



Woolwich Polytechnic
School for Girls



Woolwich Polytechnic School for Girls Child Protection and Safeguarding Policy

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Important contacts

| ROLE/ORGANISATION | | NAME | CONTACT DETAILS |
|---|----------------|------------------------|--------------------------------------|
| Designated safeguarding lead (DSL) Woolwich Poly Girls | | Rachel Brown | rbrown@woolwichpolygirls.co.uk |
| Local authority designated officer (LADO) | | 02089213930 | Childrens-lado@royalgreenwich.gov.uk |
| Trust Safeguarding Lead | | Jo Lumbis | jlumbis@polymat.co.uk |
| Chair of Trustees | Sylvia Perrins | sperrins@polymat.co.uk | |
| CEO PolyMAT | Tim Plumb | tplumb@polymat.co.uk | |

Policy Statement

As a school, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We endeavour to provide a safe and welcoming environment where children and adults feel respected and valued.

We maintain an attitude of '**it could happen here**' where safeguarding is concerned and promote a culture of openness where children have a voice and are listened to.

This policy provides staff, volunteers and governors with the framework required in order to keep children safe and secure in our school. Its purpose is also to inform parents and carers of how we will safeguard their children whilst they are in our care.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Greenwich Safeguarding Children's Partnership (GSCP) and locally agreed procedures.

This policy takes account of the "Keeping Children Safe in Education' statutory guidance and makes frequent references to it. [KCSIE 2025](#)

This policy provides information regarding different types of abuse and encompasses other statutory and non-statutory documentation and legislation.

The policy outlines the procedures that the school has in place to ensure all children in our care receive effective support, protection and justice. Preventative education is effective within our whole school approach and prepares children for life in modern Britain with a zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Academy Trust Governance Guide \(2024\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- 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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- Children who may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality, including those questioning their gender identity.

KCSIE update 2025: DfE expect to publish revised guidance on gender questioning children and will signpost to this guidance in September 2025.

- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

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

5.1 All staff

All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. They will complete half termly quizzes to show understanding of the guidance, and be sent safeguarding updates weekly via the school gateway.

All staff will complete an electronic declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware:

- Of our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and any deputies, the behaviour policy, e-safety policy, and the safeguarding response to children who go missing from education
- Of the early help process (sometimes known as the common assessment framework) 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

- Of the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- Of the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- Of the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- That children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- Of the importance that staff build trusted relationships with children and young people which facilitate communication.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

We recognise that schools and colleges play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school/college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These will be underpinned by the school/college's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme should be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program will tackle at an age-appropriate stages issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem

- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team in each school. At Woolwich Poly Girls' our DSL is Rachel Brown. The DSL takes lead responsibility for child protection and wider safeguarding in the school. They are supported by the pastoral team and a DDSL team, they all have to evidence their training and practice throughout the year. During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. Out of work hours the DSLs can be reached via email. If the DSL is absent, the deputies – will act as cover.

The role of DSL carries a significant level of responsibility, and they will be given the additional time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSLs will also keep the Head of School (for each school) informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss local issues and responses to them with the police and local authority to determine the most appropriate school response
- The role of the Virtual School
Heads <https://www.gov.uk/government/publications/virtual-school-head-role-extension-to-children-with-a-social-workernow> includes a non-statutory responsibility to "promote the educational achievement of all children in kinship care."

The full responsibilities of the DSLs and deputies are set out in their job description, some of which can be viewed in Appendix 8

5.3 The Local Academy Committee

The Local Academy Committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head of School to account for its implementation
- Appoint a senior board level (or equivalent) lead [or, link Local Academy Committee member] to monitor the effectiveness of this policy in conjunction with the full Local Academy Committee. This is always a different person from the DSL
- The Chair of the Local Academy Committee will act as the 'case manager' in the event that an allegation of abuse is made against the Head of School, where appropriate (see appendix 3).
- All Local Academy Committee members will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how Local Academy Committee members are supported to fulfil their role.

5.4 The Heads of School

The Heads of School are responsible for the implementation of this policy, including: Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

The Alternative Provision (AP) section has been expanded for clarification, and to reflect existing AP guidance (KCSIE 2025 update):

When a pupil is placed with an AP provider, settings are directed to:

- Obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment
- Receive notification of any arrangements that may put the pupil at risk
- Remain fully aware of where a pupil is based during school/college hours
- Review AP placements at least half termly

- Review and potentially terminate any placements where safeguarding concerns arise.

6. Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff / volunteers in school. All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the guidance 'Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers' (July 2018). It identifies seven golden rules for sharing information. It reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 (and 2020 update) and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

It should be noted that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding leads (or deputies)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, allegations of abuse against staff in appendix 3 and child-on-child sexual violence and sexual harassment in appendix 5.

7. Recognising abuse and taking action

Staff, volunteers and Local Academy Committee members must follow the procedures set out below in the event of a safeguarding issue.

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

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.** Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. See Appendix 2 for Local Authority guidance on reporting concerns

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it. Pass this information on to the relevant DSL or deputy immediately.
- The information should then be recorded on the relevant electronic safeguarding software for the school. (CPOMs).
- Aside from the DSL or deputies, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

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

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

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

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

Royal Greenwich Early Help Guidance

Royal Greenwich Early Help Guidance supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm. Early help is focused on developing and breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Professionals should, in particular, be alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs including certain medical needs
- Has special educational needs
- Is a young carer
- Is showing signs of engaging in anti-social or criminal behaviour

- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- Is showing early signs of abuse and/or neglect.

Further information can be found from: www.greenwichsafeguardingchildren.org.uk

Early Help consultation line: 0208 921 4590 1- 4pm

Early-help-refer@royalgreenwich.gov.uk

Early Help preventions directory available on the GSCP website

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

See Appendix 2 for further details

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

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

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

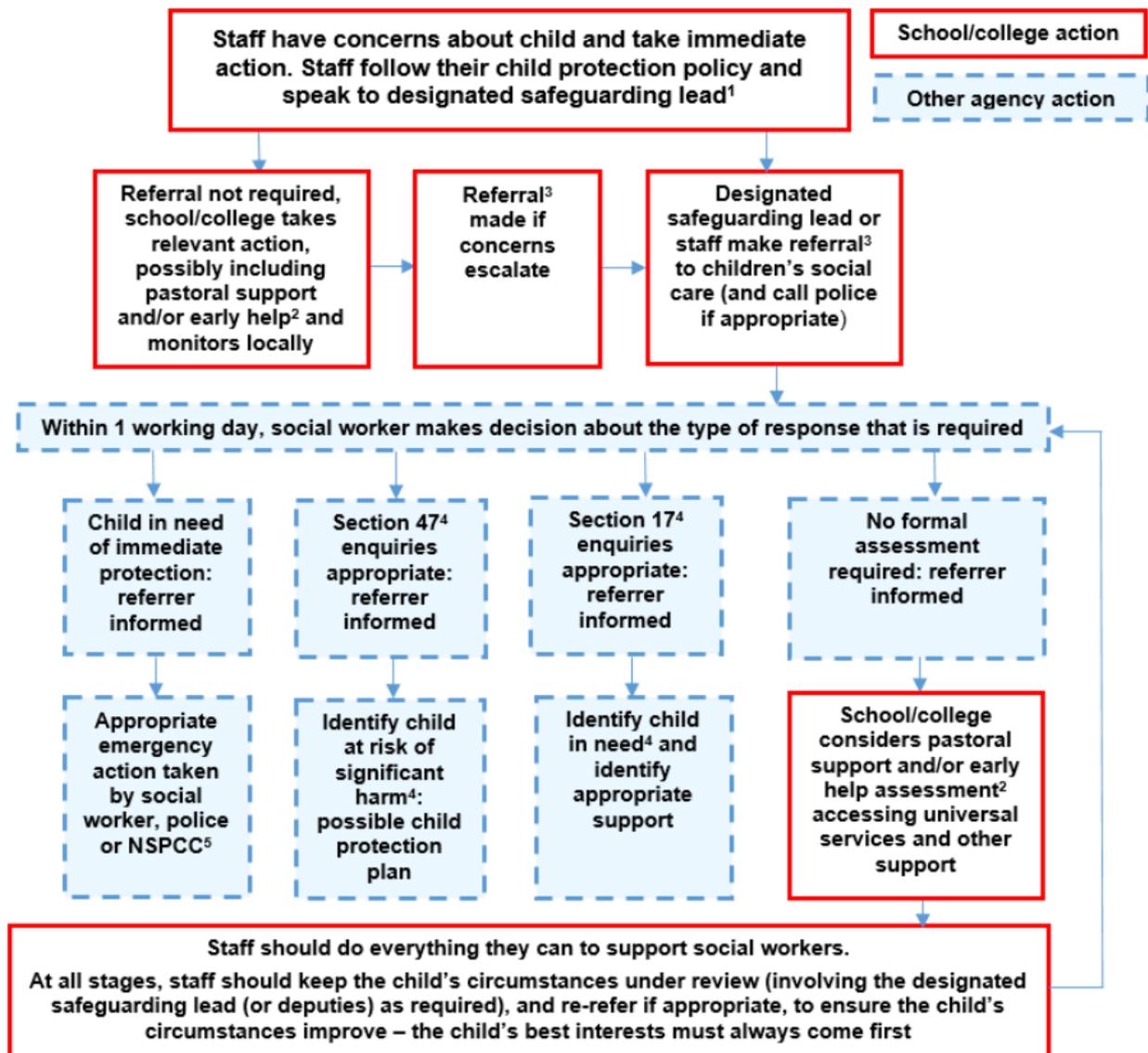
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

All concerns should be electronically recorded on the appropriate system for each school. (CPOMS)

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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



(Diagram taken from KCSIE 2022)

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the DSL OR Head of School as soon as possible. If the concerns/allegations are about the Head of School, speak to the DSL or the Chief Executive Officer. If the concerns/allegations are about the Chief Executive Officer, speak to the Chair of Trustees.

The Head of School/CEO/DSL/Chair of Trustees/Chair of the Local Academy Committee will then follow the procedures set out in appendix 2 and 4, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Head of School, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 5 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- The DSL and pastoral team will put in appropriate sanction/support/intervention for any victims, perpetrators and any other children affected.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

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

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and Senior leaders](#).

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through our safer schools officer or if they are unavailable by calling 101.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Personal Development Curriculum, including Relationships and Sex Education (RSE) and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Students are aware of the following:
 - They can report any concerns in person or in writing (sometimes via email) to their Head or Deputy Head of Year, the DSL or any of the pastoral team
 - Who the members of the safeguarding and pastoral team are via assemblies, PD lessons and posters around the school
 - They can make a disclosure or raise a concern in confidence and that their details would not be passed on to the party they are raising a concern about

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and Local Academy Committee members
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- We have the filtering system of Smoothwall in place, and the monitoring system of Impero. Alerts from these systems go the DSLs.

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

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 and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

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

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

11. Pupils with a social worker

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

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

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

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

12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher, the DSLs and deputies, who are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2 and 4).

13.2 Other complaints

Should staff or parents wish to make a safeguarding-related complaint, in the first instance they should contact the DSL. If the complaint is regarding the DSL, then they should contact the Head of School. If the complaint is regarding the Head of School, then it should be directed to the CEO and/or board of trustees. Please see our complaints procedure on the school website for further guidance.

13.3 Whistle-blowing

The school has a whistle-blowing policy which can be accessed via the school website. You can also access whistle-blowing advice via the NSPCC website or via their phone number 0808 800 5000.

14. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.

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

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

At both PolyMAT schools, records may be held on paper, electronically or both. All new concerns or records will be electronic and are held via our electronic safeguarding software (CPOMS). Paper-based files are held securely and separate from the main file. They will only be available to those who have a right or professional need to see them. The schools may have to share information with outside professionals or agencies when appropriate. Please see section 6 (Confidentiality) for further details. In addition:

Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety (includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the 3 safeguarding partners

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

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

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

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

Volunteers will receive appropriate training, if applicable.

15.2 The DSLs and any deputies

The DSLs and any deputies will undertake child protection and safeguarding training at least every 2 years. This will be monitored by the TSL.

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

They will also undertake Prevent awareness training.

15.3 Local Academy Committee members

All Local Academy Committee members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As The Chair of the Local Academy Committee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head of School, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

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

See appendix 3 of this policy for more information about our safer recruitment procedures.

16. Monitoring arrangements

This policy will be reviewed **annually** by DSLs. At every review, it will be approved by the full Local Academy Committee.

17. Links with other policies

This policy links to the following policies and procedures:

Behaviour and exclusion
Staff Code of conduct
Complaints
Health and safety
Attendance
E- safety
Mobile phone use
Equality
Relationships and sex education
First aid
Curriculum (Including PD/RSE)
Designated teacher for looked-after and previously looked-after children
Privacy notices
Whistle-blowing
Acceptable use (IT) and social media
Anti-bullying

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. The definition of abuse from KCSIE 2022 states:

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. 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.

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

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

Emotional abuse may involve:

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

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

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

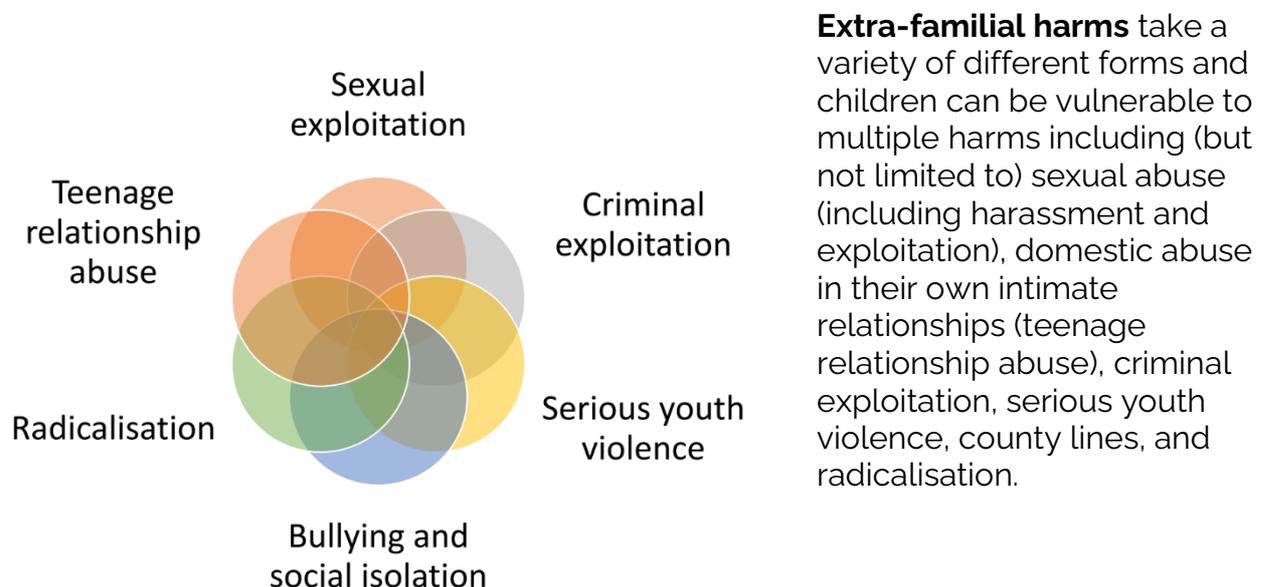
Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

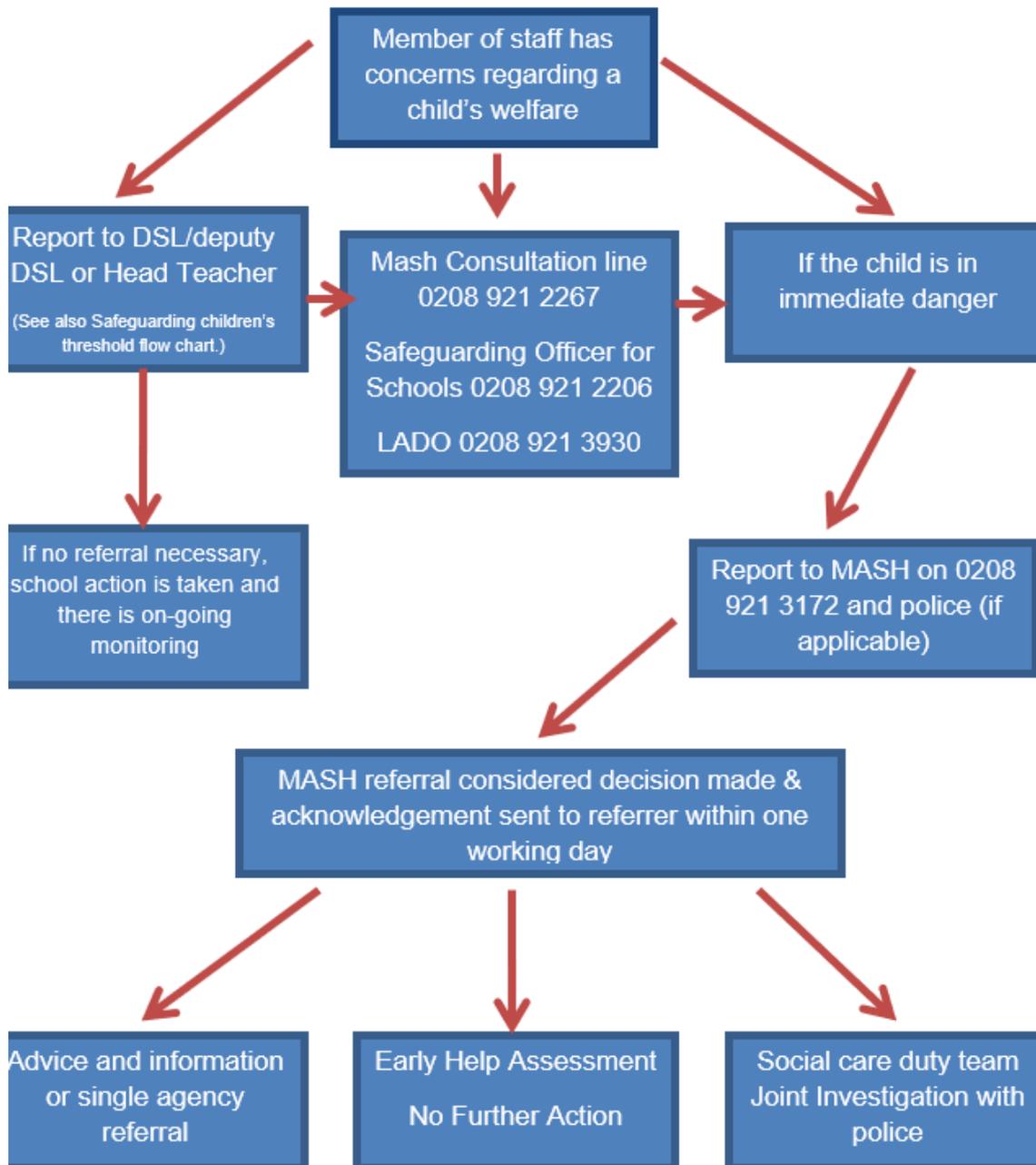


Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

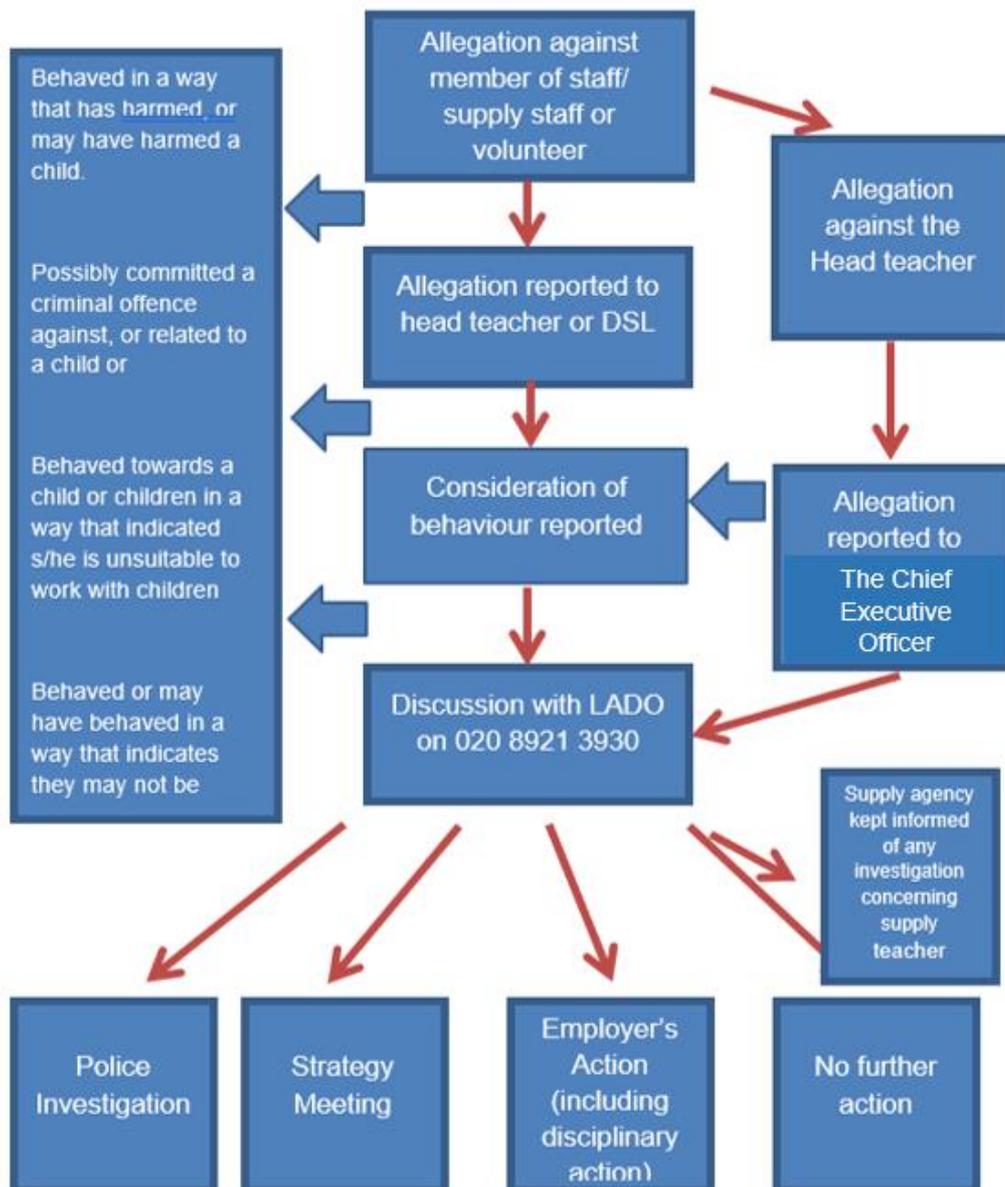
(Diagram From Contextual Safeguarding Network)

Appendix 2: flowcharts for reporting concerns (Greenwich LA)

Flowchart 1 (for reporting concerns regarding a child/young person)



Flowchart 2 (for Managing Allegations against staff, supply staff and volunteers)



Appendix 3 safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- In addition, as part of the shortlisting process, the school will carry out an online search as part of their due diligence on the shortlisted candidates

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

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

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

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 (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still 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
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The 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

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

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

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.

Volunteers

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
- 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

Local Academy Committee members

All Local Academy Committee members and All Trustees, 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 Committee will have their DBS check countersigned by the secretary of state.

All proprietors, Trustees, Local Academy Committee members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for Local Academy Committee members if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

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

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.

Appendix 4: Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A 'case manager' will lead any investigation. This will be the Head of School, or The Chair of the Local Academy Committee where the Head of School is the subject of the allegation. The case manager will be identified at the earliest opportunity. This will be reported to the TSL.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the

alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed:

- Take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, 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 Local Academy Committee will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Head of School will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses
- The Head of School will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.
- The Head of School should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns that the Head of School may wish to consult with the DSL and take a more collaborative decision making approach.
- If the school are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with the LADO.
- Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. They will also be recorded on Staff Safe, part of CPOMs. Initially viewing of this will be limited to the CEO, Headteachers, DSLs and TSL.

Records will be:

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

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

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 5: specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B.

Children missing from education and absent for prolonged periods of time

A child going missing from education, particularly repeatedly and/or for prolonged periods, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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 missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend

- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. 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.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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 designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

The DSLs and any deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff

have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society

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

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 or more children of any age and sex, from primary through to secondary stage and into college
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap and are never acceptable.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The school will also consider intra-familial harms and any support for siblings following a report or sexual violence and/or harassment. This will include liaising with the school of the sibling(s) if they do not attend the same school to ensure that any appropriate support is provided.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Harmful Sexual Behaviour

We recognise that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). We incorporate preventative education around HSB into our Personal Development and RSE curriculum.

DSLs (and deputies) will have a good understanding of HSB and will consider:

- HSB can occur online and/or face-to-face and can also occur simultaneously between the two
- both ages and the stages of development of the children are critical factors
- Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not
- However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature
- Recognise that children displaying HSB have often experienced their own abuse and trauma
- Seeking advice from outside agencies to provide appropriate support for any and all young people involved in any way

Considering confidentiality and anonymity

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The school will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, the DSL/Head of School may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Before doing so the DSL and Head of School will consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the

police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

- The balance of the victim's wishes against our duty to protect the victim and any other children

Should the decision be made to report against the victim's wishes, the reasons behind it will be explained to the victim and support offered.

Regarding anonymity, the school will:

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

When dealing with cases of child-on-child sexual violence and/or sexual harassment

The DSLs should take the lead role and provide guidance and consideration of the following:

- It will be made clear to all victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Language used will be child led (i.e. they may not want to be known as a victim)
- Liaising with families and outside agencies to provide the most appropriate support for the victim and their families (including any siblings)
- Working closely with the police and any other agency as part of any criminal or child protection processes whilst supporting the victim, especially during any delays in the process
- Ensuring that any action taken by the school does not jeopardise any police investigation
- Regular review of decisions and actions as well as updating any relevant policies and procedures with lessons learnt
- Observe and react to any potential patterns or concerning, problematic or inappropriate behaviour
- Consider if there are any wider cultural or contextual issues within school that enabled inappropriate behaviour to occur and whether any extra training or teaching time could minimise the risk of it happening again

- Remember that children that have experienced sexual violence and/or harassment can display a wide range of responses. When spotting those signs we will show sensitivity to their needs and provide appropriate support

Discipline and the alleged perpetrator(s)

The DSLs should take the lead role and provide guidance and consideration of the following:

- The school can take disciplinary action whilst other investigations are ongoing e.g. by the police
- The fact another body is investigating/has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and impose a penalty accordingly. This is a matter for the school and it should be considered on a case-by-case basis
- The school will consider whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
 - There are circumstances that make it unreasonable/irrational for us to reach our own view about what happened
- The school can, and will, take disciplinary action and still provide support at the same time if necessary

Working with parents and carers

- The school will (in most cases) engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of sexual violence (this might not be necessary in relation to sexual harassment, but the school will decide this on a case-by-case basis)
- The exception is if there's reason to believe informing a parent or carer will put the child at additional risk
- The school will carefully consider what information it provides about the other child involved, and when. The school will work with relevant agencies to ensure our approach to information sharing is consistent
- School will endeavour to:
 - Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress
 - Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. The school will explain the reason behind any decision
- The DSL will attend these meetings and will decide what other agencies should attend on a case-by-case basis

Safeguarding other children

The school will support children who have witnessed sexual violence, especially rape and assault by penetration.

Other considerations include:

- The school doing all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed
- Social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- Transport to and from school to be included as part of a risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s)
- Keeping policies, processes and curriculum constantly under review to protect all children
- Reports of sexual violence and/or harassment may:
 - Point to environmental/systematic problems that could be addressed by updating policies, processes and the curriculum
 - Reflect wider issues in the local area

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
 - Being male
 - Having been frequently absent or permanently excluded from school
 - Having experienced child maltreatment
 - Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

- Visitors are expected to sign in as a visitor on our electronic signing in system and wear a visitor's badge.
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:
 - Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
 - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

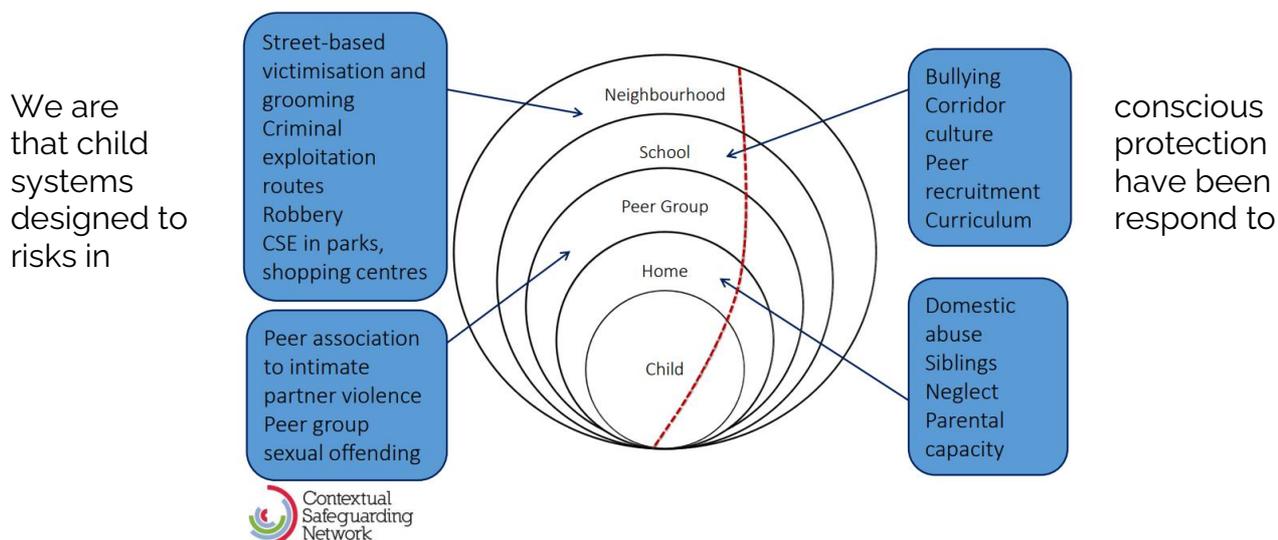
All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities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

Our staff and students are all aware that our visitors should all be wearing a coloured lanyard and that the different colours have meaning attached. For example, DBS checked visitors wear a yellow visitor lanyard, whereas non-DBS checked visitors wear a red visitor lanyard. This information is displayed around the school as a reminder.

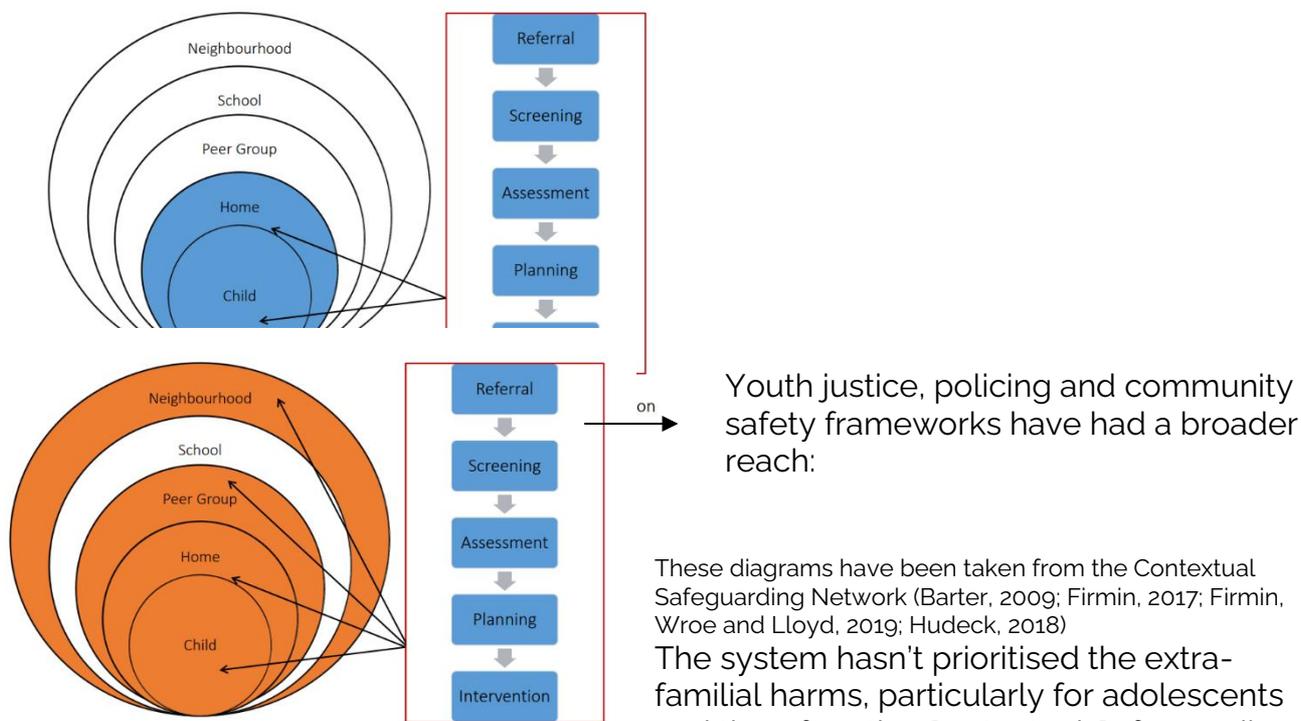
Appendix 6: Contextual Safeguarding

The concept of Contextual Safeguarding was developed by Dr Carlene Firmin and her team at the University of Bedfordshire. The organisation is known as the Contextual Safeguarding Network. Members of staff in both schools have been trained in contextual safeguarding and will use elements of it in our safeguarding practices.

When dealing with Safeguarding and putting strategies in place to keep our students safe and well informed we will consider the wider context for them.



families/homes:



Youth justice, policing and community safety frameworks have had a broader reach:

These diagrams have been taken from the Contextual Safeguarding Network (Barter, 2009; Firmin, 2017; Firmin, Wroe and Lloyd, 2019; Hudeck, 2018)

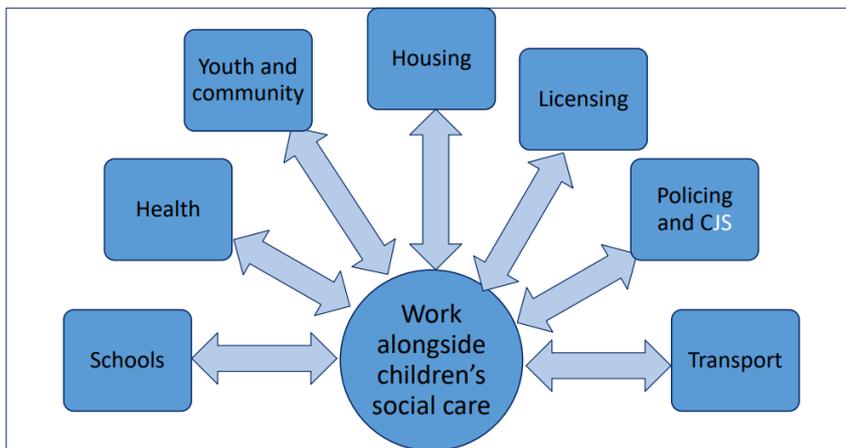
The system hasn't prioritised the extra-familial harms, particularly for adolescents and therefore the Contextual Safeguarding Network are working to change that and have provided frameworks for

organisations to consider when dealing with the safeguarding of young people. There is an emphasis on creating safe spaces, including schools.

Safeguarding being *'Everyone's responsibility'* will mean everyone creating safe spaces

(Firmin et al. 2016)

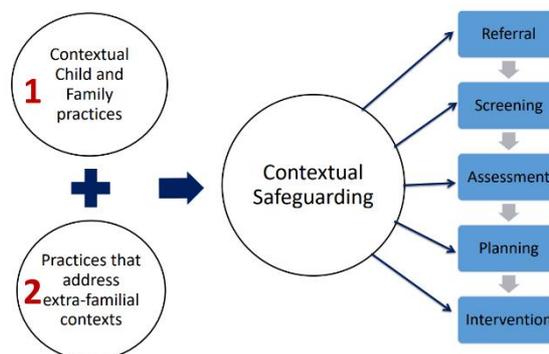
From this idea, staff in safeguarding roles have been trained to consider vulnerabilities, concerns, strengths and capacities to safeguard for various people or groups involved in any safeguarding situation as follows:



| | Vulnerabilities | Concerns | Strengths | Capacity to safeguard |
|---------------|-----------------|----------|-----------|-----------------------|
| Young person | | | | |
| Family/home | | | | |
| Peer group(s) | | | | |
| School | | | | |
| Neighbourhood | | | | |

This supports in making the most informed decisions as well as being strategic and forward-thinking in our approaches. We can use this to recognise how different areas affect one another and apply context weighting before making a decision on actions. It is particularly helpful in recognising the significance of peer relationships in the lives of our young people.

The work of the Contextual Safeguarding Network has shown that the work happens on two levels; contextual child and family practices, as well as practices that address extra-familial contexts:



In school these levels would include:

Level 1:

- Young person led assemblies and campaigns
- Parenting groups around specific issues (e.g. child exploitation)
- Recording and sharing information with students



- Safety mapping (e.g. where in our school or local community do our students feel safe/unsafe and why)
- School surveys
- Mentoring projects
- Bystander training for students
- School culture focussed on equality and challenging discrimination

Level 2:

- Referral systems – for individuals, groups and/or locations
- Looking at the safety mapping from Level 1 and coordinating plans to reduce risk and increase safety in that location or context
- System wide attention to systemic harm

Moving forward we will be looking to implement and use more guidance and tools from the Contextual Safeguarding Network such as the School Assessment Table (below) and Safety Mapping tools for students or groups of students that are causing concern but do not meet thresholds of outside agencies.

School Assessment Table

| Pupil Development Needs | | | | | |
|--|--|--|--|---|---|
| Health (Of school population in relation to safeguarding) | Education (Curriculum, PSHE, SRE in relation to safeguarding) | Emotional and behavioural development (The moods and emotional regulation of pupils) | Identity and school culture (e.g. positive, normalisation, ethos of staff and students) | Peer relationships (Between students and staff to students) | Social presentation (e.g. of students to staff and outsiders) |
| | | | | | |
| Guardianship Capacity | | | | | |
| Ensuring safety (Guardians are able to ensure students' physical, emotional, psychological wellbeing) | Trusted relationships (Students have relationships with adults whom they trust in the school) | Knowledge and understanding of safeguarding role (Staff have training on safeguarding, are aware of safeguarding policy and procedures and act upon this) | | Policy framework (The school have appropriate policies in place to respond to safeguarding concerns that are used by staff and relate to those in use by the multi-agency partnership) | |
| | | | | | |
| Environmental and Family Factors | | | | | |
| Neighbourhood safety (Are students safe on their journey and around school? Is the school aware of issues locally and included in forums to discuss these?) | Parental integration (Are parents supported to engage with the school) | Physical school safety (Do students feel safe in school? Is information collated on the location of incidents etc. are there issues affecting the safety of students linked to the physical and online world) | Resources (Does the school have resources to respond to safeguarding issues? Do they engage with local partnership services etc.) | Thresholds (Are there clear thresholds internally for responding to safeguarding/behavioural issues? Are staff aware of these? Do these link to those used by the multi-agency partnership?) | |
| | | | | | |

Appendix 7: Searching

This appendix is mostly based on the advice Searching, Screening and Confiscation Advice for schools July 2022

Ensuring school staff and pupils feel safe and secure is vital to establishing calm and supportive environments conducive to learning. Using searching, screening and confiscation powers appropriately is an important way to ensure pupil and staff welfare is protected and helps us establish an environment where everyone is safe.

Designated Safeguarding Leads, any Deputy Headteachers, the Senior Leadership Team and the wider pastoral team are trained to know the rights of the student in the case of a search and are confident in holding other agencies to account if they feel that those rights are not being adhered to. This includes that before a screening or conducting a search of a pupil, that we consider our obligations under the European Convention on Human Rights. Under Article 8, pupils have a right to respect for their private life. In the context of these rights and obligations, this means that pupils have the right to expect a reasonable level of personal privacy.

Searching

Headteachers and staff they authorise have a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that the pupil may have a prohibited item or any other item that the school rules identify as an item which may be searched for.

The list of prohibited items is:

- knives and weapons;
- alcohol;
- illegal drugs;
- stolen items;

any article that the member of staff reasonably suspects has been, or is likely to be used:

- to commit an offence, or
- to cause personal injury to, or damage to property of; any person (including the pupil).
- tobacco and cigarette papers
- fireworks; and
- pornographic images.

The banned items are named in each school's behaviour policy

Under common law, school staff have the power to search a pupil for any item if the pupil agrees. The member of staff should ensure the pupil understands the reason for the search and how it will be conducted so that their agreement is informed.

Our stance on this is that we will always adopt a safeguarding first approach should these incidents arise. Students should be protected from harm at all times, including whilst being searched. Should this situation arise, the Designated Safeguarding Lead and/or any Deputy Headteachers should be informed before any search takes place and make the decision as to whether a search is warranted.

If a student refuses to be searched, and the member of staff still considers a search to be necessary but is not required urgently, they should seek the advice of the Headteacher or DSL. During this time, the pupil should be supervised and kept away from other pupils. If the pupil still refuses to co-operate, the Headteacher and DSL should assess whether it is appropriate to use reasonable force to conduct the search, this would only be considered for prohibited items.

During a search.

An appropriate location for the search will be found. Where possible, this will be away from other pupils. The law states the member of staff conducting the search must be of the same sex as the pupil being searched. There must be another member of staff present as a witness to the search.

There is a limited exception to this rule. This is that a member of staff can search a pupil of the opposite sex and/or without a witness present only:

- if the member of staff carrying out the search reasonably believes there is risk that serious harm will be caused to a person if the search is not carried out as a matter of urgency; and
- in the time available, it is not reasonably practicable for the search to be carried out by a member of staff who is same sex as the pupil or it is not reasonably practicable for the search to be carried out in the presence of another member of staff.

A member of staff will only search a pupil's outer clothing, pockets, possessions, desks or lockers. The person conducting the search will not require the pupil to remove any clothing other than outer clothing. 'Outer clothing' means any item of clothing that is not worn wholly next to the skin or immediately over a garment that is being worn as underwear, as well as hats, shoes, boots or scarves.

The member of staff's power to search outlined above does not enable them to conduct a strip search.

A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C. 12 While the decision to undertake the strip search itself and its conduct are police matters, school staff retain a duty of care to the pupil(s) involved and should advocate for pupil wellbeing at all times. Before calling police into school, the DSL and Headteacher will assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item. Staff will consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and will always ensure that other appropriate, less invasive approaches have been exhausted.

Unless there is an immediate risk of harm and where reasonably possible, staff will inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents will always be informed by a staff member once a strip search has taken place. We will keep records of strip searches that have been conducted on school premises and monitor them for any trends that emerge. An appropriate adult not of the same sex as the pupil being searched may be present if specifically requested by the pupil. Otherwise, no-one of a different sex to the pupil being searched is permitted to be present, and the search must not be carried out in a location where the pupil could be seen by anyone else. After-care following a strip search: pupils should be given appropriate support, irrespective of whether the suspected item is found.

Any illegal items or substances discovered in a search will be handed over to the police. Other banned items that are not illegal will be dealt with on a case-by-case basis as explained in the confiscation section of the overarching Safeguarding and Child Protection policy.

Appendix 8 DSL role

Main areas of responsibility

- Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place)
- They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of children.
- Support staff members to carry out their safeguarding duties
- Liaise closely with children's social care and other services

The DSL's main responsibilities are set out on pages 28 and 29 and in Annex C of [Keeping Children Safe in Education 2023](#) (KCSIE).

Managing referrals

The DSL will refer cases:

- Of suspected abuse and neglect to the local authority (LA) children's social care team as required, and support any staff who do so
- To the Channel programme where there is a radicalisation concern, and support any staff who do so
- To the Disclosure and Barring Service (DBS), if a person is dismissed or leaves due to risk or harm to a child
- To the police, where a crime may have been committed

This is set out on page 165 of KCSIE 2023.

Working with others

Working with staff and other agencies

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Inform the headteacher of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and the requirement for pupils to have an appropriate adult
- Liaise with the case manager and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health

- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
 - Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by:
 - Knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced
 - Identifying the impact that these issues might be having on children's attendance, engagement and achievement at school
- The above includes:
- Ensuring the school knows which children have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
 - Supporting teaching staff to provide additional academic support or reasonable adjustments to help these children reach their potential

Managing the child protection file

- Ensure child protection files are kept up to date
- Keep information confidential and store it securely
- Make sure records include:
 - o A clear and comprehensive summary of the concern
 - o Details of how the concern was followed up and resolved
 - o A note of any action taken, decisions reached and the outcome
- Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE)
- Where children leave the school (including in year transfers):
 - o Ensure their child protection file is securely transferred to the new school as soon as possible, separately from the main pupil file, with a receipt of confirmation, and within the specified time set out in KCSIE
 - o Consider whether it would be appropriate to share any additional information with the new school before the child leaves, to help them put appropriate support in place

Raising Awareness

- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- Work with the governing board to ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly
- Ensure the child protection policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Help promote educational outcomes by sharing information with teachers and school leadership staff about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing

Training

- Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the 'Training, knowledge and skills' section of annex C

- Undertake Prevent awareness training

- Refresh knowledge and skills at regular intervals and at least annually

Providing support to staff

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters

- Support staff during the referrals process

- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support

Understanding the views of children

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them

- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding and sharing information

- Understand the importance of information sharing, both within the school, with other schools and colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

- Keep detailed, accurate, secure written records of concerns and referrals

Other areas of responsibility

The DSL will be required to safeguard and promote the welfare of children and young people, and follow school policies and the staff code of conduct.

During term time, the DSL should always be available during school hours for staff in the school to discuss any safeguarding concerns. Ideally this will be in person but can also be via phone or video call in exceptional circumstances.

Please note that this list of duties is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks that the DSL will carry out. The postholder may be required to do other duties appropriate to the level of the role.