East Midlands Education Trust

Safeguarding Policy

Kimberley Primary School

Review Date:	Autumn 2026	Reviewed and adopted by:	Trustees & Local Governing Body
Next Review Due:	Autumn 2027	Updated by:	D. Painton (EMET) R. Clarke (Kimberley Primary School)
Mid-reviews *(statutory):*			
Document Number:		*The information contained in this document is considered proprietary to East Midlands Education Trust in that these items and processes were developed at private expense. This information shall not be released, disclosed, or duplicated.*	

Contents

Key Safeguarding Contacts 3
1. Introduction 5
2. Legislation and guidance 5
3. Definitions 7
4. Equality statement 8
5. Roles and responsibilities 9
6. Information sharing, confidentiality and record keeping 13
7. Proactive work to keep pupils safe 15
8. School procedures 15
9. Training 18
10. Complaints 19
11. Monitoring and review 20
Appendix A: Definitions and indicators of abuse 21
Appendix B: Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) 24
Appendix C: Child-on-child abuse (including harassment and violence) 25
Appendix D: Domestic Abuse 27
Appendix E: So-called 'honour-based' abuse (including FGM and forced marriage) 28
Appendix F: Online safety 30
Appendix G: Sharing of nudes and semi-nudes, including those generated using AI 34
Appendix H: Preventing radicalisation 36
Appendix I: Children who are absent from education 38
Appendix J: Mental health 39
Appendix K: Children who are questioning their gender 41
Appendix L: Protocols for visitors to school 43
Appendix M: Safer recruitment procedures 44
Appendix N: Managing allegations against staff, supply staff, trainee teachers, volunteers and contractors 50
Appendix O: Police and Criminal Evidence Act (1984) – the role of the appropriate adult 58
Appendix P: Key 'staying safe' content from personal development programme 59

Key Safeguarding Contacts

School	
School's confidential safeguarding email address	safeguarding@kimberleyprimary.org
Designated Safeguarding Lead (DSL)	R.Clarke rclarke@kimberleyprimary.org /01159385050)
Deputy DSL(s)	C. Watson cwatson@kimberleyprimary.org K. Eardley keardley@kimberleyprimary.org H. Phimister (Before and after-school provision) hphimister@kimberleyprimary.org
Designated Governor for Safeguarding	N. Cobb ncobb@kimberleyprimary.org
Designated Teacher (DT) for Looked After Children (LAC)	J. Shelton jshelton@kimberleyprimary.org
Senior Mental Health Lead	R. Clarke rclarke@kimberleyprimary.org
Trusted Adult for LGBTQ+ Pupils	R. Clarke rclarke@kimberleyprimary.org
PREVENT Single Point of Contact (SPOC)	R. Clarke rclarke@kimberleyprimary.org
Senior Attendance Champion	C Watson cwatson@kimberleyprimary.org
IT Manager/School's IT Provider	ATOM IT
Local Authority (Nottinghamshire)	
Safeguarding Partnership Website	Nottinghamshire Safeguarding Children Partnership
Safeguarding Partner Lead	Zain Iqbal Zain.Iqbal@nottscc.gov.uk
Multi-Agency Safeguarding Hub (MASH)	0300 5008090
Emergency Duty Team (Children's Social Care)	0300 456 4546
Local Authority Designated Officer (LADO)	Submit a LADO contact form - Nottinghamshire County Council - Section 1
Virtual School Headteacher	Steph McGill virtual.school@nottscc.gov.uk
East Midlands Education Trust	
Trust Safeguarding Lead	Damian Painton dpainton@emet.uk.com
Chief Executive Officer	Paul Smith ceo@emet.uk.com
Chair of Trustees	Ann Witheford awitheford@emet.uk.com

Designated Trustee for Safeguarding	Ann Witheford awitheford@emet.uk.com

1. Introduction

1.1 All East Midlands Education Trust (EMET) schools aim to create a safe, caring and friendly environment for all pupils so that they can learn effectively, improve their life chances and achieve their full potential.

1.2 The Trust recognises its responsibilities for safeguarding children and protecting them from harm. All our children have equal rights to support and protection.

1.3 This policy and the Trust's safeguarding work is underpinned by four guiding principles:

- **Safeguarding is everyone's responsibility**: all employees, governors, trainees, volunteers and contractors have a responsibility to help identify concerns, share information appropriately and take prompt action.
- **We act in the best interests of the child**.
- **It could happen here**: everyone should be vigilant and avoid assumptions.
- **It might be something**: even the smallest concern may be one part of a bigger picture that reflects a child at risk of harm or being harmed.

1.4 This policy should be read in conjunction with the following policies:

Trust policies	School policies
• Complaints • Contact between staff and students • Equality • Health and safety • Restrictive interventions • RSE (relationships and sex education), health and wellbeing • SEND • Staff Code of Conduct • Supporting pupils with medical needs • Whistleblowing	• Accessibility plan • Alternative provision • Anti-bullying • Attendance • Behaviour (including suspensions and exclusions) • Curriculum • Drugs • Educational Visits • Lettings

1.5 This policy should be read in conjunction with the following local authority policies and documents:

- Pathway to Provision
- Children Missing in Education (CME) guidance
- Interagency safeguarding procedures

2. Legislation and guidance

2.1 This policy is based on the following Department for Education (DfE) statutory guidance:

- Keeping Children Safe in Education (2026)
- Working together to safeguard children (2026)

- Working together to improve attendance (2024)
- Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement (2026)
- Information sharing duty (2026)

2.2 This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils in school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- The Children's Wellbeing and Schools Act 2026, which includes a range of measures designed to safeguard children, support those in care and improve the overall quality of education.
- The Crime and Policing Act 2026, which was introduced to strengthen public safety, policing powers and measures against crime, including anti-social behaviour, offensive weapons, and national security threats.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics. This means our school should carefully consider how we are supporting their pupils with regard to these characteristics. The Act allows schools to take positive action to deal with particular disadvantages affecting pupils (where it can be shown to be proportionate). This includes making reasonable adjustments for disabled pupils.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps schools to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Data Protection Act 2018, which, alongside UK GDPR, controls how your personal information is used by businesses, organisations and the government.

- The Data (Use and Access) Act 2025, which updated the law around data protection, sharing and digital identity verification.

2.3 This policy also take consideration of the DfE's guidance for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation
- Protecting children from radicalisation

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

3. Definitions

3.1 **Safeguarding and promoting the welfare of children** means:

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

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

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

3.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

3.5 **Making or sharing of nudes and semi-nudes** refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'. Further information on this is in appendix G.

3.6 The term **children** refers to anyone under the age of 18.

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

- The chief officer of police for a police area in the LA

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

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

3.10 **Temporary off-site separation** is used when a pupil may require physically separating a pupil from one or other pupils on a short-term basis due to an allegation of harm by one pupil against another. In this situation, the school will temporarily forbid the pupil from attending the school premises. This does not constitute an exclusion on disciplinary grounds. Decisions on temporary off-site separations will be made on a case-by-case basis in line with the process set out in section 8 of this policy.

4. Equality statement

4.1 EMET has due regard to the Public Sector Equality Duty (PESD), which places a general duty on schools and colleges to have, in the exercise of their functions, due regard for the need to: eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under The Equality Act 2010); to advance equality of opportunity; and to foster good relations between those who share a relevant protected characteristic and those who do not.

4.2 Provisions in The Equality Act 2010 allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with specific disadvantages affecting pupils with a particular protected characteristic, such that their needs can be met. There may, therefore, be times when the school may consider positive action to support a group of pupils if there was evidence that they were being disproportionately affected by a particular safeguarding concern.

4.3 Some children have an increased risk of abuse, both online and offline. Additional barriers can exist for some children with respect to recognising or disclosing abuse. These can include:

- assumptions that indicators of abuse, such as behaviour, mood and injury relate to a child's condition or needs without further exploration
- these pupils being more prone to peer group isolation or bullying than others, without necessarily outwardly showing any signs
- communication barriers that prevent them from disclosing
- issues with cognitive understanding that mean they do not recognise what is happening to them is abuse
- the need for intimate care and greater dependence on adults for care

We are committed to ensuring that all children have the same protection, regardless of the barriers they may face.

4.4 We are alert to and give special consideration to children who:

- have a social worker (i.e. those on Child in Need and Child Protection plans)
- have special educational needs
- are disabled or have certain health conditions

- have English as an additional language (EAL)
- may experience discrimination due to a protected characteristic (including those who are gender questioning)
- are looked after in foster or residential care
- are previously looked after (such as those who have returned to their family from care, those who are adopted or those who are in kinship care, including special guardianship)
- are privately fostered
- are young carers
- are asylum seekers
- are known to be living in difficult situations (for example, in temporary accommodation or where there are issues such as substance abuse or domestic violence)
- have suffered a recent bereavement
- are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- are at risk due to either their own or a family member's mental health needs
- are missing or absent from education for prolonged periods and/or repeat occasions
- have experienced multiple suspensions and are at risk of, or have been, permanently excluded
- are educated in off-site alternative provision
- whose parent/carer has expressed an intention to remove them from school to be home educated
- are pregnant and where concerns about the welfare of the unborn child exist

We recognise that early identification is essential in ensuring that these pupils get the right support at the right time.

4.5 We recognise that additional barriers can

- have a social worker (i.e. those on Child in Need and Child Protection plans)
- have special educational needs

5. Roles and responsibilities

5.1 Safeguarding is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school. Our policy and procedures also apply to extended school and off-site activities.

5.2 The school plays a crucial role in preventative education. Our school is preparing pupils for life in modern Britain and promotes a culture in which there is zero tolerance of sexism, racism, misogyny or misandry, homophobia, biphobia, transphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This work is underpinned by our behaviour policy, the pastoral support we provide and our planned personal development programme. Further information on this is in section 7 of this policy.

5.3 **All staff** are responsible for:

- Reading and understanding the most up to date version of part 1 and annex A of the Department for Education's statutory safeguarding guidance, 'Keeping Children Safe in Education', and signing an annual declaration to that effect
- Knowing and understanding:
    - the contents of this policy and those that are listed in section 1.4
    - who the school's DSL and any deputy DSLs are
    - the school's systems for reporting safeguarding concerns about children (including how to use the MyConcern system)
    - the school's systems for reporting online safety incidents or matters relating to the school's monitoring and filtering systems
    - the Family Help assessment process and their role in it including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment
    - the processes for making referrals to local authority children's social care and for statutory assessments, including the role that they might be expected to play
    - the signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse, as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), FGM and radicalisation
    - new and emerging threats, including online harm and the role of technology and social media in presenting harm
    - that children can be at risk of harm inside and outside of their home, at school and online
    - that some groups of pupils are at greater risk of harm or could be targeted by other children, including pupils with special educational needs or those who are (or are perceived to be) LGBTQ+
    - the indicators of modern slavery and the procedures for identifying and reporting suspected cases
    - how their behaviours and actions can contribute to creating a positive culture in which any form of discrimination or bullying is not tolerated
    - how children missing in education are reported and how this information is acted upon
    - how to report a concern about an adult (including the headteacher) and the role of the local authority designated officer (LADO)
- Reporting all concerns in a timely manner using the school's procedures as set out in this policy and as communicated through other internal documentation and training
- Reinforcing the importance of online safety when communicating with parents and carers
- Providing a safe space for all pupils, including those who are LGBTQ+, to speak out and share concerns
- Reassuring victims that they are being taken seriously and that they will be supported and kept safe
- Adhering to the terms on the school's acceptable use of IT systems and the internet agreement
- Following the school's procedures

5.4 The **Designated Safeguarding Lead (DSL)** is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. Full details of the DSL's responsibilities are in their job description. In summary, the DSL is responsible for:

- Ensuring that they have up to date knowledge and undertake regular training to support them to undertake their role
- Ensuring that all staff have regular safeguarding training appropriate to their role (including how to report safeguarding concerns about both pupils and adults) and are provided with timely updates on safeguarding issues
- Providing advice and support to staff on child welfare and child protection matters
- Managing and quality assuring the safeguarding work of any deputy DSLs
- Communicating with staff across the school on individual cases, subject to appropriate levels of confidentiality
- Liaising with leaders responsible for overseeing the school's personal development programme to ensure that it responds to emerging safeguarding issues in the school community
- Understanding the filtering and monitoring systems in place in the school, and ensuring that there is a timely and proportionate response to any cases or events detected by these systems
- Liaising with local authority case managers and designated officers for child protection concerns as appropriate
- Taking part in strategy discussions and inter-agency meetings or supporting other staff to do so
- Contributing to the assessment of children on matters related to child welfare and child protection
- Acting as the key contact for external agency safeguarding notifications, including police Operation Encompass notifications
- Ensuring that safeguarding records are well organised, appropriately detailed and kept securely
- Referring suspected cases, as appropriate, to the relevant body (including local authority children's social care, the Channel programme, the Disclosure and Barring Service and the police) or providing support to staff who make such referrals directly
- Knowing what specialist support is available to help children and families, including those involved in sexual violence and sexual harassment (as either victim or alleged perpetrator)
- Keeping the headteacher and, as appropriate, other senior leaders informed of any issues

5.5 Whilst the activities of the DSL can be delegated to appropriately trained deputy DSLs, the lead responsibility for safeguarding and child protection remains with the DSL and will not be delegated. For the purposes of this policy, the school's **safeguarding team** refers collectively to the DSL and all deputy DSLs.

5.6 The **Prevent single point of contact (SPOC)** is a member of the school's senior leadership team. The SPOC takes lead responsibility for safeguarding in relation to protecting individuals in the school from radicalisation and involvement in terrorism. Full details of the SPOC's responsibilities are set out in their job description. In summary, the SPOC is responsible for:

- Ensuring that they have up to date knowledge and undertake regular training to support them to undertake their role
- Raising awareness of the role of school staff and ensuring they are provided with training in relation to protecting pupils from radicalisation and involvement in terrorism

- Monitoring the effectiveness of the school's wider curriculum on promoting community cohesion and tolerance of different faiths, beliefs and cultures
- Acting as the first point of contact in the school for case discussions relating to pupils who may be at risk of radicalisation or involvement in terrorism
- Collating relevant information, making any necessary prevent referrals through Channel and co-operating with agencies on any follow-up investigations
- Keeping the headteacher and, as appropriate, other senior leaders informed of any issues
- Liaising with the Virtual School, social workers and other professionals as appropriate, including ensuring that appropriate processes are in place to develop and review each LAC's personal education plan (PEP)

5.7 The **Designated Teacher (DT) for Looked After Children (LAC)** is responsible for:

- Ensuring that they have up to date knowledge and undertake regular training to support them to undertake their role
- Promoting the safety, wellbeing and educational outcomes of LAC or those who were previously LAC but have left the care system by way of adoption, kinship care, special guardianship order or child arrangement order
- Liaising with the Virtual School, social workers and other professionals as appropriate, including ensuring that appropriate processes are in place to develop and review each LAC's personal education plan (PEP)

Full details of the DT for LAC's responsibilities are set out in their job description.

5.8 The **School's IT provider (ATOM IT)** is responsible for:

- Putting in place an appropriate level of security protection procedures, including filtering and monitoring systems, on school devices and the school network and ensuring that these are reviewed and updated at least annually so that pupils are kept safe from potentially harmful and inappropriate content and contact online whilst at school
- Ensuring that the school's IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting weekly security checks on the school's IT systems
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that online safety incidents are logged so that they can be dealt with in line with this policy and the school's behaviour policy
- Conducting a formal review of filtering and monitoring effectiveness at least once every academic year (liaising with the DSL as necessary) and maintaining a record of these checks

5.9 The **Headteacher** is responsible for implementing this policy, including:

- Ensuring that all staff, including temporary staff, and volunteers are informed about the school's systems to support safeguarding as part of their induction
- Ensuring that all staff, including temporary staff, and volunteers, understand the procedures set out in this policy
- Ensuring that all staff, including temporary staff, and volunteers, know the identity of the DSL, any deputy DSLs, the Prevent SPOC and the DT for LAC

- Communicating this policy to parents and carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is adequate cover if the DSL is absent
- Ensuring that robust cover for DSL absence is in place, including the use of a confidential shared safeguarding email account to ensure concerns are acted upon without delay
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or a volunteer
- Making decisions regarding all low-level concerns, liaising with the DSL or other senior staff on individual cases as they deem appropriate
- Ensuring that records of concerns about members of staff or volunteers are well organised, appropriately detailed and kept securely
- Ensuring that, where relevant, all staffing ratios are met

5.10 The **Governing Body** is responsible for:

- Ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluating and approving this policy at each review, ensuring it complies with the law, and holding the headteacher to account for its implementation
- Being aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the school's local multi-agency safeguarding arrangements
- Appointing a link safeguarding governor to monitor the effectiveness of this policy in conjunction with the full Governing Body
- Ensuring that all staff undergo safeguarding and child protection training suitable for their role and in line with advice from safeguarding partners, and that such training is regularly updated
- Ensuring that the school has appropriate filtering and monitoring systems in place, and reviewing their effectiveness
- Ensuring that the school has procedures to manage any safeguarding concerns about staff members, supply staff, volunteers and contractors, including allegations that do not meet the harm threshold ('low level concerns')
- Reviewing and evaluating safeguarding data and information, including local authority and/or trust audits, on a regular basis

5.11 The **Chair of Governors** will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher. Further details on how the school manages allegations of abuse against adults, including the headteacher, are found in appendix N.

6. Information sharing, confidentiality and record keeping

6.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation. The school has powers to share, hold and use information for these purposes, and will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children.

6.2 All personal information will be processed fairly and lawfully in line with the school's duties under the Data Protection Act 2018, the data (Use and Access) Act 2025 and the UK General Data Protection Regulation (GDPR). Documents and records containing personal and sensitive information will be held securely, handled and retained in line with the EMET Data Protection policy.

6.3 All school staff must be aware that they have a statutory duty to share information with other agencies, including the police, in order to safeguard pupils or to ensure that they are provided with the early help and support they need. We recognise that the Data Protection Act 2018, the data (Use and Access) Act 2025 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to protect pupils. The school can share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or gaining consent would place a child at risk.

6.4 The school will maintain clear records whenever information is shared with external agencies. These records will include:

- what information was requested and by whom (including the original request form or communication)
- the lawful basis on which the information was shared
- what information was shared, who shared it, when it was shared, and the secure method used to share it

6.5 We also recognise that the Data Protection Act 2018, the data (Use and Access) Act 2025 and UK GDPR allow for occasions when withholding information is warranted because sharing it would put a child at risk of serious harm (e.g. where a child is affected by domestic abuse perpetrated by a parent or carer). This may include not releasing particular information in response to a subject access request (SAR).

6.6 However, individual members of staff should never promise a pupil that they will not tell anyone about a report of abuse, as this may not be in the pupil's best interests.

6.7 Where there is any doubt about the appropriateness of sharing information, the matter will be referred to the school's DSL, a deputy DSL or, in their absence, the Headteacher. They will take advice from the EMET data protection officer as required.

6.8 The school will make reasonable endeavours to ensure that all safeguarding concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Records will include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any actions taken, decisions reached and outcomes.

6.9 Safeguarding information will be stored in a separate child protection file for each pupil on the school's MyConcern system. This child protection file will include a chronology of significant events and information.

6.10 Referrals made to other agencies, including Children's Social Care, records relating to Child Protection plans or any other external agency support will also be recorded and stored on the child protection file.

6.11 The school will ensure that child protection records are kept confidential, with access to this information granted only on a need-to-know basis. This includes ensuring that security permissions are appropriately set on the school's MyConcern system. The school will also ensure that any legacy paper child protection records are kept in locked storage to which only selected individuals have access.

6.12 The DSL will ensure that, where a pupil leaves the school, their child protection file is transferred to the new school or college as soon as possible. This will be within five days for an in-year transfer or within the first five days of the start of a new term to allow the new school or college to have support in place for when the pupil arrives. The transfer will be made separately to the main pupil file and the DSL will ensure secure transit and that confirmation of receipt has been obtained.

6.13 The DSL may copy child protection records generated by the school, including the child protection chronology, prior to transfer and retain in line with the retention schedules set our in the EMET Data Protection policy, where there is justification for believing that the records may be required as evidence of the school's involvement with the child for statutory purposes.

7. Proactive work to keep pupils safe

7.1 The school recognises its responsibility, along with parents and carers, to provide education and guidance that enables pupils to keep themselves safe now and into the future. This work is predominantly undertaken through the school's personal development programme.

7.2 The design and content of the personal development programme is informed by guidance from the Department for Education (including statutory sex and relationships education guidance), the local authority and other relevant organisations. In developing and reviewing the programme, the school also considers local context, the needs of the pupil cohort and any emerging issues and learning from ongoing child protection work.

7.3 The personal development programme is delivered through PSHE sessions, assemblies and other events. Some aspects of online safety are also delivered through the school's computing curriculum. Training is provided to support those teachers who deliver these programmes. The school also uses external organisations and professionals to provide specialist input to some aspects of the programme.

7.4 The school's curriculum plans set out the core knowledge pupils learn and how this is sequenced. Appendix P provides a summary of the key concepts that pupils will learn.

7.5 Details on the school's approach to teaching relationships and sex education are set out in the RSE, Health & Wellbeing policy.

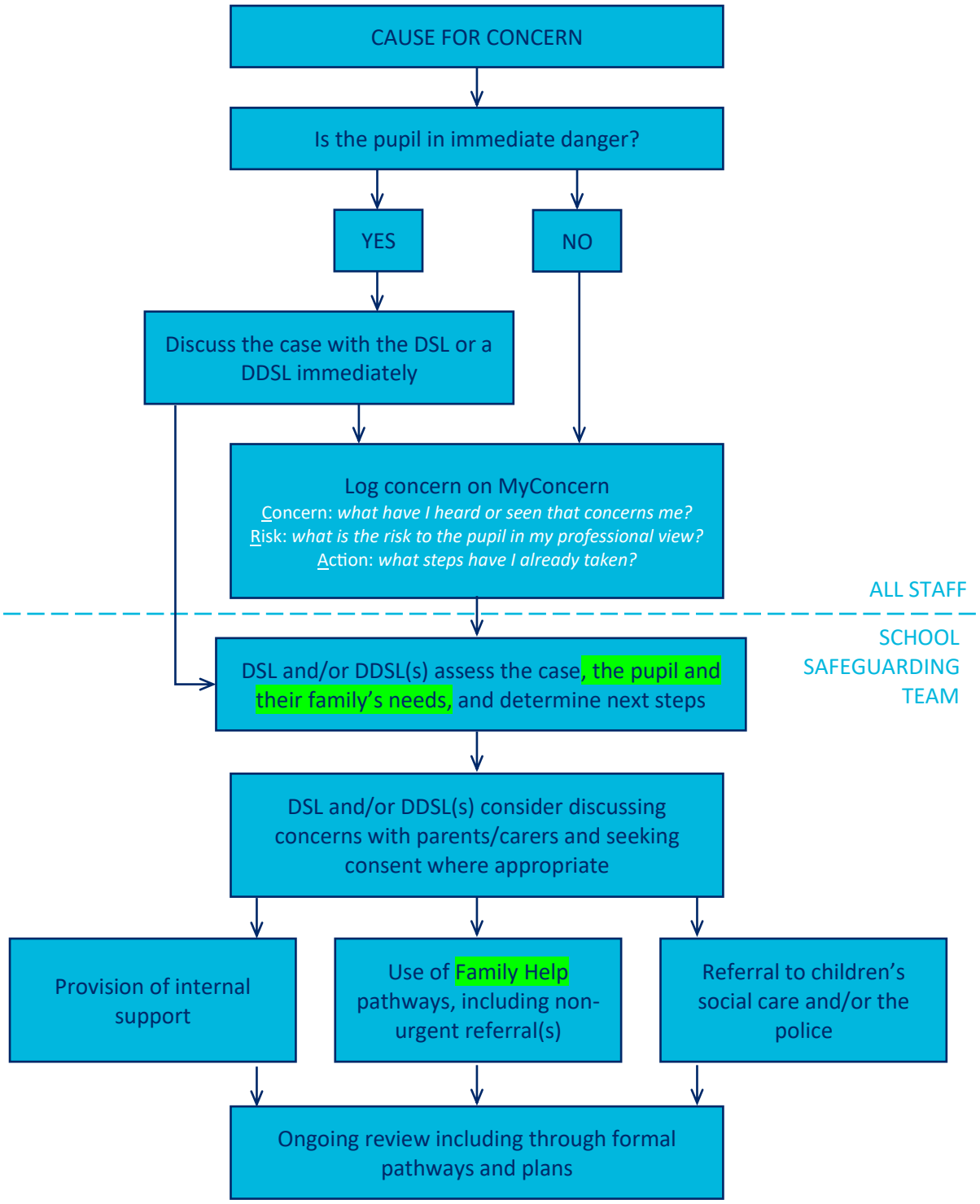
7.6 The school also identifies particular groups of pupils who may be at greater risk and provides additional proactive support to these pupils. This includes those groups of pupils identified in section 4.4 of this policy.

8. School procedures

8.1 Our staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation. In line with the guiding principles set out in section 1.3 of this policy, all staff will ensure that they remain vigilant to possible safeguarding concerns, particularly for pupils who may be more vulnerable (see section 4.4 of this policy for further information on some of these groups of pupils).

8.2 All members of staff will ensure that all concerns, however small, are reported in a timely manner using the procedures set out in this policy.

8.3 The process for reporting, assessing and acting upon concerns is summarised in the flowchart below.



8.4 If a pupil discloses a safeguarding issue to a member of staff, the member of staff:

- Will listen to and believe them
- Will allow them time to talk freely and avoid asking leading questions (staff will use the TED approach – 'tell me, explain to me, describe to me')
- Will stay calm and avoid showing the pupil that they are shocked or upset
- Will tell the pupil that they have done the right thing in telling a member of staff (and avoid telling the pupil that they should have told someone sooner)
- Will not make judgemental comments about what has happened or any alleged perpetrator
- Will explain what will happen next, that they will have to pass the information on and that they cannot keep information secret

- Will write up the conversation as soon as possible using the child's own words, ensuring that their account sticks to the facts and includes details of any questions that they asked the pupil
- Will ensure that their account of the disclosure includes descriptions of any physical injuries or annotated body maps that indicate the position and nature of physical injuries (no school staff should ever take photographs of injuries or marks unless explicitly directed to by the relevant authority)
- Will log all information on the school's MyConcern system and, in the event that a child is or may be in risk of immediate danger, speak immediately to the DSL or a deputy DSL (unless the concern involves an allegation against a member of staff, where information will be reported in line with the processes set out in appendix N)
- Will ensure that the matter is only discussed with the school's safeguarding team (or, in the case of an allegation against a member of staff, the appropriate case manager as set out in appendix N), children's social care, the Local Authority Designated Officer (LADO) or the police, unless directed otherwise by the relevant authority
- Will not follow up or deal with the disclosure themselves (unless they are the DSL, a deputy DSL or the assigned case manager for an allegation against a member of staff as detailed in appendix N)

8.5 The school recognises that some pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected. Some pupils may not recognise their experiences as harmful. They may feel embarrassed, humiliated or threatened because of their experiences or other vulnerabilities. This will not stop our staff from having 'professional curiosity' and raising concerns with the safeguarding team. Our staff will be especially mindful of pupils who are more vulnerable, including those who fall into the groups outlined in section 4.4.

8.6 If a member of staff is not able to discuss a concern with the DSL or a deputy DSL, but believes a pupil to be in immediate danger, the member of staff will make a referral directly to children's social care and/or the police. They will, at the earliest opportunity, inform the DSL or a deputy DSL that they have done so.

8.7 Whilst all school staff will speak to the DSL (or a deputy DSL) if they discover that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18, our teachers will adhere to the specific legal duty placed upon them and report the matter directly to the police themselves. We recognise that this information may have come to light either because a girl under the age of 18 has disclosed that an act of FGM has been carried out on her or because a member of staff observes physical signs that appear to show that an act of FGM has been carried out on a girl under the age of 18.

8.8 Whilst all school staff will speak to the DSL (or a deputy DSL) if they witness child sexual abuse or if child sexual abuse is reported to them, they will also adhere to the legal duty placed upon them and report the matter directly to the police themselves.

8.9 If the school deems that a temporary off-site separation is required, the school will ensure that:

- alternative separation options that allow the pupil to remain in school have been fully explored and that off-site separation is a reasonable and rational approach
- the school's duties under the Human Rights Act 1998 and Equality Act 2010 have been considered
- the DSL takes a lead role in the decision, using their professional judgement and, as required, taking advice from other agencies such as the police or children's social care
- the separated pupil's parents/carers are informed of the temporary off-site separation, the reasons for it and how the school intends to provide ongoing education and welfare support at the earliest opportunity (initially by telephone and then followed up in writing)

- the Trust's safeguarding lead is informed at the earliest opportunity
- the governing body is informed at the earliest opportunity
- other relevant agencies are informed
- the details, including the rationale for the decision and practical arrangements, are recorded clearly and a risk assessment is carried out
- the appropriate registration code is used for the duration of the temporary off-site separation
- arrangements are in place for daily welfare checks
- the pupil continues to receive an appropriate, full-time education
- the arrangements are reviewed on a daily basis to determine if and when it is appropriate to end the temporary separation arrangement
- an appropriate reintegration plan is formed when it is deemed appropriate for the temporary separation arrangement to end

8.10 It is not the role of school staff to carry out investigations into suspected child abuse by interviewing a pupil or any others involved. The school recognises that social care, the police and the NSPCC are the only bodies authorised to do so.

8.11 If any individual has concerns about a member of staff or an allegation is made about a member of staff posing a risk of harm to children, they will report it as follows:

Concern about	Reported to
Member of school staff (including supply staff, trainee teachers, volunteers and contractors)	Headteacher
Headteacher	Chair of Governors
Member of trust central staff	Chief Executive Officer
Chief Executive Officer	Chair of Trustees

8.12 Following a report as set out in section 8.9, the procedures set out in appendix N will be followed.

8.13 Where an individual believes there is a conflict of interest in reporting a concern or allegation about a member of staff as outlined in section 8.9, they will report is directly to the local authority designated officer (LADO).

8.14 If the school receives allegations relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow our school safeguarding procedures and will inform the LADO.

9. Training

9.1 All school staff, governors, trainee teachers and volunteers in our school receive training to equip them with the knowledge and skills to safeguard pupils. The nature of this training will vary according to the individual's role. The school maintains a record of all safeguarding training. All training is reviewed and updated regularly.

9.2 All staff, governors and volunteers undertake the following training:

Training	Frequency
Safeguarding children (level 2)	On induction then refreshed every two years
Prevent duty	On induction then refreshed every two years
School procedures (including using the MyConcern system)	On induction then updated annually and in the event of changes to school procedures
Statutory guidance including Keeping Children Safe in Education	Updated annually and in the event of other updates to statutory guidance

9.3 In addition, the school provides ongoing training and support to members of staff through briefings and staff meetings. This training will include topics related to:

- Changes in legislation, national guidance, local authority guidance or school procedures
- Learning from recent or ongoing cases
- Learning from local or Trust partnership working
- Emerging safeguarding issues in the school community, across the local area or nationally

9.4 Key staff, including the headteacher, the DSL and the deputy DSLs, undertake additional training to ensure that they have the knowledge and skills to discharge their additional duties in relation to safeguarding children. This includes (but is not limited to):

- Working together to safeguard children
- The roles and responsibilities of the DSL
- Prevent referrals
- Managing allegations

9.5 The Governing Body undertakes training that equips them with the knowledge they need to test and assure themselves that the safeguarding procedures in place are effective and support the delivery of a robust, whole-school approach to safeguarding. Governors also undertake training in relation to their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and local multi-agency safeguarding arrangements.

9.6 Representatives from the Governing Body, the headteacher and, as deemed appropriate by the Governing Body, other senior leaders and members of staff undertake safer recruitment training. This training is refreshed every two years.

9.7 Our DSL, deputies and other key staff involved in safeguarding work all have access to supervision appropriate to their role and needs. This supervision provides a structured space for reflection, support and professional development, ultimately enhancing our safeguarding practice and the quality of care provided to pupils.

10. Complaints

10.1 If any party has a concern or complaint over the implementation of this policy, they should raise their concerns with a staff member or the Headteacher, in accordance with the complaints policy.

10.2 If a member of staff, governor or volunteer working in our school has a concern about wrongdoing or malpractice, in relation to safeguarding or any other matter, it is important that they can raise this

concern without fear of victimisation, subsequent discrimination or disadvantage. The East Midlands Education Trust's whistleblowing policy sets out further details on raising such concerns.

11. Monitoring and review

11.1 The implementation of this policy will be monitored in each school by the Headteacher. Support and further monitoring will be provided by the trust central team as required.

11.2 This policy will be reviewed annually or in the event of changes to national legislation or statutory guidance.

Appendix A: Definitions and indicators of abuse

1. **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Extra-familial harms can include (but are not limited to) sexual abuse, domestic abuse in their own intimate relationships (including stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

2. There are four main types of abuse:

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

      - Multiple bruises in clusters, or of uniform shape
      - Bruises that carry an imprint, such as a hand or a belt
      - Bite marks
      - Round burn marks
      - Multiple burn marks and/or burns on unusual areas such as the back, shoulders or buttocks
      - An injury that is not consistent with the account given
      - Changing or different accounts of how an injury occurred
      - Bald patches
      - Symptoms of drug or alcohol intoxication or poisoning
      - Unaccountable covering of limbs, even in hot weather
      - Fear of going home or parents being contacted
      - Fear of medical help
      - Fear of changing for PE
      - Inexplicable fear of adults or over-compliance
      - Violence or aggression towards others including bullying
      - Isolation from peers

   b. **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve

seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. The following may be indicators of emotional abuse:

- Consistently describing themselves negatively (e.g. as stupid, naughty, hopeless or ugly)
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug, or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders
- Soiling, smearing faeces, enuresis
- Suddenly stopping communication ('traumatic mutism')

c. **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. Further information is in appendix C of this policy. The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness, or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling

- Frequent or openly masturbating, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area

d. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The following may be indicators of neglect:

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately dressed for the weather
- Poor attendance or often late
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for age-inappropriate activities such as cooking, ironing or caring for siblings
- Child is regularly not collected from school
- Child is left at home alone or with inappropriate carers

3. All staff are made aware of the types and indicators of abuse, neglect, exploitation and modern slavery through regular and role-appropriate training as outlined in section 9 of this policy.
4. Where a member of staff discovers or suspects that a child is the victim of abuse, they will follow the school's safeguarding procedures as outlined in section 8 of this policy.

Appendix B: Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

1. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

2. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time. It can range from opportunistic to complex, organised abuse. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

3. Indicators of CCE or CSE can include a child:

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

4. In addition, indicators of CSE can include a child:

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

5. If a member of staff suspects CCE or CSE, they will discuss this with the DSL and follow the school's safeguarding procedures as set out in section 8 of this policy. The DSL will trigger the local safeguarding procedures, including a referral to children's social care and the police, if appropriate.

Appendix C: Child-on-child abuse (including harassment and violence)

1. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online.

2. All staff should understand that, even if there are no reports in the school, it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to the DSL (or a deputy).

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

    a. bullying (including cyberbullying, prejudice-based and discriminatory bullying)

    b. abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

    c. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

    d. physical assault and harm, or the threat of harm with a weapon

    e. harmful sexual behaviour, including misogyny, sexual violence and sexual harassment (including sexual comments, remarks or jokes and online sexual harassment)

    f. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

    g. consensual and non-consensual sharing of nudes or semi-nudes

    h. upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm

    i. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

4. The school has a zero-tolerance approach to sexual violence and sexual harassment. The school recognises that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. All staff understand the importance of challenging inappropriate and potentially damaging behaviours between children, such as those listed above, that are abusive in nature. This includes behaviours that are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Such behaviours will not be downplayed or labelled as "banter", "just having a laugh", "part of growing up", "boys being boys" or similar. The school recognises the need to act to maintain a safe environment and avoid a culture in which these behaviours become normalised, and children do not come forward to report them.

5. The school will take a proactive approach to creating a culture of safe and healthy behaviours between pupils including through the school's behaviour curriculum and personal development programme. This includes recognising the escalatory nature of misogyny and ensuring that concerns are identified and acted upon early.

6. All staff will be provided with training to support their awareness and understanding of child-on-child abuse. The DSL and deputy DSLs will undertake training to ensure they have a good understanding of what constitutes harmful sexual behaviour and how to respond to reported cases.

7. The school will respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside the school premises and/or online. Whilst

recognising that decisions should always be made on a case-by-case basis, the school will act in line with the principles set out in Keeping Children Safe in Education and this policy.

8. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe. The needs and wishes of the victim will remain central in the work of the school. Support will be tailored on a case-by-case basis.

9. The school may decide that the children involved do not require statutory intervention but may benefit from Family Help. This can be particularly useful to address non-violent harmful sexual behaviour. Where a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to children's social care. Where a report of child sexual abuse (including sexual violence) is made, the school will report this to the police as well as to children's social care. Sexual violence (as defined under the Sexual Offences Act 2003) includes the following:

    - rape
    - assault by penetration
    - sexual assault
    - causing someone to engage in sexual activity without consent

10. The school will also ensure that the alleged abuser and any other pupils who may be involved are also supported. Actions taken by the school will balance this support with the need to safeguard the victim and protect the wider pupil body. The school will provide interventions and education designed to change behaviour and, as appropriate, make use of disciplinary sanctions. In deciding on the appropriate steps to take, the school will seek and act on advice from the police and children's social care.

11. The approaches taken will usually include conducting a risk assessment and introducing a plan for risk management. There may also be a victim support and/or safety plan drawn up. Reasonable measures to provide separation in school will form part of these plans. Where the school determined that this is not appropriate or possible, the decision may be taken to implement a temporary off-site separation arrangement as set out in section 8 of this policy. Plans will be reviewed and, as necessary, updated on a regular basis.

12. The school will work with parents and carers to plan and review the support provided to their children in these cases.

13. The school will, in response to any and all cases, consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies, providing extra staff training and/or adapting aspects of the school's curriculum could minimise the risk of it happening again. We will look for potential patterns of concerning, problematic or inappropriate behaviour and act where we identify any such patterns.

14. The school will also work with partners, including relevant local specialist support organisations, to help keep and make pupils feel safe.

Appendix D: Domestic Abuse

1. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
2. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
3. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
4. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
5. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
6. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day (via an Operation Encompass notification). The DSL will provide support according to the child's needs and update records about their circumstances.

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

1. So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.
2. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
3. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will initiate local safeguarding procedures.

Female genital mutilation (FGM)

4. The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
5. Section 8 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.
6. Indicators that FGM has already occurred include (but are not limited to):
    - A pupil confiding in a professional that FGM has taken place
    - A mother/family member disclosing that FGM has been carried out
    - A family/pupil already being known to social services in relation to other safeguarding issues
    - A girl:
        - Having difficulty walking, sitting or standing, or looking uncomfortable
        - Finding it hard to sit still for long periods of time (where this was not a problem previously)
        - Spending longer than normal in the bathroom or toilet due to difficulties urinating
        - Having frequent urinary, menstrual or stomach problems
        - Avoiding physical exercise or missing PE
        - Being repeatedly absent from school, or absent for a prolonged period
        - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
        - Being reluctant to undergo any medical examinations
        - Asking for help, but not being explicit about the problem
        - Talking about pain or discomfort between her legs
7. Potential signs that a pupil may be at risk of FGM include (but are not limited to):
    - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
    - FGM being known to be practised in the girl's community or country of origin
    - A parent or family member expressing concern that FGM may be carried out
    - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
    - A girl:
        - Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

Forced marriage

8. Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.
9. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
10. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL using the procedures set out in section 8 of this policy.
11. The DSL will:
    - Speak to the pupil about the concerns in a secure and private place
    - Initiate the local safeguarding procedures and refer the case to the local authority’s designated officer
    - Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
    - Refer the pupil for additional support and/or counselling as appropriate

Appendix F: Online safety

1. The school recognises the benefits that the online world can bring to pupils' learning and development. However, we have a role to play in educating our whole school community in the safe use of technology, including mobile technology and platforms that make use of artificial intelligence (AI).

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

   - **Content**: being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
   - **Contact**: being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
   - **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes or semi-nudes, sharing other explicit images aWHAnd online bullying
   - **Commerce**: risks such as online gambling, inappropriate advertising, phishing and/or financial scams

3. Pupils are taught about online safety as part of the curriculum. Further details are in section 7 and appendix P of this policy.

4. The school raises parents and carers' awareness of internet safety through newsletters and other communications home (Class Dojo), information on our website and parent information events. This includes informing parents:

   - What systems the school uses to filter and monitor internet use
   - What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online
   - About any emerging trends or risks in the technology or online platforms commonly used by young people
   - About things they can do to keep their child safe when using technology, including social media
   - Where parents can find out more or access further advice about online safety

Cyber-bullying

5. Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power.

6. To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and will encourage them to do so, including where they are a witness rather than the victim.

7. When an incident of cyber-bullying is reported, the school will follow the processes set out in our anti-bullying and behaviour policies.

8. Where illegal, inappropriate or harmful material has been spread amongst pupils, the school will use all reasonable endeavours to ensure that the incident is contained. The school will report the incident to the police and provide all relevant material to them if they have reasonable grounds to believe that

possessing that material is illegal. The school will also work with other external agencies if it is deemed necessary to do so.

Searching pupils and deleting content from devices

9. The headteacher, and any member of staff authorised to do so by the headteacher, can carry out a search before confiscating any electronic device that they have reasonable grounds for suspecting that one or more of the following is the case:
    - The device or its content poses a risk to staff or pupils
    - The device or its content is identified in the school's behaviour policy as a banned item for which a search can be carried out
    - The device or its content is evidence in relation to an offence
10. In our school, the members of staff authorised by the headteacher to carry out a search are the DSL and all members of the senior leadership team and safeguarding team. There may be occasions where the headteacher will authorise another member of staff to carry out a search; these decisions will be made on a case-by-case basis.
11. Any searching of pupils is carried out in line with:
    - The DfE's latest guidance on searching, screening and confiscation
    - UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people
    - Our behaviour policy
12. Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:
    - Make an assessment of how urgent the search is and consider the risk to other pupils and staff; if the search is not urgent, they will seek advice from the headteacher, the DSL or a deputy DSL
    - Explain to the pupil why they are being searched, how the search will happen and give them the opportunity to ask questions about it
    - Seek the pupil's co-operation
13. Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so. When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to do one or more of the following:
    - Cause harm
    - Undermine the safe environment of the school
    - Disrupt teaching
    - Commit an offence
14. If inappropriate material is found on the device, the staff member who conducted the search will liaise with the DSL (or a deputy DSL) and/or the headteacher to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.
15. When deciding if there is a 'good reason' to erase data or files from a device, the school will consider if the material may constitute evidence relating to a suspected offence. In these instances, material will

not be deleted, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if they reasonably suspect that its continued existence is likely to cause harm to any person or if the pupil and/or the parent or carer refuses to delete the material themselves.

16. If a staff member suspects a device may contain an indecent image of a child (also known as self-generated intimate imagery), they will not view the image. They will confiscate the device and report the incident to the DSL (or a deputy DSL) immediately, who will decide what to do next. The safeguarding team will make the decision in line with the guidance outlined in section 11 of this appendix.

Use of the school's IT systems (including filtering and monitoring)

17. The school's IT systems are only to be used for educational purposes or for the purposes of fulfilling the duties associated with an individual's role in the school.

18. All the users of the school's IT systems and network, including visitors, will be expected to adhere to our terms of acceptable use. These terms are published on the school's website.

19. The school is a mobile phone-free environment by default. Pupils are not permitted access to mobile phones during the school day, including lessons and breaktimes, except by explicit exception from the Headteacher. Further details are available in our behaviour policy.

20. Members of staff are permitted to use school devices outside of school in the discharge of their role. When using school devices, our staff will:

    - Keep devices password-protected and follow the school's password policy
    - Ensure that their hard drive is encrypted so that, should the device be lost of stolen, nobody can access the files stored on it
    - Make sure that the device locks if left inactive for a period of time
    - Not share the device with family or friends
    - Ensure that anti-virus and anti-spyware software is installed and up to date
    - Ensure that operating systems are kept up to date by installing the latest updates in a timely manner
    - Not use their device in any way that would violate the school's terms of acceptable use
    - Only use their device for work activities
    - Report any concerns about the security of their device to the school's IT provider immediately

21. Members of staff will never save information, including images, related to pupils on a personal device. Further guidance on the staff use of personal devices is provided in the staff code of conduct.

22. The school will restrict access through filtering systems that are designed to protect users, particularly pupils, from harmful content. The school's filtering systems comply with the standards set out by UKCIS. Details of the school's filtering system are in section 24 below.

23. The school will monitor the websites visited and applications used by all users of the school's IT systems and network (including those who connect devices to the school's wi-fi network) to ensure that their use complies with our terms of acceptable use. Details of the school's monitoring system are in section 24 below. Any concerns raised through monitoring will be addressed using the procedures set out in section 8 and appendix N of this policy together with the procedures set out in our behaviour policy.

24. The school's systems for monitoring and filtering are detailed below. These are kept under regular review. Reviews are supported by consultation with the trust IT team and external, expert partners.

Filtering	Securely
Monitoring	Securely

Platforms that use generative artificial intelligence (AI)

25. The school recognises the many benefits that the use of generative AI (AI that generates content based on a user's instruction or prompt) can bring to pupils' learning and in reducing workload for members of staff.

26. However, we recognise that the use of generative AI brings risks including (but not limited to):

    - Pupil exposure to inappropriate or harmful content
    - Pupil exposure to inaccurate, misleading or biased content
    - Data protection breachers
    - Intellectual property infringements
    - Academic integrity and other ethical challenges

27. Before utilising a generative AI tool, our staff will ensure that the tool:

    - Prevents access to harmful or inappropriate content
    - Is subject to the school's filtering and monitoring systems
    - Logs activity, alerts supervisors about harmful content and provides real-time notifications when content is blocked
    - Complies with GDPR including having clear privacy notices and collecting, processing and storing data lawfully
    - Does not collect, store or use intellectual property (such as pupil- or staff-created work) for commercial purposes without explicit consent

28. School staff will not enter pieces of pupils' personal or sensitive data into any generative AI tool that sits outside the school's secure, user-authenticated systems.

29. The school's IT provider and the trust IT team will support the school by checking and approving generative AI tools for staff and/or pupil use. However, the school recognises that the number of available tools is growing exponentially. As such, training will be provided to staff to support them with the knowledge and skills needed to make safe and appropriate use of new generative AI tools.

30. Pupils will be taught about the benefits and risks of generative AI through the school's personal development programme. Further details are in section 7 and appendix P of this policy.

Appendix G: Sharing of nudes and semi-nudes, including those generated using AI

1. All adult-involved intimate image sharing incidents (including those generated using AI, such as deepfakes) are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child sharing of self-generated intimate images or videos, it may be difficult to initially assess adult involvement.

2. There are two types of common adult-involved incidents:

   a) Sexually motivated incidents

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

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

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

   b) Financially motivated incidents

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

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

   Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them. They may use images that have been stolen from the child or young person taken through hacking their account. They may use digitally manipulated images, including AI-generated images, of the child or young person.

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

3. Potential signs of adult-involved grooming and coercion (including financially motivated sexual extorsion) can include the child or young person being:

   - Contacted by an online account that they do not know but appears to be another child or young person (this could be done through hacking of the account of another child or young person)
   - Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
   - Moved from a public to a private/E2EE platform

- Coerced/pressured into doing sexual things, including creating nudes or semi-nudes, including through the use of AI
- Told they have been hacked and that the individual has access to their images, personal information and contacts
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity, sending money or sharing bank account details. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Appendix H: Preventing radicalisation

1. **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
2. **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
    - Negate or destroy the fundamental rights and freedoms of others
    - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights
    - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
3. **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people
    - Causes serious damage to property
    - Seriously interferes or disrupts an electronic system
4. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
5. Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.
6. We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
7. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home. Further details on our approach to this are outlined in appendix F.
8. There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. Signs that a pupil is being radicalised can include (but are not limited to):
    - Refusal to engage with, or becoming abusive to, peers who are different from themselves
    - Becoming susceptible to conspiracy theories and feelings of persecution
    - Changes in friendship groups and appearance
    - Rejecting activities that they used to enjoy
    - Converting to a new religion
    - Isolating themselves from family and friends
    - Talking as if from a scripted speech
    - An unwillingness or inability to discuss their views
    - A sudden disrespectful attitude towards others
    - Increased levels of anger
    - Increased secretiveness, especially around internet use
    - Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

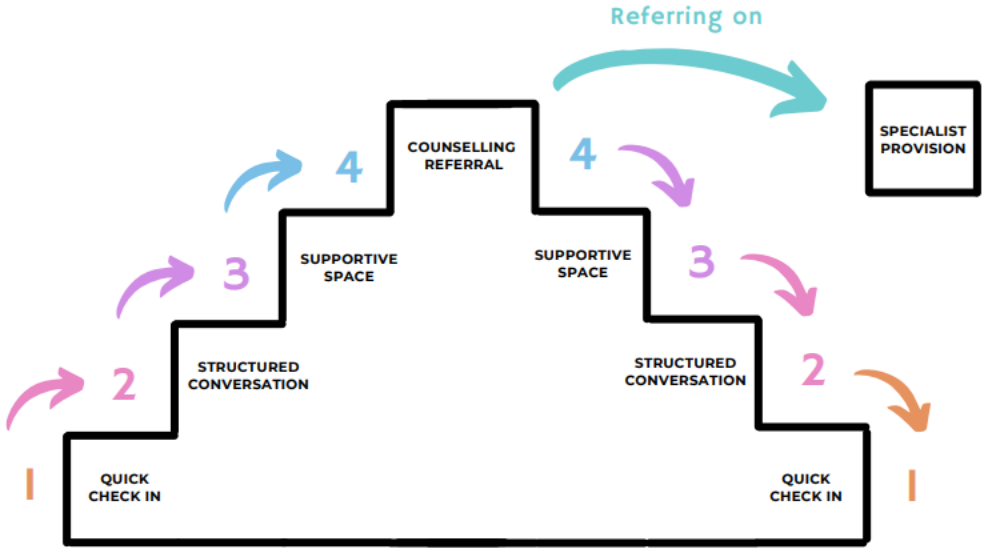
9. Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour; staff should have confidence in their instincts and seek advice if something feels wrong.
10. If staff are concerned about a pupil, they will follow our procedures set out in section 8 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Appendix I: Children who are absent from education

1. A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
2. There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:
    - Are at risk of harm or neglect
    - Are at risk of forced marriage or FGM
    - Come from Gypsy, Roma, or Traveller families
    - Come from the families of service personnel
    - Go missing or run away from home or care
    - Are supervised by the youth justice system
    - Cease to attend a school
    - Come from new migrant families
3. We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named. It also includes adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
4. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.
5. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Appendix J: Mental health

1. We have an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. We also acknowledge that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-herm, suicidal ideation or risk of suicide.
2. We have systems in place for identifying potential mental health problems. In order to support pupils, we seek advice from external agencies where appropriate, and will refer pupils for additional support where required. This includes making referrals to the EMET counselling service.
3. Our school has a **Senior Mental Health Lead**. This is the senior member of staff who leads the school's work on mental health and wellbeing. They are supported by H. Phimister. The Senior Mental Health Lead's responsibilities include:
    - Overseeing the development of mental health and wellbeing provision in our school (in line with government guidance)
    - Developing our approach to early intervention and support
    - Working with other leaders to ensure that our curriculum, personal development programme and wider offer promotes and supports positive mental health and wellbeing
    - Ensuring that our staff receive regular training on mental health and wellbeing relevant to their role
    - Championing and promoting staff wellbeing
4. Our school follows the EMET graduated response to supporting pupils' mental health and wellbeing.



5. Our staff will never attempt to make a diagnosis of a mental health problem, for which they do not have the appropriate training. However, they will use their day-to-day observations of pupils to identify those whose behaviour suggests that they might be experiencing a mental health problem or be at risk of developing one. Our staff will be particularly aware of some of the potential warning signs, including:
    - significant changes in behaviour
    - ongoing difficulty sleeping
    - withdrawing from social situations
    - not wanting to do things they usually like

- physical signs of self-harm or neglecting themselves

Appendix K: Children who are questioning their gender

1. We recognise that, in recent years, there has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. It is common for children to engage in activities that are less typically associated with their sex. Sometimes, young children go through a period of questioning their gender but, for the majority, this will not continue into adulthood. However, we recognise that a small proportion may continue to question their gender and that this feeling may intensity into puberty.

2. We acknowledge that it is not our place to initiate any action in this area but that we have a duty to respond where a child or their parent raises a request relating to social transition. This is part of our duty of care to our pupils. Our staff will take the time to understand the thoughts and feelings of children who are questioning their gender, be appropriately professionally curious about the full range of the child's experiences and be aware of their potential vulnerabilities, including the possibility of complex mental health needs relating to relationships with family, peers or their broader social environment. This includes being particularly alert to potential discriminatory bullying, to which the school has a zero-tolerance approach.

3. Whilst we will be conscious of the rights of pupils or staff in relation to their religion or beliefs, we will appropriately sanction any cases of bullying or harassment.

4. We will take reasonable steps to adopt policies across our school that maintain flexibility and avoid rigid rules based on gender stereotypes.

5. Our staff will not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers. Where a child or their parent makes a request relating to social transition, we will:

    - remain focused on acting in the best interests of the child (even where this may differ to the child's wishes)
    - consider everything that could be affecting the child, including any wider health issues or neurodiversity
    - take account of the impact of any actions on the child and their peers
    - remain aware of the additional risks associated with children who socially transition before puberty or before receiving clinical advice, particularly where this involves a child 'living in stealth' and ensure the DSL is involved in these cases
    - consider any clinical evidence available to us and, where appropriate, seek non-clinical advice (e.g. from the SENDCo)
    - support the child in a non-directive way, keeping options open and flexible
    - not provide any clinical advice (for which our staff have not received the appropriate training)
    - engage with parents and carers, treating their views with importance
    - identify a key worker to support the child and, where appropriate, speak to parents or carers on the child's behalf
    - keep records of the actions we take and the reasons for decisions
    - continue to record biological sex accurately on school records

6. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, our staff will liaise with the DSL to determine the appropriate actions that need to be taken to safeguard the child before parents are contacted or any decisions are taken.

7. We will ensure that, in all our work supporting children who are questioning their gender, we comply with our duties under the Equality Act 2010 and the Human Rights Act 1998. This includes:

   - not allowing pupils into toilets or changing rooms designated for the opposite sex
   - where single-sex sports provision exists for safety reasons, not allowing pupils to participate in sports provision (including PE) designated for the opposite sex
   - ensuring that our policies and procedures do not place any child who is questioning their gender at a disadvantage relative to other children

8. We will take the time to explain sensitively to a child who is questioning their gender (and to their parents) the aspects outlined in section 7 above.

9. All decisions regarding a child who is questioning their gender will be kept under regular review. This will allow the school to consider any changes in the child's circumstances (including situations in which the child wants to fully or partially reverse a request that has previously been agreed) but also the impact on the school's resources. Any reviews will consider the views of the child, the child's parents and the school's DSL as well as the advice received from relevant professionals.

Appendix L: Protocols for visitors to school

1. All visitors to school will be required to verify their identify to the satisfaction of staff. If the visitor is unknown to the school, we will check their credentials and reason for visiting before allowing them to enter the school.
2. Visitors who will be working unaccompanied in a professional capacity on the school site or with our pupils will be expected to show school staff their enhanced DBS certificate for checking. Alternatively, the organisation on whose behalf the professional is working (e.g. the local authority) will provide prior written confirmation that an appropriate level of DBS check has been carried out and does not raise any concerns about the individual's suitability to work with children. In all cases, the visitor's photographic ID will be checked.
3. Visitors are expected to sign in using the school's electronic sign-in system and wear a visitor badge. Those who have been cleared to work unsupervised will be given a badge that indicates this. All other visitors, including guest speakers, will be accompanied by a member of staff at all times.
4. We will not invite into school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using the school's facilities is not seeking to disseminate extremist views or radicalise pupils or staff. This may require visitors to provide copies of presentations and/or other materials in advance for checking.
5. Contractors and other individuals who visit the school regularly shall be entered onto the school's single central record. Further information on this is in appendix M of this policy.
6. The school does not tolerate threatening, abusive or violent behaviour. No pupil, member of staff, governor or visitor to the school should be made to feel uncomfortable by the behaviour of a visitor to the school. The school reserves the right to ban individuals whose behaviour is deemed unacceptable from the school premises, including a parents or carer. Bans would usually be reviewed after 6 months. Where the school chooses to ban a parent or carer from the school site, we would take reasonable steps to maintain contact and ensure that the individual is kept fully informed about their child's progress in school.

Appendix M: Safer recruitment procedures

Our safer recruitment procedures are supported by a recruitment toolkit.

1. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put a range of steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

2. When advertising roles, we will make clear:

    - Our school's commitment to safeguarding and promoting the welfare of children
    - That safeguarding checks will be undertaken
    - The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
    - Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

3. Our application forms will:

    - Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
    - Include a copy of, or link to, our safeguarding policy and our policy on the employment of ex-offenders
    - Advise applicants that they will need to complete a criminal records self-declaration prior to interview

Shortlisting

4. Our shortlisting process will involve at least two people and will:

    - Consider any inconsistencies and look for gaps in employment and reasons given for them
    - Explore all potential concerns

5. Once we have shortlisted candidates, we will ask shortlisted candidates to:

    - Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
        - If they have a criminal history
        - Whether they are included on the barred list
        - Whether they are prohibited from teaching
        - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
        - Any relevant overseas information

- Sign a declaration confirming the information they have provided is true

6. We will also consider carrying out a search (via online search engine) on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

7. We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

8. When seeking references, we will:

   - Not accept open references
   - Liaise directly with referees and verify any information contained within references with the referees
   - Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal (or equivalent) as accurate in respect to the candidate's suitability to work with children and any disciplinary warnings (including those that are time expired but relate to safeguarding children and the candidate's suitability for the post)
   - Obtain verification of the candidate's most recent relevant period of employment (including reasons for leaving) if they are not currently employed
   - Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
   - Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
   - Resolve any concerns before any appointment is confirmed

Interview and selection

9. We will ensure that every interview panel has a member of staff or governor who has completed safer recruitment training. Further details of training are in section 9 of this policy.

10. When interviewing candidates, we will:

    - Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
    - Explore any potential areas of concern to determine the candidate's suitability to work with children
    - Record all information considered and decisions made

Pre-appointment vetting checks

11. We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

12. Individuals will be involved in **regulated activity** if, as a result of their work or volunteering, any of the following apply to them:

    - They are responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children

- They are engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

13. For all **new staff**, all offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

    - Verify their identity
    - Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity. We will obtain the certificate before or as soon as practicable after appointment, including when using the DBS update service. Individuals may join the DBS update service at application or within 30 calendar days of certificate issue. We will not view a copy of the certificate but will not keep a copy. We will keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
    - Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available or where an individual has worked in a post in a school or college that brought them into regular contact with children or young people which ended more than three months prior to that person's appointment to the school
    - Verify their mental and physical fitness to carry out their work responsibilities, usually through our occupational health provider
    - Verify their right to work in the UK using acceptable documents as set out in the Government's Employers' Right To Work Checklist and keeping a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
    - Verify their professional qualifications, as appropriate
    - Ensure they are not subject to a prohibition order if they are employed to be a teacher or in 'teaching work' as set out in section 3 of The Teachers' Disciplinary (England) Regulations 2012:
        - Planning and preparing lessons and courses for pupils
        - Delivering lessons to pupils
        - Assessing the development, progress and attainment of pupils
        - Reporting on the development, progress and attainment of pupils
    - Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK for three consecutive months or more in the last ten years. These could include, where available, criminal records checks for overseas applicants and obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
    - Carry out English fluency checks in line with the requirements set out by immigration and right to work regulations.
    - Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state (this will apply to the headteacher, senior leaders and any middle leaders or support staff who have responsibility for managing a school budget)
    - We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file.

This will include our evaluation of any risks and control measures put in place, and any advice sought.

14. In any circumstances where there is an unavoidable delay in the completion and evaluation of checks (including the provision of references), a risk assessment will be completed. This will support school leaders to consider whether, with additional controls measures (e.g. working under supervision), an individual can undertake their work in the school. External advice will be used to support this process as required. Any risk assessment will be kept under regular review.

15. In certain circumstances we will carry out all the relevant checks on **existing staff** as if the individual was a new member of staff. These circumstances are when one or more of the following is the case:

    - There are concerns about an existing member of staff's suitability to work with children
    - An individual moves from a post that is not regulated activity to one that is or the nature of their contact with children changes
    - There has been a break in service of 12 weeks or more

16. Existing staff are required to inform the school if they become subject of a police investigation or receive any caution or conviction that is not protected under the amendments to the Rehabilitation of Offenders Act 1974.

17. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where any of the following are the case:

    - We believe the individual has engaged in relevant conduct
    - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
    - We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
    - The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

18. We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

19. We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

20. An enhanced DBS check with barred list information for contractors engaging in regulated activity

21. An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity, but whose work provides them with an opportunity for regular contact with children

22. We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

23. For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

24. Where applicants for initial teacher training are employed by us, we will ensure that all necessary checks are carried out in line with section 12 of this appendix.

25. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

26. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

27. We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity (even if they are supervised in this activity by school staff)
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.
- **Governors, trustees and members**

28. All governors, trustees and members will have:

- An enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state.
- A section 128 check
- An identity check
- A check on their right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings used by the school

29. Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. We will also ensure that providers notify us of any staffing changes. Further details of the checks made on alternative providers are set out in our alternative provision policy.

Adults who supervise pupils on work experience

30. When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

31. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

32. Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

33. Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit. We will ensure that parents are made aware of the agreed arrangement.

Appendix N: Managing allegations against staff, supply staff, trainee teachers, volunteers and contractors

PART 1: Allegations that may meet the harm threshold

Our procedures for managing allegations are supported by a disciplinary toolkit.

1. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has done any of the following:
    - 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 they may pose a risk of harm to children
    - Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
2. If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).
3. We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
4. A 'case manager' will lead any investigation. The case manager will be identified at the earliest opportunity.

Subject of allegation	Case manager
Member of school staff (including trainee teachers, supply and contracted staff)	Headteacher (or appointed senior member of staff)
Headteacher	Chair of Governors (or appointed trust senior leader)
Member of central trust staff	Chief Executive Officer (or appointed trust senior leader)
Chief Executive Officer	Chair of Trustees (or appointed trustee)

5. Our procedures for dealing with allegations will be applied with common sense and judgement.
6. If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding procedures and inform the LADO.

Suspension of the accused until the case is resolved

7. Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.
8. Based on an assessment of risk, we will consider alternatives such as:
    - Redeployment within the school so that the individual does not have direct contact with the child or children concerned
    - Providing an assistant to be present when the individual has contact with children

- Redeploying the individual to alternative work so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust

9. If in doubt, the case manager will seek views from the school's HR business partner and the LADO, as well as the police and local authority children's social care where they have been involved.

Possible outcomes for allegation investigations

10. There are five possible outcomes to allegation investigations:
    - **Substantiated**: there is sufficient evidence to prove the allegation
    - **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
    - **False**: there is sufficient evidence to disprove the allegation
    - **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
    - **Unfounded**: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

11. In the event of an allegation may meet the criteria set out in section 1 above, the case manager will take the following steps:
    - Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
    - Make a referral to the LADO. This is to support the case manager to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care. The case manager may, on occasion, consider it necessary to involve the police before consulting the LADO (for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will refer the case to the LADO as soon as practicably possible after contacting the police.
    - Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after receiving feedback from the referral to the LADO (and the police or local authority children's social care, where necessary). Where the police and/or local authority children's social care are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
    - Subject to LADO feedback, and where basic enquiries do not clearly demonstrate that an allegation is false or unfounded, an investigation will be undertaken in line with our disciplinary policy.
    - Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified (including whilst the case manager awaits feedback from a LADO referral) or whether alternative arrangements

such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or local authority children's social care, as appropriate.

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care.
- If immediate suspension is considered necessary, the case manager will agree and record the rationale for this with the LADO, taking advice and support from the HR business partner as required. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, and the individual will be given a named contact at the school or trust, along with their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, this decision and the justification for it will be recorded and it will be agreed with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, steps will be taken as agreed with the LADO to initiate the appropriate action in school. There will be liaison with the police and/or local authority children's social care as appropriate.
- The case manager will ensure that effective support is provided for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. This will include signposting the individual to external support services and employee assistance schemes.
- If individual resigns, all processes will continue in line with policy, with the individual concerned given all reasonable opportunities to engage with it.

12. We will inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice. We will keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
13. We will make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
14. We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
15. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
16. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

17. If there are concerns or an allegation is made against someone not directly employed by the school, such as a trainee teacher, supply teacher or contracted staff member provided by an agency or training provider, we will take the actions below in addition to our standard procedures:
    - We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
    - The case manager will discuss with the agency or training provider whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
    - We will involve the agency or training provider fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
    - We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
18. When using an agency or training provider, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.
19. We will deal with all allegations as quickly and effectively as possible. However, the school recognises that, in cases where other agencies are involved, this may elongate timescales.

Specific actions

20. *Action following a criminal investigation or prosecution:* The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.
21. *Conclusion of a case where the allegation is substantiated:* If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.
22. *Individuals returning to work after suspension:* If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.
23. *Unsubstantiated, unfounded, false or malicious allegations:* If an allegation or report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality, information-sharing and record keeping

24. The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. All reasonable steps will be taken to ensure that no matter relating to the subject to the investigation will be included in any publications if it is likely to lead to members of the public identifying that individual as the subject of the investigation. However, the school will have due regard to any court order dispensing such restrictions.

25. The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

    - Who needs to know about the allegation and what information can be shared
    - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
    - What, if any, information can be reasonably given to the wider community to reduce speculation
    - How to manage press interest if, and when, it arises

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

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

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

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

29. In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate. We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

30. When providing employer references, we will:

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

Learning lessons

31. After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

    - Issues arising from the decision to suspend the member of staff

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

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

Non-recent allegations

33. Abuse can be reported, no matter how long ago it happened.
34. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
35. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

PART 2: Concerns that do not meet the harm threshold

36. This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in part 1 above.
37. Concerns may arise through, for example:
    - Suspicion
    - Complaint
    - Safeguarding concern or allegation from another member of staff
    - Disclosure made by a child, parent or other adult within or outside the school
    - Pre-employment vetting checks
38. We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

39. The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:
    - Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
    - Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
40. Examples of such behaviour could include (but are not limited to):
    - Being overly friendly with children
    - Having favourites
    - Taking photographs of children on their mobile phone
    - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
    - Humiliating pupils

Sharing low-level concerns

41. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. We will create this culture by:

    - Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
    - Empowering staff to share any low-level concerns as set out in section 8 of this policy
    - Empowering staff to self-refer
    - Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
    - Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
    - Helping to identify any weakness in the school's safeguarding systems

Responding to low-level concerns

42. If the concern is raised via a third party, the headteacher (or an appointed senior member of staff) will collect evidence where necessary by speaking:

    - Directly to the person who raised the concern, unless it has been raised anonymously
    - To the individual involved and any witnesses

43. The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may collaborate with the DSL or other relevant senior staff.

44. Where the concern raised is about the headteacher, the actions in sections 42 and 43 above will be carried out by the Chair of Governors or an appointed trust leader.

45. Where the concern raised is about a member of central trust staff, the actions in sections 42 and 43 above will be carried out by the Chief Executive Officer or an appointed trust leader

Record keeping

46. All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

47. Records will be:

    - Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
    - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in part 1 of this appendix, we will refer it to the LADO.
    - Retained at least until the individual leaves their employment at the school

48. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

49. We will not include low-level concerns in references unless one or more of the following applies:

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix C: Police and Criminal Evidence Act (1984) – the role of the appropriate adult

1. The school is aware of the requirement for children to have an appropriate adult when in contact with police officers who suspect them of an offence.
2. The Police and Criminal Evidence Act (PACE) 1984 states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this code and any other code. PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.
3. The DSL (or a deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on the school's MyConcern system. If, having been informed of the vulnerabilities, the school does not feel that the officer is acting in accordance with PACE, they will speak with a supervisor or contact 101 to escalate these concerns.
4. Where there are grounds to suspect a person of an offence, the individual must be cautioned before being questioned about that offence by the police. A police officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.
5. The 'appropriate adult' means, in the case of a child:
    - the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation
    - a social worker of a local authority
    - failing these, some other responsible adult aged 18 or over who is not:
        - a police officer
        - employed by the police
        - under the direction or control of the chief officer of a police force
        - a person who provides services under contractual arrangements to assist a police force in relation to the discharge of its chief officer's functions

Appendix P: Key 'staying safe' content from personal development programme

EYFS & Key Stage 1

- About rules and age restrictions that keep us safe
- To recognise risk in simple everyday situations and what action to take to minimise harm
- About how to keep safe at home (including around electrical appliances) and fire safety (e.g. not playing with matches and lighters)
- That household products (including medicines) can be harmful if not used correctly
- Ways to keep safe in familiar and unfamiliar environments (e.g. beach, shopping centre, park, swimming pool, on the street) and how to cross the road safely
- About the people whose job it is to help keep us safe
- Basic rules to keep safe online, including what is meant by personal information and what should be kept private; the importance of telling a trusted adult if they come across something that scares them
- About what to do if there is an accident and someone is hurt
- How to get help in an emergency (how to dial 999 and what to say)
- To recognise that some things are private and the importance of respecting privacy; that parts of their body covered by underwear are private
- That sometimes people may behave differently online, including by pretending to be someone they are not
- How to respond safely to adults they don't know
- About how to respond if physical contact makes them feel uncomfortable or unsafe
- About knowing there are situations when they should ask for permission and also when their permission should be sought
- About the importance of not keeping adults' secrets (only happy surprises that others will find out about eventually)
- Basic techniques for resisting pressure to do something they don't want to do and which may make them unsafe
- What to do if they feel unsafe or worried for themselves or others; who to ask for help and vocabulary to use when asking for help; importance of keeping trying until they are heard

Key Stage 2

- Reasons for following and complying with regulations and restrictions (including age restrictions); how they promote personal safety and wellbeing with reference to social media, television programmes, films, games and online gaming
- How to predict, assess and manage risk in different situations
- About hazards (including fire risks) that may cause harm, injury or risk in the home and what they can do to reduce risks and keep safe
- About the importance of taking medicines correctly and using household products safely, (e.g. following instructions carefully)

- Strategies for keeping safe in the local environment or unfamiliar places (rail, water, road) and firework safety; safe use of digital devices when out and about
- About the importance of keeping personal information private; strategies for keeping safe online, including how to manage requests for personal information or images of themselves and others; what to do if frightened or worried by something seen or read online and how to report concerns, inappropriate content and contact
- About what is meant by first aid; basic techniques for dealing with common injuries
- About privacy and personal boundaries; what is appropriate in friendships and wider relationships (including online);
- About why someone may behave differently online, including pretending to be someone they are not; strategies for recognising risks, harmful content and contact; how to report concerns
- How to respond safely and appropriately to adults they may encounter (in all contexts including online) whom they do not know
- Recognise different types of physical contact; what is acceptable and unacceptable; strategies to respond to unwanted physical contact
- About seeking and giving permission (consent) in different situations
- About keeping something confidential or secret, when this should (e.g. a birthday surprise that others will find out about) or should not be agreed to, and when it is right to break a confidence or share a secret
- How to recognise pressure from others to do something unsafe or that makes them feel uncomfortable and strategies for managing this
- Where to get advice and report concerns if worried about their own or someone else's personal safety (including online)