partners, which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns including keeping safe online when remotely educating.
- All staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

- The safeguarding policy is made available via the school website and parents/carers are made aware of this policy and their entitlement to have a copy via the school handbook/newsletter/website. All parents/carers are made aware of the responsibilities of staff members regarding child protection procedures through the publication of the Safeguarding and Child Protection Policy and reference to it in the school's handbook.
- The school provides a coordinated offer of Family Help when additional needs of children are identified and contributes to joined up Family help approaches through either a single family help plan or a multi-disciplinary team.
- The school's lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.
- Community users organising activities for children are aware of the school's Safeguarding Policy, guidelines and procedures.
- The names of the designated members of staff for child protection, the DSL and deputy(ies), are clearly advertised in the school.
- All staff will be given a copy of Part 1 and Annex B of the current Keeping Children Safe in Education and will sign to say they have read and understood it. This applies to the Governing Body in relation to part 2 of the same guidance.

6.0 Roles and Responsibilities

6.1 The Trust Board will ensure that:

- there is a Safeguarding and Child Protection policy together with a staff behaviour policy (staff code of conduct).
- there is a Trustee responsible for safeguarding, and member of the executive leadership team (ELT), responsible for safeguarding arrangements. Catherine Leahy is the Trustee and the DCEO is the ELT member.
- the safeguarding and child protection policy, recruitment and managing allegations policies and procedures, including the staff code of conduct, are consistent with Gloucestershire Safeguarding Partners' and statutory requirements.
- the above policies are reviewed annually, and the Safeguarding and Child Protection Policy is publicly available on the school website.
- the safeguarding trustee will monitor, through the annual audit, that DSLs have the training, support, resources and opportunity to perform their role in accordance with the Trust job description for DSLs (Appendix 2).
- the Trust will ensure that, in the event of the DSLs absence, alternative provision is in place to meet the statutory requirements. This provision will have the same level and standard of training as the DSL.
- they have overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met.

6.2 The local governing board (LGB) will ensure that:

- a member of the senior leadership team has been appointed as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- at least one member of the governing body has completed safer recruitment training to be repeated every three years in line with the Trust expectations.
- the school is fulfilling its requirement to implement this policy.

6.3 The headteacher will ensure that:

- all staff, including temporary staff and volunteers, are provided with the school's safeguarding and child protection policy and staff code of conduct.
- all staff have read at least Part 1 of KCSIE, and that mechanisms through training and support are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- the school has communicated the procedures for dealing with allegations of abuse against staff (including the headteacher), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.
- the DSL and/or deputy(ies) are available throughout the school hours to deal with safeguarding issues and that appropriate cover is made for out of hours/out of term activities.
- on appointment, the DSL and deputy(ies) undertake interagency training and 'update' training every two years and, in between this time, keep themselves updated with relevant legislation.
- one or more deputy DSLs are appointed to provide support to the DSL, and that they are trained to the same standard as the DSL. The role will be explicit in their job description(s).
- all other staff have safeguarding training updated as appropriate so that they are appropriately equipped to support pupils to be themselves, e.g., if they are LGBTQI.
- they are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.
- children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE), and/or for maintained Academies through relationship, sex and health education (RSHE).

- appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- appropriate safeguarding responses are put in place for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- when alterative provision is used (AP), the school remains responsible for any child in this setting. All due diligence checks will be undertaken to ensure that children are safe within these settings, using the agreed protocols. These must be updated half termly.
- appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school), and Section 128 checks are in place for all governors.
- when letting the school premises to other organisations, checks will be made to ensure that the appropriate safeguarding arrangements are in place to keep children safe, and this will be a condition of the letting agreement.
- any weaknesses in safeguarding are remedied immediately.
- the Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.
- the Safeguarding and Child Protection policy is publicly available on the school website or by other means.
- sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings. DSL job description is found at Appendix 2.
- where there is a safeguarding concern that the child's wishes and feelings are considered when determining what action to take and what services to provide.
- systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart.
- all staff feel able to raise concerns about poor or unsafe practice about any member of staff including volunteers and supply teachers. Any such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online and this will

be appropriate to the age and stage of the pupils and personalised where appropriate.

- they liaise with the Local Authority Designated Officer (LADO) and the DCEO, before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer.
- anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.
- appropriate contact with pupils does not prevent staff members from using reasonable force and other restrictive interventions.
- all staff and pupils understand the school's position around the use of mobile phones.

6.4. The Designated Safeguarding Lead:

- holds ultimate responsibility for safeguarding and child protection in the school including online safety of pupils.
- acts as a source of support and expertise in carrying out safeguarding duties for the whole school community, including close liaison with the school's mental health lead.
- encourages a culture of listening to children and taking account of their wishes and feelings.
- is appropriately trained with updates every two years and will ensure that they refresh their knowledge and skills at regular intervals throughout the year.
- liaises with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically, including through community-based early help, family help and statutory services when appropriate.
- will coordinate the school's approach to community-based early help and targeted family help.
- will keep detailed, accurate, secure records, of all concerns and decisions made about a child even if there is no need to make a referral. They will ensure that records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the impact of their actions.
- will ensure that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil and ensuring secure transit) and that confirmation of receipt is obtained.
- will act as a point of contact with safeguarding partners and professionals in line with Working Together to Safeguard Children.
- will ensure that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.

- will ensure that all staff sign to say they have read, understood and agree to work within the school's safeguarding policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education Part 1.
- will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents.
- will organise child protection and safeguarding induction, regularly update training (including that related to online safety which will include information about filtering and monitoring) for all school staff, keep a record of attendance and address any absences from the training;
- will contribute to and provide, with the headteacher and chair of governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Education Safeguarding Team at GCSP;
- will ensure that the names of the Designated Safeguarding Lead and deputies are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- will ensure that there appropriate arrangements are in place to provide effective DSL cover during school hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely response to concerns.

6.5 The Deputy Designated Safeguarding Lead(s):

- is/are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all of the functions above. The role will be explicit in their job description(s).

6.6 All school staff will:

- consider, at all times, what is in the best interests of the child
- maintain an attitude of 'it could happen here' where safeguarding is concerned.
- provide a safe environment in which pupils can learn.
- read and understand at least 'Part one' of KCSIE.
- identify, challenge and report racist, discriminatory, prejudicial or harmful language and behaviour, including online, in accordance with school procedures.
- be aware of the school's systems which support safeguarding, including any polices procedures, information and training provided upon instruction.
- understand that no one staff member can have a full picture of a child's needs and circumstances therefore it is everyone's responsibility to safeguard and promote the welfare of children. Staff have a role to play in identifying concerns, sharing information and taking prompt action by

immediately speaking to the DSL or a deputy. If necessary, where the child is at immediate risk to the police or children's social care;

- know how to respond to a pupil who discloses abuse through delivery of 'Working together to Safeguard Children', and 'What to do if you suspect a Child is being Abused' (2015);
- 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.
- promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- empower pupils and help them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- avoid victim -blaming attitudes and challenge it in a professional way if it occurs.
- be aware of the school's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention.
- provide a safe environment in which children can learn.
- regularly update their safeguarding training, including awareness of online safety and their roles and responsibilities in relation to filtering and monitoring to reduce risk.
- personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.
- ensure that they comply with the school's policy regarding mobile phones.
- safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties as outlined in the 'Teachers Standards' (teachers).
- report any cases to the police where it appears that an act of FGM has been carried out as soon as possible (teachers).

6.7 The safeguarding governor:

- will undertake training appropriate to the role.
- will check that the SCR is being monitored regularly across the year.
- ensure through their monitoring activities that the school is fulfilling its requirement to implement this policy.

6.8 The designated teacher:

- has a responsibility for promoting the educational achievement of LAC and previously LAC 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.

7.0 Information sharing

7.1 The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for community-based early help or family help.

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

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies. They will ensure that fear of sharing information does not stand in the way of their responsibilities to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.

7.2 Where decisions are made about sharing or withholding information there will be based on consideration of the risks to the pupil and, where appropriate the rationale for decisions will be recorded.

7.3 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. 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.

7.4 However, we also recognise that all matters relating to child protection are personal to children and families. All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies. Therefore, the headteacher or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.

7.5 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 agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

7.6 We will always undertake to share our intention to refer a child to Social Care with parents/carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with other

professionals, including use of the NPCC when to call the police materials to determine the next step.

7.7 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.

7.8 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.

7.9 We will always ensure that we keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

7.10 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.

8.0 Child Protection Procedures

8.1 All staff will be aware of the indicators of abuse, neglect, exploitation and modern slavery and will understand that children can be at risk of harm inside and outside of school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse. The school will recognise that abuse or neglect of a child may occur, through the infliction of harm, or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others. Staff will pay particular attention to the effects of domestic abuse on children recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

8.2 Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in Appendices 1 and 2.

8.3 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).

8.4 These harms include but are not limited to:

- child missing from education (see para 21)
- child criminal and child sexual exploitation (CSE) (see para 14)
- bullying including cyberbullying (see para 10)
- domestic abuse (see para 13)
- mental health
- radicalisation (see para 12)
- child on child abuse (see para 24)

8.5 Staff will be aware that technology is a significant component in many safeguarding and well-being issues and that risks such as abuse can take place online as well as face to face. Staff will also be aware that child-on-child abuse can also occur online. Staff will always speak to the DSL or deputy if they are unsure about something related to abuse, neglect or exploitation.

8.6 We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

8.7 Concerns about a child's welfare

8.7.1 If staff notice any indicators of abuse/neglect, mental health issues or signs that a child may be experiencing a safeguarding issue they should record these concerns and pass it to the DSL. They may also discuss their concerns in person with the DSL, but the details of the concern should be recorded in writing. 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.

8.7.2 There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.

8.7.3 It is recognised that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.

8.7.4 In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

8.7.5 Staff should record these early concerns and alert the DSL.

8.7.6 Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing using the agreed systems for the school.

8.7.7 If the pupil does reveal that they are being harmed, staff should follow the advice below regarding a pupil making a disclosure.

8.8 A pupil discloses to a member of staff.

8.8.1 We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

8.8.2 A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

8.8.3 During their conversation with the pupil staff will:

- listen to what the child has to say and allow them to speak freely,
- remain calm and not overact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener,
- reassure the child that it is not their fault and that they have done the right thing in telling someone
- not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk,
- take what the child is disclosing seriously,
- ask open questions and avoid asking leading questions,
- avoid jumping to conclusions, speculation or make accusations,
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused,
- avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong,
- tell the child what will happen next.

8.8.4 If a pupil talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

8.8.5 The member of staff should write up their conversation as soon as possible in the child's own words. Staff should make this a matter of priority. The record should be signed electronically if needed and dated, the member of staff's name should be included, and it should also detail where the disclosure was made and who else was present. The record should be shared with the DSL.

8.9 Notifying Parents

8.9.1 The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

8.9.2 However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

8.9.3 There are concerns about forced marriage or honour-based abuse parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

8.10 Making a referral

8.10.1 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.

8.10.2 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.

8.10.3 All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing. All electronic reports should follow Trust guidance to ensure that there is a clear and accurate record of the concern.

8.10.4 If a referral is needed, then the DSL should usually make it. In their absence the DDSL should refer. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves.

8.10.5 The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

8.10.6 The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the well-being 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.

8.10.7 If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral. 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.

8.10.8 Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

8.10.9 All staff have a responsibility to exercise professional curiosity, professional challenge and respectful escalation where they believe a child's needs are not being appropriately addressed. Where there are professional disagreement, or where safeguarding concerns are not acted upon appropriately, staff must escalate concerns without delay. This may include raising concerns with safeguarding leads, senior leaders, or where necessary direct escalation, and a request for re-consideration with the Child and Social Care Services (CSCS) to ensure their concerns have been addressed, and most importantly the child's situation improves.

8.10.10 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 Family Help.

8.10.11 Click here for the link to Gloucestershire Safeguarding Children's Procedures for further information.

8.11 It is recognized that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. Staff will be provided with an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

9.0 Children who are particularly vulnerable

9.1 Some children may be particularly vulnerable. The school recognises that children with SEND or certain medical or physical health conditions, those who have a social worker, or those questioning their gender, may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Children with disabilities are three times more likely to be abused than their peers. Staff will consider whether additional pastoral or safeguarding support is required for these pupils. The school will ensure that safeguarding concerns are responded to appropriately taking account of individual needs and circumstances.

9.2 All pupils have the right to be safeguarded from harm, regardless of race, religion, ethnicity, age, gender, sexuality or disability. The school will give special consideration to these children. The school recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age,

developmental stage, intent, frequency and seriousness of the behaviour as well as the needs of all children involved.

9.3 Pupils may require social workers due to abuse, neglect, exploitation, or complex family circumstances. Experiences of trauma and adversity can increase their vulnerability to harm and create barriers to attendance, learning, behaviour, and mental health.

The DSL will routinely hold and use information provided by the local authority regarding pupils with a social worker to support decisions that promote their safety, welfare, and educational outcomes. This information will inform safeguarding assessments and any necessary adaptations to provision.

The designated teacher will work closely with the local authority to promote the educational achievement of looked-after children (LAC) and previously looked-after children (PLAC).

9.4 Pupils with medical conditions may require additional safeguarding considerations. Where concerns indicate that a pupil may be at increased risk of neglect, abuse or exploitation, the school will respond appropriately and in line with the Trust's *Supporting Pupils with Medical Conditions Policy*.

9.5 Pupils who are questioning their gender may have additional vulnerabilities, including mental health needs. The school will consider each case individually, acting in the best interests of the pupil while safeguarding the wellbeing of all pupils.
The school will not initiate social transition. Requests for support from pupils or parents will be managed in line with current DfE guidance. Staff will respond sensitively to any disclosure, listen without judgement, and explain that information may need to be shared with the DSL where necessary to safeguard the pupil's welfare. The school will maintain a culture where bullying is not tolerated and will ensure appropriate support is available for pupils who are questioning their gender. The DSL will maintain clear records of any requests relating to social transition, including the factors considered, decisions made, and the rationale for those decisions.

9.6 Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse. To ensure that all of our pupils receive equal protection we will give special consideration to children who:

- are disabled or have special educational needs.
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines activity.
- are young carers.
- have a mental health need.
- are frequently missing/goes missing from education, home or care.
- are at risk of modern slavery, trafficking, sexual and or criminal exploitation.
- are at risk of being radicalised or exploited.

- have experienced multiple suspensions, is at risk of being permanently excluded from schools, and in alternative provision or a pupil referral unit.
- have a parent or carer in custody or is affected by parental offending.
- experience challenging family circumstance such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing alcohol or drugs themselves
- are at risk of honour-based abuse such as female genital mutilation or forced marriage
- are privately fostered child.

10.0 Anti-Bullying/Cyberbullying

10.1 The policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g., cyber, racist, homophobic and gender related bullying. Leaders will record bullying incidents and will ensure that this is shared with and analysed by the governing body and the central team. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

10.2 If bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the headteacher and the DSL will consider implementing child protection procedures.

10.3 The subject of bullying is addressed at regular intervals in PHSE /RSHE education.

11.0 Racist incidents

11.1 The RSHE curriculum reflects a commitment to fostering an inclusive, anti-racist and anti-discriminatory school community in which every child and adult is treated with dignity, respect and fairness. We recognise and celebrate the diversity of our school and wider community and will not tolerate discrimination, prejudice, harassment or victimisation related to any protected characteristic under the Equality Act 2010, including age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.

Through RSHE, pupils will develop the knowledge, understanding and skills needed to build positive relationships, appreciate the lived experiences and perspectives of others, challenge stereotypes and discrimination, and engage in respectful disagreement. We aim to equip pupils to recognise, understand and challenge racism, prejudice and discriminatory behaviour, both online and offline.

In line with *Working Together to Safeguard Children 2026*, we recognise that racism and discrimination can have a significant impact on children's wellbeing, sense of belonging, mental health, educational outcomes and safety. Staff are expected to identify, record, challenge and respond appropriately to racist language, attitudes, behaviours and incidents.

Racist behaviour, including racist language, bullying, harassment, prejudice-based incidents and online abuse, will not be tolerated. All incidents will be taken seriously, investigated promptly, recorded and addressed through appropriate educational, behavioural and restorative approaches. Parents and carers will be informed where appropriate.

We recognise that repeated racist incidents, targeted harassment, or a single serious racist incident may constitute a safeguarding concern. Such incidents will be considered in the context of the child's welfare and the impact on those affected and may result in referral through safeguarding or child protection procedures.

The school will monitor and analyse information relating to racist incidents and discriminatory behaviour to identify patterns, address inequalities, inform staff development and ensure continuous improvement in our safeguarding and inclusion practice.

12.0 Radicalisation and Extremism

12.1 The Prevent Duty for England and Wales (2015) under section 26 of the Counter- Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. The Trust and all constituent schools are required as partners of the Channel programme to co-operate with the panel and the police in undertaking initial assessments and referrals as required.

12.2 Extremism is defined as 'as '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.

12.3 Some children may be susceptible to radicalisation, adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

12.4 We are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

12.5 We seek to protect children and young people against the messages of all violent extremism, recognising that intervention may help to prevent and protect children at risk of radicalisation.

12.6 School staff receive regular training to help identify early signs of radicalisation and extremism.

12.7 Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

12.8 The school governors, the headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessments may include the use of school premises by external agencies, anti- bullying policy and other issues specific to the school's profile, community and philosophy.

12.9 When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Gloucestershire Police Department must be contacted by dialing 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264). UK Gov guidance on how to make a prevent referral is linked here.

13.0 Domestic Abuse

13.1 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.

13.2 Domestic abuse represents one quarter of all violent crime. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, coercive or controlling behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types 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.

13.3 We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

13.4 Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

13.5 Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse and recognise the impact of domestic abuse on children, as victims in their own right. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

14.0 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

14.1 Perpetrators may subject children and young people to multiple forms of abuse such as criminal exploitation (including county lines) and sexual exploitation. In these cases, the exploitation/abuse will be in exchange for something the victim wants or needs. Children are exploited for money, power or status. CCE /CSE can happen online and offline and all staff should be aware of the link between online safety and vulnerability for pupils. Child exploitation may also be modern slavery. Staff in this school are aware that the experience of girls who are criminally exploited can be very different to boys. The indicators may not be the same. Both girls and boys are at risk of CCE/CSE. Staff are also aware that for children being criminally exploited they may be at higher risk of sexual exploitation.

14.2 Any concerns that a child is being or is at risk of being criminally or sexually exploited should be passed without delay to the DSL. There is a clear link between regular school absence/truanting and CCE/CSE. Staff should consider a child to be at potential CCE/CSE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.

14.3 The DSL will use Gloucestershire's Safeguarding Partners Guidance on all occasions when there is a concern that a child is being or is at risk of being criminally or sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being exploited.

14.4 In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact their local Referral, Intervention and Assessment team and email the completed CSE Screening Tool along with a Multi-Agency Referral Form (MARF). If a child is in immediate danger the police should be called on 999.

14.5 A child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Therefore, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

14.6 The risks of criminal and sexual exploitation are covered in the PHSE and SRE curriculum in an age-appropriate way. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing them harm. They will be supported in terms of recognising and assessing risk in relation to CCE/CSE, including online, and knowing how and where to get help.

15.0 Female Genital Mutilation (FGM)

15.1 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. Teachers are legally required to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police. Failure to do this will result in disciplinary action.

15.2 The duty applies to all persons who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed and will provide guidance.

15.3 If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

15.4 School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported as per the safeguarding protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

15.5 Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialing 999 if appropriate.

15.6 There are no circumstances in which a teacher or other member of staff should examine a girl.

16.0 Forced Marriage

16.1 A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure.

It may also involve physical or sexual violence and abuse.

16.2 Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

16.3 A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

16.4 School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit 020 7008 0151.

17.0 Honour-based Violence (including FGM and Forced Marriage)

17.1 Honour-based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. These practices include FGM and Forced Marriage.

17.2 Honour-based abuse might be committed against people who.

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

17.3 It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

18.0 Mental Health

18.1 All staff within the school will be aware that a pupil displaying mental health problems could be as a result of the pupil being at risk of or having suffered abuse, neglect or exploitation. Staff will be aware of the lasting impact that this may have on a child which can last into adolescence and into adulthood.

18.2 Staff will ensure that they will fully consider the impact of mental health on pupils' behaviour and education, particularly if adaptations are required as part of an individual education plan or pastoral support plan.

18.3 Any staff member who is concerned about a pupil should refer to the DSL or their deputy so that the appropriate professional advice and support can be sought from professionals if needed and the full range of evidence is held, so that in line with the school's safeguarding policy, if there is a safeguarding concern, a referral can be made.

18.4 Pupils will be taught about how to safeguard themselves and their own well-being through the delivery of the statutory Relationships Sex and Health education curriculum delivered throughout the school in line with our policy for RSHE. Staff will consider when delivering this, any additional needs specific pupils may have and any resulting adaptation to the curriculum that is required.

19.0 One Chance Rule

19.1 All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a pupil who is a potential victim and have just one chance to save a life.

19.2 All staff are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

20.0 Private Fostering Arrangements

20.1 A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential academies, children's homes or hospitals are not considered to be privately fostered.

20.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

20.3 This school recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

20.4 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, when a member of staff becomes aware that a pupil may be

in a private fostering arrangement, they will raise this with the DSL, and the DSL will notify Gloucestershire Children's Social Care of the circumstances.

21.0 Looked After Children

21.1 The most common reason for children becoming looked after is as a result of abuse and neglect. This school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

21.2 The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Gloucestershire County Council's virtual school head for children in care.

The Designated Teacher for Looked After Children is: Mrs Hayward

21.3 The designated teacher for a looked after child works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan.

22.0 Children Missing Education

22.1 Attendance, absence and exclusions are closely monitored in line with our attendance policy. A child who is absent from education, particularly when this is repeated or for prolonged periods of time is a potential indicator of abuse and neglect, including criminal and sexual abuse /exploitation.

22.2 The school's attendance lead will monitor unauthorised absences and take appropriate action, including notifying the DSL and local authority, particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'.

22.3 Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

22.4 The school will ensure that the relevant personal information will be kept for each pupil including two emergency contact details where possible.

22.5 Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest date. The school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for Elective Home Education, the school will ensure that they have met with parents ahead of any final decision being made. The Headteacher will ensure that all relevant authorities including the LA and other key professionals are aware of the decisions. If the pupil has SEND, is vulnerable, and/or has a social worker, the HT will ensure that the social worker and other professionals working with the pupil are aware.

23.0 Online Safety

23.1 The school will always adhere to the Online Safety Policy. As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online through an ever-changing and evolving landscape of online risk.

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.
- The filtering systems in place and will know how to escalate concerns where they are identified.
- The four categories of risk as outlined in KCSIE; content, conduct, contact and commerce.

The school will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material and will regularly check and review the effectiveness of these systems. 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. The DFE's filtering and monitoring standards will be used to review ensure compliance is met.

Further information regarding the school's approach to online safety can be found in the school's own processes.

23.2 Reviewing online safety annually is a key priority for the school. 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.

23.3 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 school's online policy and Trust code of Conduct. Should there be a need for a pupil to bring a mobile phone into the school it will be handed in at the start of the day and safeguarded in the office until the end of the day. No pupil will have access to a mobile phone in the classroom unless there is a medical reason.

Please see the Supporting Pupils with Medical Conditions Policy for information regarding this.

Photographs and videos of pupils will be carefully planned before any activity with regard to consent and adhering to the school's Data Protection Policy.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

23.4 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. This will be signposted through the school's website and the links contained on it as well as through newsletters and other information sessions.

The school will also make it clear to parents what their children are being asked to do online for school, especially when learning remotely.

<u>The school online safety coordinator is</u>: Mrs Lewis

24.0 Child on Child Abuse

24.1 In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. We recognise that children are capable of abusing their peers. It will never be passed off as 'banter' or 'part of growing up' as a school we take a zero-tolerance approach to this behaviour. All staff will be vigilant to the prospect that this could happen in this school. Child on Child Abuse can take place on or offline and can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- 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.
- Up skirting – can happen to any gender.
- 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.

24.2 This school aims to reduce the likelihood of child-on-child abuse through:

- the established school values
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE/RSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe on and offline;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

24.3 Research indicates that young people rarely disclose child on child abuse and that if they do, it is likely to be to their friends. Therefore, this school will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

24.4 Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a child's dignity and makes them feel intimidated, degraded, or humiliated and can create a hostile, sexualized or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalised inappropriate behaviour and may lead to sexual violence. Sexual harassment includes:

- Sexual comments
- Sexual "jokes" and taunting
- Physical behaviour, such as deliberately brushing against another pupil
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

24.5 Sexual Violence refers to the following three offences:

- Rape
- Assault by Penetration
- Sexual Assault

24.6 Harmful sexual behaviours is a term used to describe behaviour that is problematic, abusive and violent and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases,
- Inappropriate touching/physical behaviours that are potentially criminal in nature,
- Sexual violence or threats,
- Full penetrative sex with other children or adults,
- Sexual interests in adults or children of very different ages to their own,
- Forceful or aggressive sexual behaviour,
- Compulsive habit's,
- Sexual behaviour affecting progress and achievement.

24.7 Preventative Approach

The school will ensure that a preventative approach is in place through educating pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies, RSHE and PSHE lessons. The school will also ensure that pupils are taught about safeguarding including online safety as part of a broad and balanced curriculum. Such content will be age and stage appropriate and will tackle a wide range of issues such as healthy relationships, respectful behaviour, body confidence and self –esteem and gender roles and stereotyping and equality. The impact of this will be checked through pupil voice throughout the year, including through the annual safeguarding audit process by the Trust central team.

24.8 Awareness

24.8.1 All staff will be aware that pupils of any age and sex can abuse their peers and will never tolerate abuse as "banter" or "part of growing up".

24.8.2 All staff will be aware that child-on-child abuse can be manifested in many ways, including sexting and gender issues, such as girls being sexually touched or assaulted and boys being subject to initiation types of violence which aims to cause physical, emotional or psychological harm.

24.8.3 All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their non-SEND peers. Staff will not assume that possible indicators of abuse relate to the pupils SEND and will always explore indicators further.

24.8.4 LGBTQI children can be targeted by their peers. In some cases, children who are perceived to be LGBTQI, whether they are or not, can be just as vulnerable to abuse as LGBTQI children. The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be as equally robust as it is for incidents between children of the opposite sex.

24.8.5 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.

24.9 Support will be available for any child who has been harmed, who is in immediate danger or at risk of harm. Options for this include managing the support internally via the school's own pastoral support processes, undertaking a Family Help assessment or making a referral for the pupil using the normal channels and following the appropriate process.

24.10 Support when a crime may have been committed

24.10.1 Support will be available whether a crime has been committed or not. Rape, assault by penetration and sexual assaults are all crimes. Where a report includes such an act, the police will be notified often as a natural progression of making a referral. The DSL will be aware of the local process for referrals. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the DSL will still refer to the police. The school should have a close relationship with the local police, and the DSL will liaise closely with them.

24.10.2 Support will also be available should the report include online behaviour. Online concerns can be especially complicated. The school recognises that there is the potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

24.10.3 If a child makes a disclosure that includes images that contain either sexual images or videos staff will not view these images and will explain to the child that this will need to be shared with the DSL and contact them immediately. The images/videos should not be deleted, and the DSL will make the appropriate referrals.

24.11 Managing Disclosures

24.11.1 Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed. The basic principles for recording the report remain the same and staff will remember to not promise confidentiality at the initial stage and will record the disclosure using the normal school processes ensuring that the facts are recorded as the child presents them – not the opinion of the note taker. If a friend of a victim makes a report or a member of staff overhears a conversation, staff will act. They will never assume that someone else will deal with it. However, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of the LA and SC where necessary. If staff are in any doubt, they should speak to the DSL, who will decide using all available guidance, including from the NPCC, when to call the police.

24.11.2 Where an alleged incident took place away from the school or online but involved pupils from the school. The school's duty to safeguard pupils remains the same.

24.11.3 Anonymity – There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of the children involved in any report of sexual violence or sexual harassment. It will consider carefully, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

24.11.4 When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

24.12 Risk Assessment - The DSL or deputy DSL will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or specialist worker will be required. Risk assessments will consider the victim, the alleged perpetrator and other children at the school, especially any actions that are appropriate to protect them. Any risk assessment will be discussed and consulted with parents and carers and victims where appropriate.

24.13 Taking action following a disclosure

24.13.1 The DSL will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

24.13.2 Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved. Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

24.14 Ongoing support for the victim

24.14.1 For reports of sexual assault of any nature, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator. In all cases, the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

24.14.2 There are four likely outcomes when managing reports of a sexual violence or sexual harassment:

- Managing internally - in some cases the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support or other specialist internal support.
- Providing early help – The school may decide that statutory interventions are not required, but that pupils may benefit from the Family Help offer - providing support as soon as a problem emerges. This approach can be particularly useful in addressing non–violent sexual behaviour and may prevent escalation of sexual violence.
- Referral to Social Care - if a child has been harmed, is at risk of being harmed or is in immediate danger, the school must make a referral. Parents will be informed unless there is a compelling reason not to do so. This decision will be made in consultation with the safeguarding partners. The DSL will work closely with Social Care to ensure that the school's actions do not impact any investigation. Any related risk assessment will be used to inform all decisions. If Social Care decides that a statutory investigation is not appropriate, the school will consider referring to the incident again if they believe the child to be in immediate danger or at risk of harm. If the school agrees with the decision made by Social Care, they will consider the use of other support mechanisms such as Family Help.
- Reporting to the police – reports of rape, assault by penetration, or sexual assault will be passed onto the police, even if the perpetrator is under ten years of age. Generally, this will be in parallel with a referral to social care. The DSL and deputies will follow the local process for referral. Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed it is essential that the school supports the child with any decision taken in consultation with Social Care and any other specialist agencies.

24.14.3 Whatever outcome chosen it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions, and reason behind decisions, will be recorded on paper or electronically. Due process will be always followed.

24.14.4 The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity,
- The age of consent is 16,
- Sexual intercourse without consent is rape,
- Rape, assault by penetration and sexual assault are defined in law,
- Creating and sharing sexual images and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

24.14.4 Any decisions regarding safeguarding and supporting the victim will be made having duly considered:

- the age and developmental stage of the victim,
- the needs and wishes of the victim,
- whether the victim wishes to continue in their normal routine,
- the victim will not be made to feel ashamed about making a report,
- what is a proportionate response,
- the terminology the school uses to describe the victim.

24.14.5 Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident in small segments, consequently short sessions may be needed to be the approach considered, and dialogue needs to be kept open to facilitate this. The victim may choose to appoint a trusted adult.

24.14.6 Victims may struggle to reintegrate back into a normal classroom environment; therefore, it is important not to isolate the victim. The victim may wish to be withdrawn from lessons and activities at times. This will only occur at the victims wishes, not because it is easier to manage the situation. The school will provide a safe space for the victims to use at this time.

24.14.7 Victims may struggle for a long period of time, and the school will need to offer long-term support in liaison with the relevant agencies for as long as this is needed.

24.14.8 Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made. If the victim is unable to remain in school, alternative provision or a move to another school will be considered – this will only be done at the request of the victim and their parents. If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

24.15 Ongoing support for the alleged perpetrator

24.15.1 When considering the support required for an alleged perpetrator, the school will take into account:

- The terminology is used to describe the alleged perpetrator or perpetrator,
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support,

- The reasons why the alleged perpetrator may have abused the victim and the support necessary.
- Their age and developmental stage,
- What a proportionate response looks like,
- Whether the behaviour is a symptom of their own abuse of exposure to abusive practices and/or materials.

24.15.2 When making a decision, the school will seek advice from the LA, SC, specialist sexual violence services and the police as appropriate.

24.15.3 If the alleged perpetrator moves to another school, for any reason, the DSL will inform the destination school of any ongoing support that is required and transfer the child protection file in the usual way.

24.15.4 The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and rescue the likelihood of them abusing again.

24.16 Disciplining the alleged perpetrator

24.16.1 Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusions and imposing an appropriate penalty. The school will make decisions on a case-by-case basis, with the DSL taking a lead role. The school will take into consideration whether any action will prejudice an investigation and/or subsequent prosecution. The police and SC/LA will be consulted where necessary.

24.16.2 The school will also consider whether circumstances make it unreasonable or irrational for the school to decide what happened while an investigation is considering the same facts.

24.16.3 Disciplinary action and support can take place at the same time as the safeguarding process. The school will be clear as to whether any action taken is disciplinary, supportive or both.

24.16.4 Where a criminal investigation leads to a conviction or caution this will constitute a serious breach of discipline and will result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils. This means permanent exclusion. Guidance will be sought at all times for any such cases.

24.17 Working with parents and carers

24.17.1 In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment decisions will be made on a case-by-case basis. The school will meet the victim's parents with the victim present to discuss the arrangements set out in the risk assessment being put in place to safeguard the victim and to understand their wishes in terms of support arrangements and next steps.

24.17.1 The school will also meet the parents of the alleged perpetrator to discuss the arrangements, including any risk assessments that are being put into place that will impact on their child, such as being removed from classes with the victims, changes to routines etc. Reasons behind these decisions are explained as well as the support being made available. The DSL or a deputy will attend such meetings, with agencies invited, as necessary.

24.18 Safeguarding other children - children who have witnessed sexual violence will be provided with support. It is likely that children will "take sides" following a disclosure and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The school will be mindful that contact may be made between the victim and perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent this and will record this on the risk assessment. The school will also ensure that the school's risk assessment considers transport arrangements as a vulnerable place for both victims and perpetrators and any additional support that could be put into place to mitigate risk.

25.0 Sexting and the production of indecent images

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

25.2 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 in how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how to report instances of sexting.

25.3 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.

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

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support because the child has shared before they could stop them.
- 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.

25.5 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 making and sharing of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

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

- Discuss this decision with the headteacher.
- Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made to view the imagery in accordance with the KCSIE requirements.

25.7 The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm, a referral should be made to Children's Social Care or the Police as appropriate.

25.8 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 SC. 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.

25.9 Where the incident is categorised as 'aggravated', immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult;
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);

- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under;
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

25.10 The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures

26.0 Homelessness

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

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

- Household debt
- Rent arrears
- Domestic Abuse
- Anti-social behaviour
- Any mention of the family saying they are moving home because "they have to"

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

27.0 Serious violence

27.1 All staff will be aware of the indicators that may signal a pupil is at risk of or involved with serious violent crime. Staff will make the DSL aware of any pupils for whom they have concerns because of increased absence, new friendships, especially with much older individuals or groups, a decline in performance, signs of self-harm or changes to wellbeing, signs of assaults or unexplained injuries. Unexplained gifts or new possessions might also be an indication that pupils have been involved with criminal activity.

27.2 County lines criminal activity refers to drug networks or gang grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns. All staff understand that they must remain open to the possibility that this could be happening here.

27.3 Staff members who suspect a pupil may be vulnerable to or involved in serious crime including county lines, will immediately report all concerns to the DSL. A safeguarding referral will be considered alongside the availability of local help

and support for victims of child criminal exploitation and county lines exploitation.

27.4 The DSL will consider referral to the national referral mechanism on a case-by-case basis.

28.0 Pupils with family members in prison

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

28.2 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 with staff.

29.0 Pupils required to give evidence in court

29.1 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.

29.2 Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service were appropriate and allowed the opportunity to discuss questions and concerns.

30.0 Contextual Safeguarding

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

30.2 Assessment of pupil's behaviour will consider whether there are wider environmental factors that are a threat to their safety or welfare.

30.3 The school will provide as much contextual information as possible when making referrals.

31.0 Alternative Provision

31.1 The school will remain responsible for a pupil's welfare during their time at an alternative provider. The SENCO and DSL will visit the alternative provision to ensure that the setting is safe, and that supervision is appropriate. They will ensure that they follow the Trust Alternative Provision guidance to ensure that all safeguarding checks have been undertaken. There will be regular communication with the alternative provision to ensure that any concerns or non-attendance are shared immediately. This is because the school remains the lead provider for the pupil. The alternative provision should update the school should they have any concerns. The pupil will be dual rolled for this period. Records in school will evidence the nature of the provision, the

interventions, therapy, key objectives in place as well as the review dates and progress made. Transition plans back to home school will also be in place.

31.2 When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has appropriate safeguarding checks that have been conducted on individuals working at their establishment. This will include written confirmation that the alternative provider will inform the school of any arrangements that may put the pupil at risk. The provider will commit to ensuring that the school is informed of any staffing changes.

31.3 The school will ensure that the location of pupils placed in AP is always known and will retain records of the address of the alternative provider and any subcontracted provision or satellite sites that the pupil may attend. Leaders will be aware of the daily whereabouts of pupils, especially if the provision is placed across split sites.

31.4 The school will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting pupils' individual needs. AP placement reviews will take place at least half termly to ensure that pupils are regularly attending, and the placement continues to be safe and meeting pupils identified needs.

32.0 Work Experience

32.1 When a pupil is in the school on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place before the placement commences. 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.

33.0 Family Help

33.1 Family Help means providing support as soon as a problem emerges at any point in a child's life. Any pupil may benefit from targeted early help, but staff will be particularly alert to those very vulnerable pupils identified in para 9.5. The school's approach to this support will be shared through the offer of Family Help published on the school's website. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm, whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

33.2 The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from Family Help, for example, if they are:

- bereaved.
- viewing problematic or inappropriate online content or developing inappropriate relationships online.

- have recently returned home to their family from care.
- missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where this support is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local Family Help process will be followed as required.

Staff may be required to support other agencies and professionals through these assessments, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation is not improving or is worsening.

34.0 Allegations against staff including supply staff, volunteers and contractors

34.1 This school will ensure that they will follow due referral process, when any allegation is made that would indicate that a member of staff, supply teacher, volunteers or contractor has:

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

Examples of behaviour could include but are not limited to:

- being over friendly with children,
- having favourites,
- inappropriately handling a pupil,
- taking photographs of children on their mobile phone, contrary to school policy,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or,
- humiliating pupils.

The Trust's policy and process for managing allegations will be followed in line with statutory guidance from KCSIE. The headteacher will decide on whether or not a concern is low level and whether or not this should be shared with the LADO and the DCEO. All allegations /concerns whether low level or not should be recorded carefully and should include the headteacher's decision making as well as any actions that need to be taken. The headteacher must not speak to the member of staff if a 'Harm Threshold' has been met until LADO advice has been sought and next steps are identified. Only then will the headteacher

ensure that an investigation is undertaken so that due process is followed. This will be recorded and stored securely using the Trust's agreed systems.

34.2 This school will ensure that when an allegation is made it will always consider the following key principles:

- look after the welfare of the child
- ensure the integrity of the investigation
- support the person subject to the allegation.

34.2.1 The DSL or their deputy will be responsible for ensuring that the child is not at risk and making the appropriate referrals, in accordance with guidance in KCSIE. The headteacher will be responsible for ensuring that the appropriate referral is made to the LADO and the DCEO. This will determine the course of action for responding to the allegation. Any process should be undertaken in line with the Trust's Allegation Management Process.

34.3 Guidance about conduct and safe practice will be given at induction. All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

34.4 We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member.

34.5 If such an allegation is made, or information is received, which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or who is aware of the information, will immediately inform the headteacher.

34.6 The headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action. The headteacher will also inform the DCEO. Where the concern being raised involves conduct issues as well safeguarding concerns, the safeguarding element is always addressed first.

34.7 If the allegation made to a member of staff concerns the headteacher, the person receiving the allegation will immediately notify the DCEO who will follow due process.

34.8 The school will follow Gloucestershire procedures for managing allegations against staff, set out in Keeping Children Safe in Education and the Trust's Managing Allegations procedures.

34.9 Suspension of the member of staff, excluding the headteacher, against whom an allegation has been made, needs careful consideration, and the headteacher will seek the advice of the LADO, HR and the DCEO in making this decision.

34.10 In the event of an allegation against the headteacher, the decision to suspend will be made by the DCEO and CEO.

34.11 Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Section 13 of the Education Act 2011 sets out the parameters for this restriction. Publication includes verbal conversations or writing including content placed on social media sites.

34.12 In circumstances where an allegation is made about an individual not employed by the school, for example a student teacher or a contractor, the DSL will follow guidance as set out in KCSIE. KCSIE is clear in its understanding that in this instance safeguarding responsibilities are shared between the employer/home organisation and the school.

34.13 If an allegation is made about an incident that occurred when an individual or organisation is using the school premises to run activities for children, such as sports association or extra-curricular activities, schools must follow Trust policies and procedure, including informing the LADO.

35.0 Whistleblowing

35.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

35.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

35.3 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk. Staff can also seek confidential advice at any time from Protect, a registered charity which advises on serious malpractice in the workplace. For more information visit their website or call them on 020 3117 2520.

35.4 Whistleblowing related to the headteacher should be made to the chair of the governing Body or the CEO/DCEO whose contact details are readily available to staff.

36.0 Appropriate physical contact with pupils

36.1 It is recognised that some touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they

are clear about their professional boundary. The school will not agree to any request from parents of staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach would leave staff unable to intervene appropriately to safeguard pupils and others.

36.2 Adults should not routinely engage in physical contact with pupils, as this can place both children and staff at risk of misunderstanding or allegations. However, in line with the Trust's Staff Code of Conduct, appropriate physical contact may be used where it is necessary, proportionate, and in the pupil's best interests. Staff will always exercise professional judgement, taking account of the context and circumstances, including the pupil's age, understanding, individual needs, and any vulnerabilities such as SEND. Consideration will also be given to whether other adults are present and whether the desired outcome can be achieved through alternative strategies that do not involve physical contact.

36.3 Any use of reasonable force will be in accordance with the DfE guidance 'Restrictive Interventions and use of Reasonable Force in schools' and the Trust's Behaviour Policy. Staff must use the minimal force necessary to prevent injury to another person. All such events must be recorded and signed by a witness.

36.3 Staff who are likely to need to use physical intervention will be appropriately trained in using techniques such as "Team Teach".

36.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

36.5 Any incident involving reasonable force will be recorded on the school's electronic system including the date, time, location, duration, the reason was necessary, the degree of force used and any injuries sustained. Parents will be informed in writing about serious incidents involving the use of force on day one of the incident. The DFE statutory guidance for reporting will be followed. Following any restrictive intervention, the school must provide emotional support, medical assessment (where appropriate) and an opportunity to debrief for both pupils and staff. This will allow leaders to consider what additional support, interventions or adaptations are required to prevent further incidents occurring. Other agencies and professional may well need to be involved with this.

37.0 Safer Recruitment

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

An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers 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.

The DfE's DBS Workforce Guidance will be consulted when determining whether a position fits the child workforce criteria.

The governing board will conduct the appropriate pre-employment checks for al prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks must be completed for all governors, volunteers, and contractors. No individual will be permitted to work or volunteer at the school until all required checks have been received, verified, and deemed satisfactory.

37.2 All schools' 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.

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.

37.3 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. 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.

38.0 Single Central Record

38.1 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. The Trust central team check and review this regularly. The Trust ensures that there is a central SCR which records all members of the proprietor body, including the Trustees and Central team staff.

38.2 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

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

For volunteers engaged in regulated activity, the school will record on the Single Central Record (SCR) all pre-appointment checks required for that role, including an enhanced DBS certificate with children's barred list information. Where checks are undertaken for volunteers not engaged in regulated activity, these will also be recorded on the SCR. Any risk assessment used to determine whether an enhanced DBS check is required for a volunteer will likewise be documented.

Under no circumstances will a volunteer for whom the appropriate checks have not been completed be left unsupervised or permitted to undertake regulated activity.

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

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

39.0 Training for Staff, Governors, and Trustees

39.1 Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis (at least termly) and/or whenever there is a change in legislation.

39.2 The induction training will cover:

- The Child Protection and Safeguarding Policy.

- The Child-on-child Abuse procedures.
- The Trust Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The 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.
- Information about the role of the Executive Lead for Safeguarding.

39.3 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.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Appropriate child protection and safeguarding training, including online safety training, which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.

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

39.4 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 community-based early help, family 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 conferences, 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.

40.0 Use of the school premises for non-school activities

40.1 Where the local 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.

40.2 Where the local governing board provides the activities under the direct supervision or management of school staff, school's own 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 local governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board 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.

41.0 Extracurricular activities and clubs

41.1 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.

41.2 Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including checking these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board 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.

41.3 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.

41.4 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.

42.0 Monitoring and Review

42.1 Leaders recognise the imperative to regularly review and consider the impact of this policy. Safeguarding arrangements are systematically monitored, regularly reviewed and strengthened through reflective practice, audit and governance oversight. Leaders ensure that learning from safeguarding practice reviews, serious incidents and local safeguarding partnership guidance informs continuous improvement to policy, training and practice, to promote effective safeguarding and positive outcomes for children.

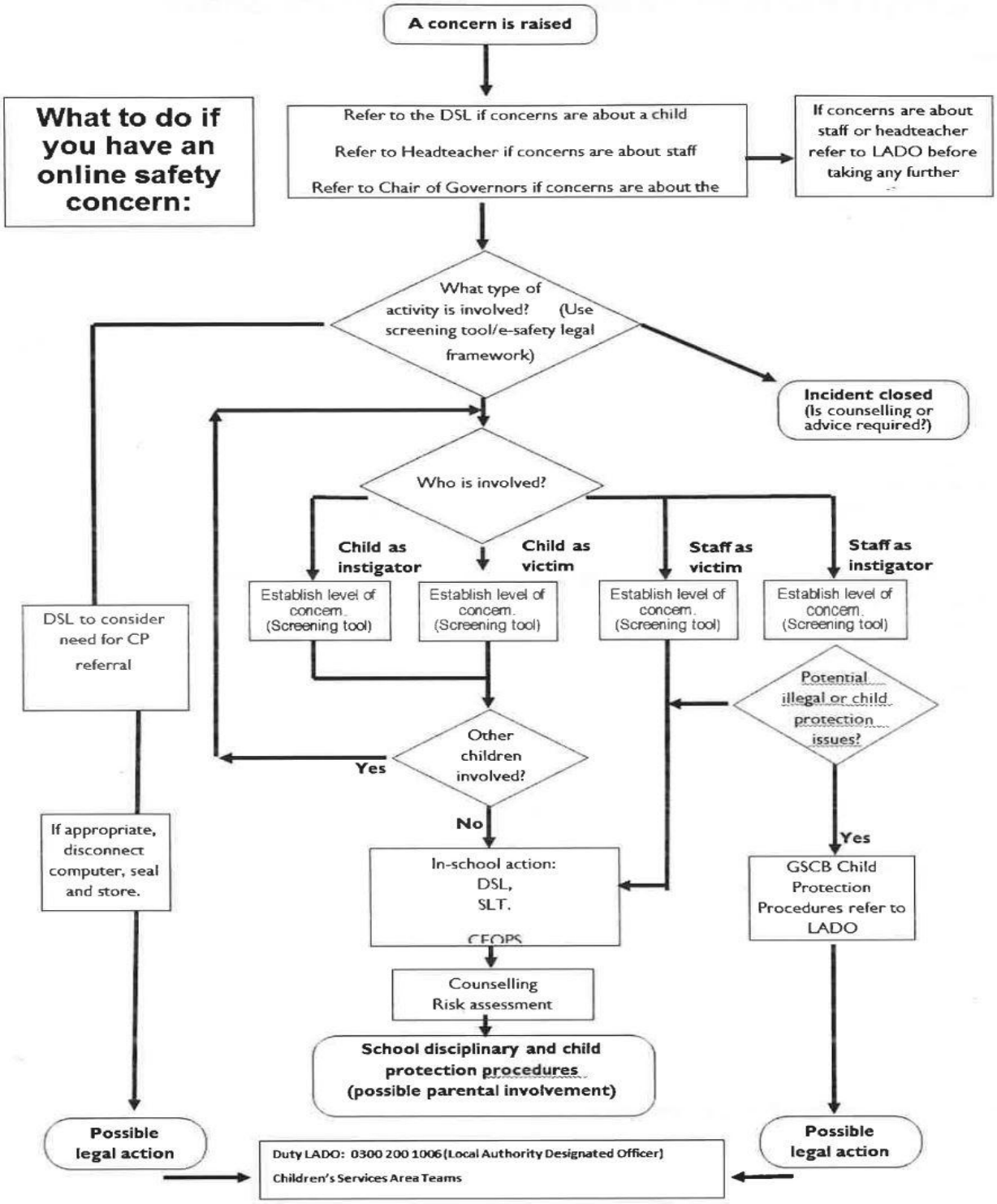
This policy is reviewed annually or at any other points needed throughout the year to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

43.0 Linked Policies

This policy also links to our policies on:

- Behaviour
- Trust code of conduct
- Whistleblowing
- Anti-bullying
- Health & Safety
- Complaints
- Attendance
- RSHE
- First Aid
- Supporting pupils with medical conditions
- Intimate Care
- Safer Recruitment

Appendix 1


A concern is raised
What to do if you have an online safety concern:
Refer to the DSL if concerns are about a child
Refer to Headteacher if concerns are about staff
Refer to Chair of Governors if concerns are about the
If concerns are about staff or headteacher refer to LADO before taking any further
What type of activity is involved? (Use screening tool/e-safety legal framework)
Incident closed (Is counselling or advice required?)
Who is involved?
Child as instigator
Child as victim
Staff as victim
Staff as instigator
Establish level of concern. (Screening tool)
Establish level of concern. (Screening tool)
Establish level of concern. (Screening tool)
Establish level of concern. (Screening tool)
DSL to consider need for CP referral
Potential illegal or child protection issues?
Other children involved?
Yes
No
If appropriate, disconnect computer, seal and store.
In-school action: DSL, SLT.
CEOPS
Yes
GSCB Child Protection Procedures refer to LADO
Counselling
Risk assessment
School disciplinary and child protection procedures (possible parental involvement)
Possible legal action
Duty LADO: 0300 200 1006 (Local Authority Designated Officer)
Children's Services Area Teams
Possible legal action

Appendix 2 - Trust DSL Job Description 2026

The Designated Safeguarding Lead (DSL) must be an appropriate senior member of staff, from the school or college leadership team. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post. Whilst deputies can carry out delegated activities, the ultimate lead responsibility remains with the designated safeguarding lead. The lead responsibility cannot be delegated.

Any deputies should be trained to the same standard as the (DSL), and the role should be explicit in their job description.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the three safeguarding partners
- liaise with the headteacher and inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- work closely with the School Business Manager to ensure all processes and procedures with regard as required,
- liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and

digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically

- liaise with the senior mental health lead and, where available, the mental health support team, here safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- 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 children's attendance, engagement and achievement at school or college. This includes:
- ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Training, Knowledge and Skills

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

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help, through family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online; and
- obtain access to resources and attend any relevant or refresher training courses.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Raise Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the Trust's child protection and safeguarding policy and procedures, especially new and part-time staff;
- ensure the Trust's child protection policy and safeguarding policy is linked back to school's systems and procedures, and these are updated and reviewed regularly.
- ensure the child protection and safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and school and college

leadership staff. Staff, should know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Information sharing and managing the child protection file

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in KCSiE, and the Trust's Safeguarding and Child Protection policy therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, 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 General Data Protection Regulation (UK GDPR); and,
- to be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

The designated safeguarding lead is responsible for ensuring that the electronic child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should:

- be detailed and accurate, either written or using appropriate online software, of all concerns and decisions made about a child even if there is no need to make a referral.
- include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome.

Records should only be accessed by those who need to see them. Where the file or content within it is shared, this happens in line with information sharing advice as set out in KCSiE and the Trust's policy.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and/or Teams or other such media is acceptable.

The designated safeguarding lead needs to ensure that they have arranged adequate and appropriate cover arrangements for any out of hours/out of term activities.

Appendix 3 - Further advice on child protection

Keeping Children Safe in Education 2026: KCSIE 26

NPCC: When to call the police

NSPCC: https://www.nspcc.org.uk/what-you-can-do/report-abuse/

NSPCC - Domestic-abuse Signs Symptoms and Effects

Childline: http://www.childline.org.uk/pages/home.aspx

CEOPS Thinkuknow: https://www.thinkuknow.co.uk/

Anti-Bullying Alliance: http://anti-bullyingalliance.org.uk/

Beat Bullying: http://www.beatbullying.org/

Childnet International making the internet a great and safe place for children. Includes resources for professionals and parents http://www.childnet.com/

Thinkuknow (includes resources for professionals and parents) https://www.thinkuknow.co.uk/

Safer Internet Centre http://www.saferinternet.org.uk/

GSCP: Gloucestershire Safeguarding Children Partnership

Appendix 4 - 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.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQI+	Lesbian, gay, bisexual, transgender and queer or questioning	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.

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.