



Safeguarding Children & Child Protection Policy 2025-26

Approved by:	Full Governing Body
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Date of next review:	October 2025
Designated Governor for Safeguarding & Child Protection	Georgina Ioannides
Designated Teacher for Safeguarding & Child Protection	Fiona Russell

Gumley House School FCJ exists to provide a Catholic education for all students. In partnership with parents/carers, we help each student to develop with dignity as a person in relationship with Jesus Christ and each other. The six FCJ values are at the core of the Safeguarding Children and Child Protection Policy at Gumley: Companionship, Dignity, Excellence, Gentleness, Hope and Justice. We value each and every member of the community as unique and take every opportunity to support their well-being.

At Gumley we believe that good student behaviour and discipline at school is fundamental to student and school progress, the raising of educational standards and to increasing educational inclusion. The words, beliefs and actions of Marie Madeleine d’Houet, foundress of the FCJ Community, provide us all at Gumley with the clearest guidance as to our responsibility to those in our care.

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Contact Details

Gumley House School FCJ

Staff with designated responsibility for Safeguarding & Child Protection:

The Designated Safeguarding Lead:

Fiona Russell – Deputy Headteacher – frussell@gumleyhouse.com

The Deputy Designated Safeguarding Leads:

Mrs Lita Hasker – Pastoral Manager – lhasker@gumleyhouse.com

Miss Eleanor Wilson – Pastoral Assistant – ewilson@gumleyhouse.com

Mrs Jean Mc Sweeney – SEND team- jmcsweeney@gumleyhouse.com

Mr Anthony Graham – SLT - agraham@gumleyhouse.com

Mrs Tamara Solano – Attendance and Welfare – tsolano@gumleyhouse.com

Mrs L O Sullivan – KS4 Pastoral Lead- losullivan@gumleyhouse.com

Ms M Tournier – KS5 Pastoral Lead – mtournier@gumleyhouse.com

Safeguarding Governor: Georgina Ioannides- gikvassay@googlemail.com

London Borough of Hounslow

Child Abuse Investigation Team (CAIT) based at Feltham Police Station
(020 8247 6331)

Channel Helpline 02073407264

Children’s Social Care: Safeguarding advisor - LADO

Grace Murphy (020 8583 4933) Email grace.murphy@hounslow.gov.uk (Wed- Fri)

Sarah Paltenghi (0208 583 3423/07970198380) Email sarah.paltenghi@hounslow.gov.uk (Mon – Wed)

Referrals Contact earlyhelp@hounslow.gov.uk

Additional Resources, policies and procedures – www.hscb.org.uk

1. Aims

We strive to develop a caring, secure environment in which our young people feel completely safe, respected and valued to grow to full dignity as a person in relation to Jesus Christ and each other. School staff should explicitly understand their responsibilities in order to achieve positive outcomes, keep children safe, and complement the support that other professionals may be providing.

Our endeavour is to promote each student's interests regarding welfare, safety, health and guidance in an ethos designed to assure each student's spiritual, social and emotional development. Our Safeguarding policy demonstrates our active commitment:

- To support the child's development in ways that will foster security, confidence and independence and equip them with skills needed to keep them safe.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- To ensure all staff are aware of their statutory responsibilities with respect to safeguarding.
- To ensure staff are properly trained in recognising and reporting safeguarding issues.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and to ensure we, the school, contribute to assessments of need and support packages for those children including those on child protection plans.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To paying full regard to 'Keeping Children Safe in Education' (Sept 2024). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS).
- To ensure all recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of students.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and [Academy Trust Governance Guide](#). We comply with this guidance and the procedures set out by our local Hounslow Safeguarding Children Partnership HSCP.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils 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
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

We recognise that all adults, including temporary staff, ancillary supply and contractors, volunteers and governors, have a full and active part to play in protecting our students from harm, and that the child’s welfare is our paramount concern.

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

This policy also complies with our funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

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 Hounslow local authority
- Integrated care boards – Hounslow Safeguarding Children Partnership (HSCP)
- The chief officer of police for a police area in the Hounslow area

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

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

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, 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 and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- 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 female genital mutilation (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
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

When the school is considering suspending, fixed term or permanently, a vulnerable student and/or a student who is the subject of a child protection plan or where there is an existing child protection file, we will discuss the school's position with the relevant external agency prior to making the decision to exclude.

Guidance on children in specific circumstances is in Hounslow's Safeguarding Children Partnership's procedures as listed below:

- Children Educated Voluntarily at Home by Parent
- Children in Employment
- Children in Entertainment
- Children who are Looked After
- Drug and Alcohol Abusing Parents
- Domestic Violence.
- Forced Marriage
- Female Genital Mutilation
- Children in Need of Intimate Care
- E-Safety - Photography, Videos and Other Creative Arts
- Child Sex Exploitation
- Children who Sexually Abuse Other Children
- Sexually Active Young People Under the Age of 18
- Child Pregnancy
- Children Involved in Prostitution
- Honour based violence
- Breast Ironing

Children with Special educational needs

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

At Gumley our SEND Dept/ Safeguarding team identify students who might need more support to be kept safe or to keep themselves safe by working closely with staff to achieve best outcomes for the student.

5. Framework for Action

- Our Safeguarding policy and practice embrace areas of responsibility such as Health and Safety, bullying, racist abuse, child on child abuse – sexual violence and sexual harassment, internet safety education, first aid administration, educational visits and risk assessment, use of physical intervention and a number of other issues. To that end, these areas are interrelated with Safeguarding school policies and guidance. Please refer to separate policies.

Our Safeguarding policy sets the framework for us to:

- Ensure that there is a Safeguarding & Child Protection policy together with a staff behaviour (Staff Code of Conduct & Safe Practice) policy
- Ensure that the school operates safer recruitment procedures by ensuring that there is one person on every recruitment panel that has completed Safer Recruitment training and at least one member of the Governing body on a panel has also done so.
- Ensure that the school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- Ensure a senior leader has been appointed as the Designated Safeguarding Lead (DSL)
- Ensure that on appointment, the DSL undertakes interagency training (HSCP relevant courses) and the 'Update' Course every 2 years.
- Ensure that all other staff have annual Safeguarding training and regular updates.
- Ensure that any weaknesses in Safeguarding & Child Protection are remedied immediately.
- Ensure that a member of the Governing Body (usually the Chair) is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher.
- Ensure that Safeguarding and Child Protection policies and procedures are reviewed annually and that the Safeguarding and Child Protection policy is available on the school website or by other means.
- Ensure that the Governing Body considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through RE, PSHE, PD, General RE (6th form), Tutor time as well as through themes in academic subjects e.g., English, History, Drama.
- Ensure that enhanced DBS checks are in place for Governors. (Section 128 – KCSIE 2024)

6. Safe School, Safe Staff

- The Designated Safeguarding Lead (DSL), Fiona Russell is a member of the Senior Leadership Team. The Deputy DSLs are Lita Hasker, Eleanor Wilson, Laura O Sullivan, Anthony Graham, Jean Mc Sweeney, Manon Tournier and Tamara Solano. These officers have undertaken the compulsory training delivered through the HSCP/ Key for Leaders and upon appointment will undertake 'DSL New to Role' training and annual updates. All DSLs have Advanced Level 3 training.
- The DSL who is involved in recruitment and at least one member of the Governing Body will also complete Safer Recruitment Training. This will be repeated every 5 years.
- All members of staff and volunteers are provided with Safeguarding and awareness information at induction, including in their arrival pack, the school safeguarding leaflet so that they know who to discuss a concern with.
- All members of staff are trained in and receive regular updates in online safety, updated by the DSL and DDSL's as appropriate, to maintain their understanding of the signs and indicators of abuse.
- All members of staff, volunteers, and governors know how to respond to a student who discloses abuse through delivery of 'Keeping Children Safe in Education' 2025 'Working together to Safeguard Children', and 'What to do if you suspect a Child is being Abused' (2015)
- All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the school's Safeguarding and Child Protection Policy.
- Community users organising activities for children are aware of the school's Safeguarding and Child Protection guidelines and procedures.
- We will ensure that child protection type concerns or allegations against adults working in the school are referred to the LADO for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation,

dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.

- Our procedures will be regularly reviewed and updated.
- The name of the designated members of staff for Safeguarding and Child Protection, the Designated Safeguarding Lead and deputies, will be clearly advertised in the school reception and staff room.
- All new members of staff will be given a copy of our safeguarding leaflet and Safeguarding and Child Protection policy, with the DSL and DDSLs names clearly displayed, as part of their induction into the school.
- The policy is available publicly either on the school website or by request. Parents/Carers are made aware of this policy and their entitlement to have a copy of it via the school handbook/newsletter/website.
- All staff will be emailed a copy of part 1 of 'Keeping Children Safe in Education' 2025 to include Annex B and Part 5, will sign that they have read and understood it at the start of each academic year. Similarly, this applies to the Governing Body in relation to part 2 of the same statutory guidance.
- The Induction of new staff will include CP policy and procedures, role of DSL and knowledge of changes to KCSIE 2025.

7. Roles & Responsibilities

The Designated Safeguarding Lead (DSL) is responsible for:

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

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of school hours the DSL can be contacted via email frussell@gumleyhouse.com

When the DSL is absent, the DDSL's – will act as cover during term time. (see names/roles on page 1 of policy)

If the DSL is not available during out-of-hours/out-of-term activities, then the headteacher will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

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

- Be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputies are set out in their job description.

- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and SLT.
- Ensure that staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Referring a student if there are concerns about possible abuse, to the relevant Local Authority Early Help Team, and acting as a focal point for staff to discuss concerns. Referrals will be made in writing, following a telephone call using the relevant LA form.
- Keeping all records of concerns about a student even if there is no need to make an immediate referral on our Myconcerns software.
- Ensuring that all such records are kept confidentially and securely and are separate from student records, until the student’s 25th birthday.
- Ensuring that an indication of the existence of the additional file is marked on the student records.
- If a student moves to another school or college, the school will retain a copy of the CP file until such time that the new school/ college acknowledges receipt of the original file. The copy can then be shredded.
- Liaising with other agencies and professionals.
- Ensuring that they or one of the team attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- Ensuring that any student with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker’s Social Care Team.
- Follow procedures from HSCP regarding Children Missing in Education.
- Organising Safeguarding and child protection induction, and annual update training for all school staff.
- Providing, with the Head teacher and Chair of Governors, and contributing to the “Audit of Statutory Duties and Associated Responsibilities” to be submitted to the HSCP Safeguarding Team.
- Informing the Headteacher of any issues especially on-going enquiries under section 47 of the Children Act 1989 and police investigations (Sections 17/10) Children Act 1989.

The governing board

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school’s local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the [DfE's filtering and monitoring standards](#) and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards. Completing an annual review with minutes noting compliance and action plans.

➤ Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

➤ Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

All governors will read Keeping Children Safe in Education in its entirety.

The headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring staff and volunteers are informed of our systems which support safeguarding, including the 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 when their child joins the school and via the school website.
- Ensuring the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as a case manager in the event of an allegation of abuse against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

The Virtual schools head

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

All staff

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling 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 FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable
 -

All staff will:

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

8. Guidance for Staff when Concerned (See appendix 5)

- All staff should be aware of their duty to raise any concerns they might have about a child immediately.

- Please familiarise yourself with the guidance for ‘Dealing with Disclosures’ set out in Appendix 5.
- Immediately inform the Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads (or the Headteacher if the DSL is accused or suspected of abusing), and follow up by producing a referral on the Myconcerns database.
- If you are in class and feel you immediately need to discuss a Safeguarding /Child Protection issue, ask for cover so you can speak to one of the Designated Staff and fill in the referral on Myconcerns database.
- Using this referral make a careful record of the information, where possible using the student’s own words, and including times, dates, places of incident(s), persons present, what was said. Where appropriate provide details of any visible marks and injuries. Submit the completed referral form; the Safeguarding team will follow this up. (or the Headteacher in a situation where the DSL or DDSL is the subject of the concern), who will make a decision based on your report, judging whether the issue should be referred to outside agencies or not.
- If a referral needs to be made the DSL will complete the relevant LA form and submit it for consideration as well as contact the Early Help Team if possible.
- If the concerns about the student are significant and meet the additional needs/complex need criteria, they will be referred to the MASH (Multi-Agency Safeguarding Hub). This includes concerns about a young person who is affected by the behaviour of a parent or other adult in their household, a young person who is in immediate danger. If a young person is affected by child-on-child abuse, sexual abuse or sexual harassment, the police may be informed.
- This information will be stored on the MyConcerns database and will only be accessed on a ‘need to know’ basis. Information stored on Myconcerns, is confidential and secure.
- If, at any point, there is a risk of immediate serious harm to a student a referral will be made to Children’s Social Care immediately. Anybody can make a referral. If the student’ situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the student.

8. Guidance for staff – recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- Is frequently missing/goes missing from education, care or home
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care

- Is at risk of so-called ‘honour’-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- May be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

8.1 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 as soon as possible if you make a referral directly.

8.2 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
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

8.3 If you discover that FGM has taken place or a student 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 student has already been subjected to FGM, and factors that suggest a student 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 student **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 student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

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

8. 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)

The Figure 1 below, 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. Share any action taken with the DSL as soon as possible.

1. In cases, which also involve a concern or an allegation of abuse against a staff member, see Part four of the guidance available in 'Keeping Children Safe in Education' (DfE Sept 2024).
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter 1 of 'Working Together to Safeguard Children' (DfE July 2018) provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter 1 of 'Working Together to Safeguard Children' (DfE July 2018)

4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under s17 of the Children Act 1989. Under s47 of the Children Act 1989 where the local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, it has a duty to make enquires to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter 1 of 'Working Together to Safeguard Children' (DfE March 2018).

5. This could include applying for an Emergency Protection Order (EPO).

Hounslow Early help

- Members of the safeguarding team may use a Child and Family Assessment Notification Form (CFAN) found on the school dashboard for families about whom we have concerns and where there is likely to be multi-agency working.
- Our aim is to identify student/families who would/could benefit from further support at the earliest stage possible. This support may involve sign posting/referring/information, sharing with the appropriate agencies, family support worker interventions, counselling, liaising/information sharing with agencies already working with families, assessments as well as offering the support from our pastoral team and school counselling service.
- In addition to working with the designated lead, staff may be asked to support Social Care/Police/ PREVENT panels to take decisions about individual students.
- We will listen and take seriously any disclosure or allegation of abuse and any concern expressed about the safety and well-being of our students. We will consider the 'unthinkable' and challenge when required.

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.

8.5 If you have concerns about extremism or radicalisation

- As part of the Prevent Strategy and Counter-Terrorism and Security Act 2015, Gumley House School has a duty to have due regard to the need to prevent students and young people being drawn into terrorism and extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- Gumley House School values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion
- The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Gumley is clear that this exploitation and radicalisation should be viewed as a safeguarding and child protection concern. Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 3.

- Gumley seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.
- This will be reviewed as part of the annual return that is monitored by Hounslow and the HSCP.
- When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with Fiona Russell (DSL and Prevent Lead). They should then follow normal safeguarding procedures. 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 governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk Note that this is not for use in emergency situations.

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

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

8.6 If you have a concern about the mental health of a student

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.

Signs to look out for:

- Changes in behaviour, emotions, or school performance
- Physical signs, like signs of self-harm, weight and appetite changes
- Tiredness, difficulty concentrating
- Less interest in things they enjoy
- Being more socially isolated
- Low mood or tearfulness
- Low self esteem or feeling of worthlessness

How to support

- You can talk to student if you have a good relationship with them
- Show curiosity about how they are feeling
- Listen carefully and non-judgementally
- Acknowledge feelings and help the child to label their feelings. Don't try to offer solutions.

If you are worried about the mental health of a child that is also a safeguarding concern, take immediate action by following informing your DSL.

If a child has shared a mental health concern that is **not** a safeguarding concern, speak to the DSL to agree a course of action.

In Gumley we support and educate students about their understanding of mental health. This can be seen in school via tutor time, assemblies, PSHE lessons. Information is to support early intervention, work carried out by our pastoral team and school counsellor.

Gumley is also working with the Anna Freud Foundation where students and families have access to online counselling/support.

8.7 If you have a concern about a student suffering from domestic abuse.

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

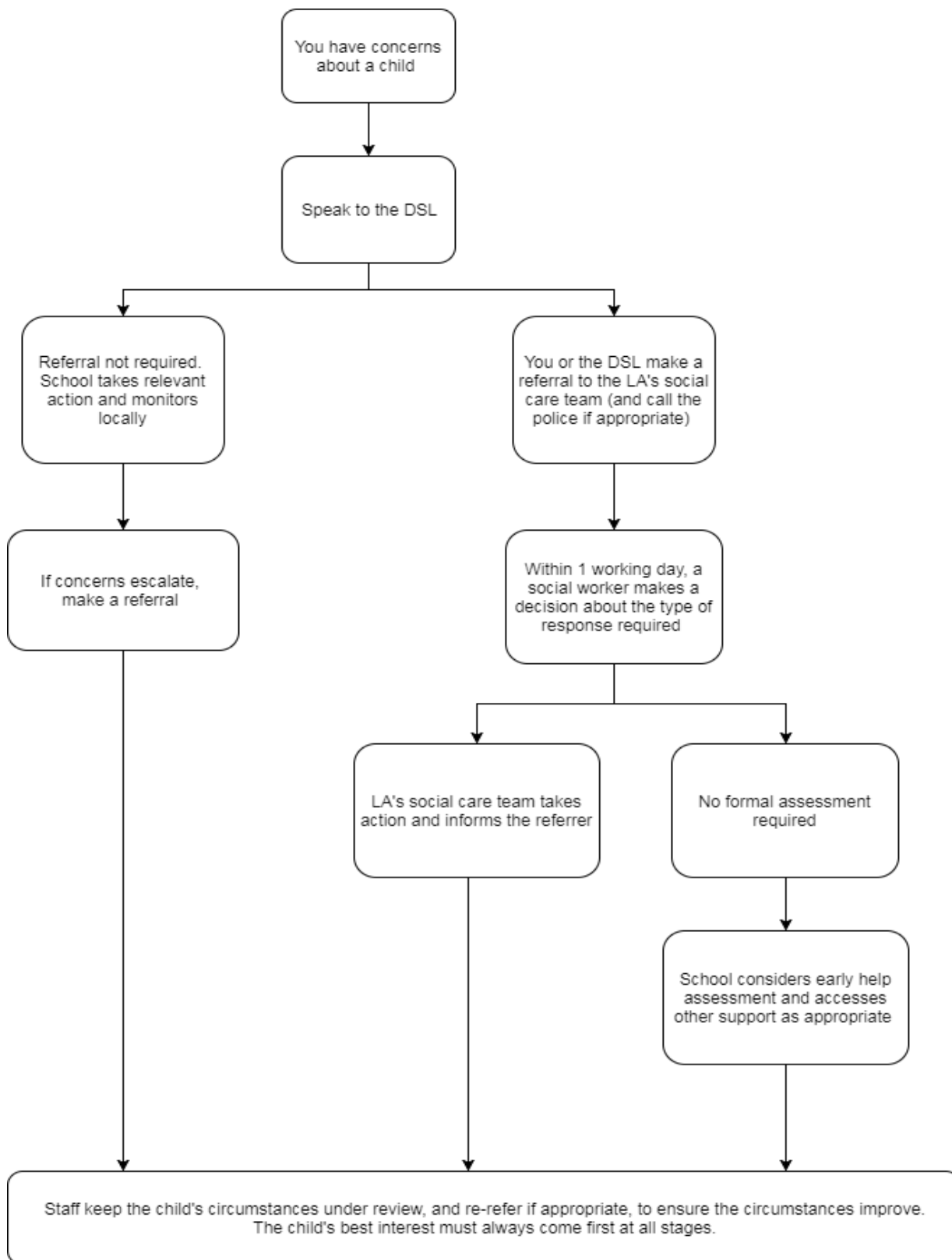
Some signs of witnessing domestic abuse

- Being aggressive or bullying others
- Anti-social behaviour
- Having anxiety, depression or suicidal thoughts
- Being constantly ill, not eating
- Playing truant

How to support

- Speak to DSL
- Make a clear record of any conversation with student and your concerns
- If the child reports abuse, ensure you share you must report to DSL who will inform children's services.

Figure 1: procedure if you have concerns about a child's welfare



8.7 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 headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out by the local authority, 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 headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Points to remember:

- All school staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for interviews or work with individual students or parents to be conducted in view of other adults.
- All staff should be aware of and have read the Gumley House School: Staff Code of Conduct & Safe Practice policy.
- Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers and online safety will be given at induction. Staff will have CPD training on Esafety each year. Refer to “Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings” available on the DfE website.
- We understand that a student may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher.
- The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity.
- If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult the LADO, without notifying the Headteacher first.
- The school will follow Hounslow Local Safeguarding Children Partnership’s procedures for managing allegations against staff.
- Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice for the LADO and LA HR Team making this decision.
- In the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of Governors with advice set out by Hounslow Local Safeguarding Children Partnership.
- We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.
- If, after initial consideration and discussion with the relevant agencies, it is concluded that the allegation does not involve a possible criminal offence, the school will deal with it through the school’s own internal procedures. The 2025 DfE guidance: ‘Keeping Children Safe in Education’ recommends that: “if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days”.
- Where further investigation is required to inform consideration of disciplinary action, then the advice of the Local Authority Designated Officer should be sought on how such an investigation should be carried out, and by whom.

In some settings and circumstances, it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of the school.

- If an allegation is determined to be false, the Headteacher will refer the matter to the London Borough of Hounslow Children’s Social Care Intake Team (or, if the student has an allocated social worker, to the allocated social worker) to determine whether the student concerned is in need of services or may have been abused by someone else. In the rare event that an allegation is shown to have been deliberately invented or malicious, the Headteacher should consider whether any disciplinary action is appropriate against the student who made it, or if the person concerned is not a student, whether the police should be asked to consider if any action might be appropriate against the student who made it, or, if the person concerned is not a student, whether the police should be asked to consider if any action might be appropriate. (See “Hounslow Council Child Protection Procedures for Dealing with Allegations Against Teaching and Other Staff”)
- If the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion and the reasons for the decision should be recorded on the child protection file.

Low level concerns

All low-level concerns raised about a member of staff, supply teacher, volunteer or contractor (including those that do not meet the harm threshold) need to be recorded.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ that an adult working on or on behalf of the College may have acted in a way that is inconsistent with our code of conduct. This could include inappropriate behaviour outside of work.

Examples of low-level behaviour would include, but is not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of a child on a personal mobile phone
- Engaging with a child on a one-to-one basis in a secluded area
- Humiliating the individual

[Keeping Children Safe in Education 2025]

Low level concerns may arise as a result naivety, be accidental or unintentional, be the result of misinformed action, a failure to follow procedures, a lack of training or, more rarely, deliberate abuse.

Concerns should be submitted in writing. The person raising the concern should:

- provide a concise record including a brief context in which the low-level concern arose
- include details which are chronological, and as precise and accurate as possible of any such concern and relevant incident(s)
- the record should be signed, timed and dated.

Concerns should be submitted to the DSL. Records will be kept confidential (shared only on a need to know basis) and will be held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

8.8 Allegations of abuse made against other students

We recognise that children are capable of abusing other children. 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. Sexual violence and sexual harassment can occur between two or more children of any age; it can exist on a continuum and may overlap. At Gumley we make it clear there is zero tolerance to sexual violence and sexual harassment. 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 students 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 students in the school at risk
- Is violent
- Involves students 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 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse to include Sexual violence and harassment

Staff should be aware that safeguarding issues can manifest themselves via **child-on-child** abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment e.g., grabbing bottoms, touching breasts/ genitalia, pulling down skirts/ trousers
- gender-based violence
- sharing nudes and semi-nude imagery; and
- initiation-type violence and rituals.

. Different gender issues can be prevalent when dealing with **child-on-child** abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Gumley we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. For an allegation against a student to be considered a safeguarding allegation, some of the following features may be present:

The allegation:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the school
- is violent
- involves students being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse, sexual violence or sexual harassment, such as indecent exposure, sexual assault, up skirting, or sexually inappropriate pictures or videos
- indicates that other students may have been affected by this student
- indicates that young people outside the school may be affected by this student

At Gumley we will support the victims of **child-on-child** abuse.

If a student makes an allegation of abuse against another student, staff have been given the following guidance to follow:

- You must tell the DSL and record the allegation, but do not investigate it.
- Do not view any videos or images of any incidents.
- The DSL will contact the local authority children's social care team and follow its advice, and report the incident to 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 – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- The DSL will consider the importance of supporting siblings following incidents

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimise the risk of **child-on-child** abuse by:

To achieve this, we will:

- Challenging any form of derogatory or sexualised language or behaviour.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent.
- Ensuring students know they can talk to staff confidentially and report abuse confidentially.
- Ensuring staff are trained to understand that a student harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- 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 peer-on-peer 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
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

8.9 Sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student 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 student to delete it
- Ask the student(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 student(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 student(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 student(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 students 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 students involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult . Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to 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 student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

If at any point in the process there is a concern that a student 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 community support officer or dialling 101.

Recording incidents

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

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE/ PD programme & work through external agencies. 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

Students 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 students so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

8.10 Reporting systems for our students

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 students 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
- All students are informed at the start of the year who the DSL and DDSL are; posters around the school site. Students are aware that these staff are key when wanting to share a safeguarding concern.

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. We have policy guidance in place to ensure our ability to protect and educate our students and staff in their use of technology. This is located on the school website and within our staff handbook.

- The online safety Designated lead review our IT systems annually, working closely with appropriate staff i.e., network manager, designated safeguarding lead, pastoral leads.

To address this, our school aims to:

- Have robust processes in place (including filtering and monitoring systems) to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

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 students 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 students 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 students are not present
 - Staff will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' 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
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Gumley recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our [anti-bullying/behaviour] policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

10. Supporting Staff

We recognise that staff working in the school who have become involved with a student who has suffered harm, or appears likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

11. Supporting Students

We are aware that students who are abused, suffer from **child-on-child** abuse, or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. For students at risk, school may be the one stable place from which they can expect security and reassurance. It is important not only to be alert to potential abuse but to provide the support to help students through difficult times; providing them with the coping skills that can help avoid situations arising and deal with the emotional difficulties afterwards if they do.

We support students through:

- The school ethos, which promotes a positive, supportive and secure environment and which gives all students and adults a sense of being respected and valued.
- The curriculum which encourages self-esteem and self-motivation; teaches students how to recognize acceptable and not acceptable behaviour and how to keep themselves safe.
- Regular liaison with other professionals and agencies that support the students and their families, especially support services and agencies involved in the safeguarding of children.
- A commitment to develop productive, supportive relationships with parents, whenever it is in the child's interest to do so.
- The development and support of a responsive and knowledgeable staff group trained to respond appropriately in safeguarding and child protection situations.
- Clear information about who to see if worried or concerned and confident that they will be listened to and their concern will be taken seriously. (See Appendix 5 for guidance on 'Dealing with Disclosure'.)

12. Confidentiality

We recognise that all matters relating to Safeguarding and Child protection are confidential. The Headteacher or DSLs will disclose any information about a student to other members of staff on a need to know basis only. Guidance about sharing information is now regulated through GDPR policy and practice. Guidance has been updated in the DfE booklet 'Information sharing: Advice for Practitioners providing Safeguarding Services 2018'.

Points to consider:

- 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
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

13. Working with Parents/Carers

- Our partnership with parents/carers is central to our ethos. We place great importance on maintaining strong school-home links. A sensitive approach is particularly needed when dealing with safeguarding issues and we recognise that parents' and children's right to privacy should be respected as appropriate. Attitudes to and contact with parents should be non-judgemental in order to obtain the most conducive working relationship. The priority will always be the needs of the child and effective liaison is crucial for this.
- In general, we will discuss any safeguarding protection concerns with parents/carers before approaching other agencies, and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the Designated Safeguarding Lead. However, there may be occasions when the school will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.
- Parents/carers will be informed about our safeguarding policy through: website, Parent Handbook etc.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

14. Students with special educational needs, disabilities or health issues

We recognise that students 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
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students 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

We offer extra pastoral support for these students. This includes:

- Support by teaching assistants, SEND staff, peer mentoring, pastoral managers and school counsellors, Anna Freud Charity.

15. Students with a social worker

Students 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 student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the students' 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

16. 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, Katie Collins - SENDCo, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

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

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

The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL and pastoral team.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

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

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

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

18. Whistle-Blowing

- We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the management of Safeguarding and Child Protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/LADO following the Whistleblowing Policy.
- Whistle-blowing re the Headteacher should be made to the Chair of the Governing Body whose contact details are readily available to staff.

19. Use of reasonable force and other restrictive interventions.

New guidance updates Sept 25.

Terminology definitions

Reasonable force: Physical contact by a member of staff on a student to control or restrain their actions/movements. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances. Any use of reasonable force is an example of a restrictive intervention and may or may not involve the use of restraint.

Restrictive interventions: Any planned or reactive action which limits a student's movement, liberty or freedom to act independently. Restrictive interventions may include use of equipment, medication or seclusion. Restrictive interventions may or may not involve the use of reasonable force.

Restraint: A form of restrictive intervention involving direct physical contact and force where the intention is to prevent, restrict, or subdue movement of the body, or part of the body, of a student. Restraint may also include mechanical or chemical restraint. Restraint may or may not involve the use of force

Always try to defuse situations without physical intervention.

In the very unlikely event of the need for staff to restrain a student, the Education and Inspections Act 2006 section 93, 93A and 95 outlines the right of staff to use 'such force as is reasonable' for the purpose of preventing a student from:

- Committing an offence
- Causing personal injury to, or damage of the property of any person (including themselves) and
- Prejudicing the maintenance of good order and discipline.

What is deemed as reasonable force has to be proportionate to the consequences it is intended to prevent and should be the minimum force required to achieve the desired result. It will only be used as a last resort, when other non-physical strategies have been tried.

Factors to consider

- **Is it necessary?**

Are there reasonable alternative ways to manage the situation and get the desired outcome?

- **Is it proportionate?**

Staff should use the last amount of restrictive intervention for the least amount of time. Consider medical conditions, other vulnerabilities, age and size of the child. Equality Act 2010

- **Has the student's welfare been considered?**

Staff should consider the impact on the student's overall welfare, balanced against any actions taken. Seek to maintain respect for a student's dignity

- **Student and staff support**

Check impact on both – welfare and medical. De-brief/reflect – any learning/future planning/risk assessment

- **Record and report**

School will record the following details as a minimum:

- names of student and staff directly involved

- any relevant needs or circumstances of the student, including whether the student involved has an identified special educational need or disability and their SEN status code
- time, date, location and approximate length of time the intervention was used
- brief account of the incident, including what led up to the incident, identified or potential triggers if known, any preventative or de-escalation strategies used, what type of reasonable force was applied, the degree of force, and details of physical injuries sustained, if applicable
- brief account of why the use of force was assessed as necessary in that instance
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts.

School will record additional details to support our evaluation of incidents to identify best practices and areas for improvement. For example, the student's and/or witnesses' accounts of what happened, when and how parents were notified, and what follow-up has taken place. Incidents will be shared with the governing board.

Staff who are likely to need to use physical intervention will be appropriately trained.

20. Anti-Bullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under safeguarding and child protection procedures. This includes all forms e.g. cyber, racist, homophobic, online, **child-on-child abuse**, sexual abuse and gender related bullying. We keep a record of known bullying incidents.

21. Children Missing from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when students are not at school. This means we will have at least two up to date contacts numbers for parents/carers. Parent/carers will be reminded each half term by Edulink to inform the school as soon as possible if their contact numbers change.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

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
- 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

In response to the guidance in Keeping Children Safe in Education (2024) the school has:

1. Staff who understand what to do when children do not attend regularly.
2. Appropriate policies, procedures and responses for students who go missing from education (especially on repeated occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take students off-roll when they:
 - a) leave school to be home educated
 - b) move away from the school's location
 - c) remain medically unfit beyond compulsory school age
 - d) are in custody for four months or more (and will not return to school afterwards); or
 - e) are permanently excluded

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.

The Education (Pupil Registration) (Amendment) (England) Regulations came into force on 1 September 2016, amending the 2006 regulations.

Our duties include:

- notifying their local authority when it is about to remove a student's name from the school admission register under any of the 15 grounds listed in the regulations at non-standard transition points.

When removing a student's name, the notification to the local authority we will include:

- The full name of the student
- The full name and address of any parent/carer with whom the student normally resides
- At least one telephone number of the parent/carer
- The student's future address and destination school, if applicable
- The grounds under which the student's name is to be removed from the admission register

Therefore, our school will inform the Local Authority (LA) of any student admission or a student removal from our roll within five days using the Statutory Notification of Admission/Deletion form, so that the LA can identify and safeguard children missing from education. For a parental/carers decision to electively home educate they must inform the school in writing of their decision and we will send this to the Local Authority.

Staff will be trained to look out for the signs and individual triggers 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 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 in immediate danger or at risk of harm.

Emergency contact details – All families will be expected to provide two emergency contact numbers for their children.

Persistent absence – The attendance of all students is monitored closely by Senior Leadership Team and our Welfare Officer for attendance. The Welfare Officer has regular meetings with Heads of Year regarding attendance and follow the

Local Authority (LA) procedures. For reporting absences all concerns are forwarded to the Local Education Welfare officer for Hounslow.

22. Private Fostering

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

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

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

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

Gumley House has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA.

On admission to the school, Gumley House will take reasonable steps to verify the relationship of the adults to the child who is being registered.

23. Racist Incidents

- Racist incidents are recorded as a matter of protocol. We acknowledge that repeated racist incidents or single serious incident may lead to consideration under safeguarding and Child Protection procedures. All racist incidents will be dealt with under our Anti Bullying Policy.

24. Prevention

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

The school community will therefore:

- Work to establish and maintain an ethos where students feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with students e.g. Through Learner voice, PD, Student Council and questionnaires asking if they have happy/sad break and lunchtimes.
- Ensure that all students know there is an adult in the school whom they can approach if they are worried or in difficulty.

- Include safeguarding topics across the curriculum including RE, PSHE, PD, Tutor time, CE days and acts of worship. Create opportunities which equip students with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, e-safety and road safety.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

25. Safeguarding students who are vulnerable to exploitation, forced marriage, Female Genital Mutilation, Honour Based Violence, Breast Ironing or Trafficking

Our safeguarding policy and the school's values, ethos and behaviour policies, provide the basic platform to ensure students are given the support to respect themselves and others, stand up for themselves and protect each other.

- Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- Our staff are supported to recognise warning signs and symptoms in relation to specific issues, and include such issues in an age-appropriate way in their curriculum.
- Our school works with and engages our families and communities to talk about such issues.
- Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- Our Designated Safeguarding Lead knows where to seek and get advice as necessary.
- Our school brings in experts and uses material to support the work.

26. Health and Safety

- Our Health and Safety is set out in a different policy and reflects the consideration we give to the protection of our students both physically within the school environment, and for example in relation to internet use, (E Safety policy) and when away from the school and when undertaking school trips and visits.

27. Monitoring and Evaluation

Our Safeguarding and Child Protection policy and procedures will be monitored and evaluated by:

- The Governing Body
- The SLT via discussions with students/parents/carers
- Student surveys and questionnaires
- Safeguarding audits
- Scrutiny of Attendance data
- Scrutiny of a range of risk assessments
- Scrutiny of Governing Body minutes

- Logs of bullying/racist/behaviour incidents for SLT and Governing body to monitor
- Review of parental/carers concerns and parent/carer questionnaires.
- Annual report of the use of A01 and counsellors' feedback.

28. Safeguarding – School Policies

The Safeguarding agenda embraces issues specifically addressed in the following interrelated policies and guidance:

Staff Code of Conduct and Safe Practice
 Anti- Bullying Policy
 Behaviour for Learning Policy
 Bereavement Policy
 Attendance and Punctuality Policy
 Guidelines for Dealing with Racist Behaviour
 Use of ICT Policy including Online Safety
 Relationships and Sex Education Policy
 Intimate Care Policy
 Special Educational Needs Policy
 Equalities Policy
 Exclusions Policy
 Health and Safety Policy and Procedures
 Guidance on the Use of Reasonable Force
 Complaints and Allegations against Staff Policy
 Safer Recruitment Policy
 Continuous Professional Development Policy

Appendix 1

Recognising signs of child abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated/named/lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and/or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child.

- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath

Fractures

Fractures may cause pain, swelling or discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life
- Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g., anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others.

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene phone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies.

- Consent – agreement including all the following:
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society’s standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental Competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods.

Child Sexual Exploitation

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

The definition is:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);

- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Child criminal exploitation: county lines

Criminal Exploitation of Children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹² should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Child-on-Child Abuse

Staff will recognise that students are capable of abusing other children; this occurs when a student intentionally threatens, harms or causes distress to another student. Staff will refer any concerns immediately to the relevant head of year and a member of the safeguarding team. It may be considered a safeguarding matter if the allegation is around:

- Physical Abuse
- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol
- Emotional Abuse
- Blackmail or extortion
- Threats and intimidation
- Sexual Abuse, sexual violence and harassment
- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting
- Encouraging other children to engage in inappropriate sexual acts
- Photographing or videoing other children performing indecent acts
- Taking nudes/ semi nudes - Sexting
- Bullying
- Gender related issues
- Sexualised touching
- Violence
- Gang initiation/hazing

Hazing is the practice of rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and schools.

The signs of this may include:

- Changes in behavior
- Sudden reluctance or refusal to participate or engage
- Avoiding particular students
- Staying close to adults
- Self-harm
- Angry outbursts
- Decline in academic performance
- Excluding themselves
- Sudden development of sexualised behaviours
- Vague disclosures

Students will be taught how to recognise, keep themselves safe, and report **child-on-child** abuse to their Head of Year or member of the safeguarding team. All incidents will be investigated and dealt with.

Appendix 2

'Honour based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators – see below

Forced Marriage (FM)

This is an entirely separate issue from an arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Always call either the Contact centre or the Forced Marriage Unit 020 7008 0151.

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/schools/colleges take action without delay and make a referral to children's services.

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girls virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girl be clean/hygienic
- Is cosmetically desirable

- Mistakenly believed to make childbirth easier

IS FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs
- disclosure

Breast Ironing

Breast ironing (also known as breast flattening) is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or to disappear. It is usually carried out by mothers on their daughters, to protect them from rape and sexual harassment. In certain African cultures men believe that as soon as a girl has breasts she is ready to have sexual relationships.

There have been incidents of this happening in the UK. You may notice an unwillingness to get changed for PE, pain when moving or a flattened breast area.

Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

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

- Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.
- The signs and symptoms of a child suffering or witnessing domestic abuse are similar to other forms of abuse or neglect.

How does it affect children?

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

To talk through your concerns call the Hounslow Domestic Abuse Outreach Number 020 8247 6466 or the National Domestic Violence Helpline on 0808 2000 247.

Appendix 3

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and 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.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including behaviour policy, PSHE policy, online/ safety policy

The Department of Education guidance The Prevent Duty can be accessed via this link

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

Appendix 4

Useful Websites

Further advice on child protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/homes.aspx>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk>

Anti-bullying Alliance: <http://anti-bullyingalliance.org.uk/>

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

Department for Education (2017), Sexual violence and sexual harassment between children in schools and colleges. GOV.UK. Online. Available at:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

BBC Panorama (2017), When kids abuse kids. Online. Available at:

<http://www.bbc.co.uk/programmes/b098tgs1> [video]

Thames Valley Police (2015), Tea and consent. Online. Available at:

<https://www.youtube.com/watch?v=pZwvrXVavnQ&t=2s> [video]

Appendix 5

Dealing with a Disclosure

When a student tells me about abuse she/he has suffered what must I remember?

- Stay calm
- Do not communicate shock, anger or embarrassment.
- Reassure the student. Tell her/him you are pleased that he/she is speaking to you.
- Never enter into a pact of secrecy with the student. Assure her/him that you will try to help but let the student know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but she/he may have tried to tell others and not been heard or believed.
- Tell the student that it is not her/his fault.
- Encourage the student to talk but do not ask 'leading questions' or press for information.
- Listen and remember
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that she/he has a right to be safe and protected.
- Do not tell the student that what she/he has experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the student may retract what she/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the student again who you are going to tell and why that person or those people need to know.
- Speak to your DSL immediately and as soon as you can afterwards, make a detailed record of the conversation using the child's own language on **myconcerns** . Include any questions you may have asked. Do not add any opinions or interpretations.

NB. It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Designated Safeguarding Lead.

Students making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a student who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead.

APPENDIX 6

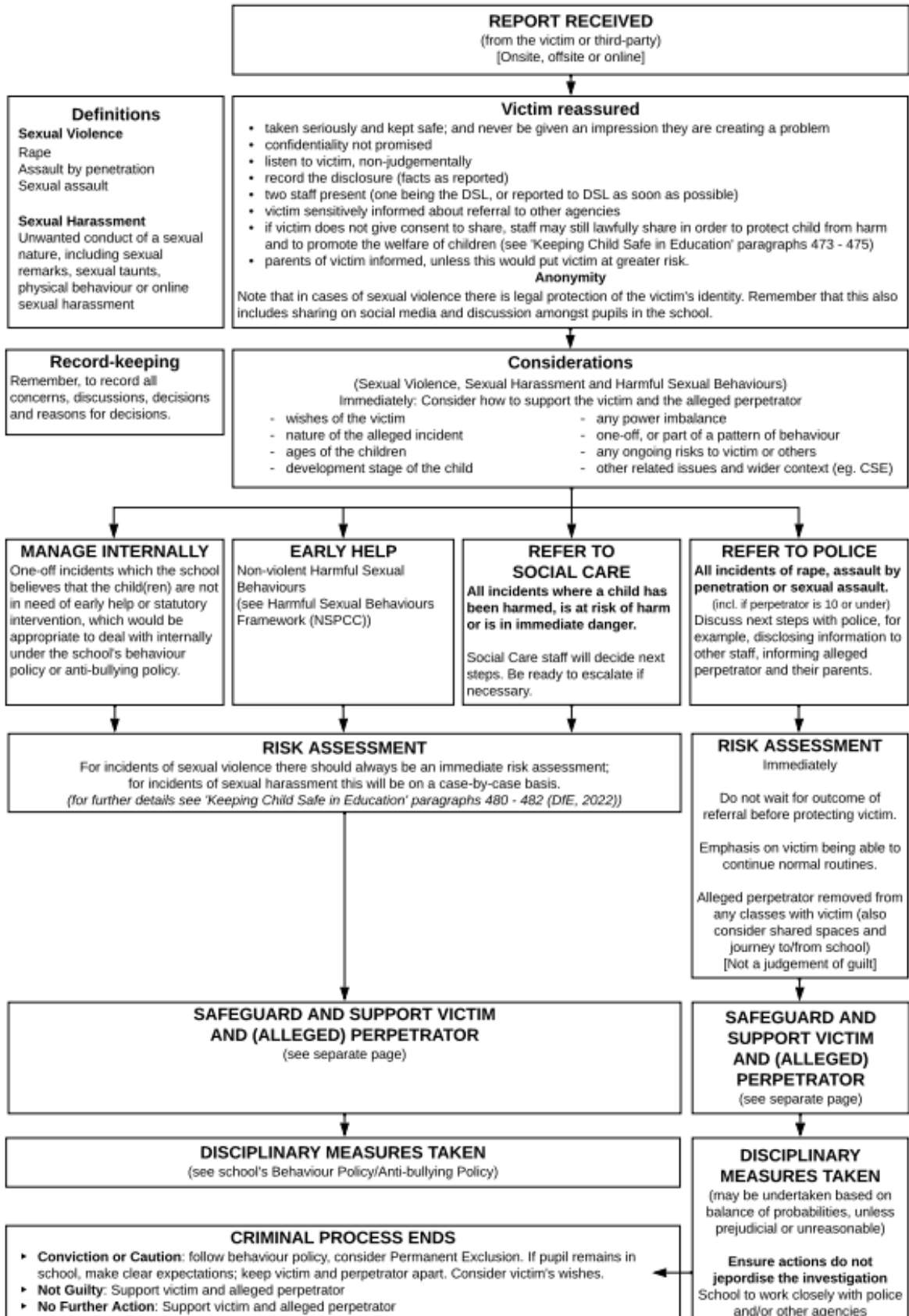
Grounds for deleting a student from the school admission register

Grounds for deleting a student of compulsory school age from the school admission register set out in the Education (Student Registration) (England) Regulations 2006, as amended

1. Where the student is registered at the school in accordance with the requirements of a school attendance order, that another school is substituted by the local authority for that named in the order or the order is revoked by the local authority on the ground that arrangements have been made for the child to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school.
2. Except where it has been agreed by the proprietor that the student should be registered at more than one school, in a case not falling within sub-paragraph (a) or regulation 9, that she has been registered as a student at another school.
3. Where a student is registered at more than one school, and in a case not falling within sub-paragraph (j) or (m) or regulation 9, that she has ceased to attend the school and the proprietor of any other school at which she is registered has given consent to the deletion.
4. In a case not falling within sub-paragraph (a) of this paragraph, that she has ceased to attend the school and the proprietor has received written notification from the parent that the student is receiving education otherwise than at school.
5. Except in the case of a boarder, that she has ceased to attend the school and no longer ordinarily resides at a place which is a reasonable distance from the school at which she is registered.
6. In the case of a student granted leave of absence in accordance with regulation that —
 - (i) the student has failed to attend the school within the ten school days immediately following the expiry of the period for which such leave was granted;
 - (ii) the proprietor does not have reasonable grounds to believe that the student is unable to attend the school by reason of sickness or any unavoidable cause; and
 - (iii) the proprietor and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the student is.
7. That she is certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither she nor his parent has indicated to the school the intention to continue to attend the school after ceasing to be of compulsory school age.
8. That they have been continuously absent from the school for a period of not less than twenty school days and
 - (i) at no time was their absence during that period authorised by the proprietor in accordance with regulation 6(2);
 - (ii) the proprietor does not have reasonable grounds to believe that the student is unable to attend the school by reason of sickness or any unavoidable cause; and
 - (iii) the proprietor of the school and the local authority have failed, after jointly making reasonable enquiries, to ascertain where the student is.

1. That she is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the student will return to the school at the end of that period.
2. That the student has died.
3. That the student will cease to be of compulsory school age before the school next meets and—
 - (i) the relevant person has indicated that the student will cease to attend the school; or
 - (ii) the student does not meet the academic entry requirements for admission to the school's sixth form.
4. In the case of a student at a school other than a maintained school, an Academy, a city technology college or a city college for the technology of the arts, that he has ceased to be a student of the school.
5. That she has been permanently excluded from the school.
6. Where the student has been admitted to the school to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the school.
7. Where—
 - (i) the student is a boarder at a maintained school or an Academy;
 - (ii) charges for board and lodging are payable by the parent of the student; and
 - (iii) those charges remain unpaid by the student's parent at the end of the school term to which they relate.

***PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**



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Source:
*Keeping Children Safe in Education September 2022 (DfE, 2022)

2022 SVSH Flowchart

Allegations against staff

(Including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

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 they 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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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 headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

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.

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 local authority 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 local authority 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 local authority children's social care services, where necessary). Where the police and/or local authority 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 local authority 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 local authority 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 local authority 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. The member of staff should be given advice on further support e.g. trade union representatives, welfare counselling, mental health lead.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care 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 governing board 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 local authority 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 local authority 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 local authority 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 local authority children's social care services, as appropriate, to agree:

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

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 local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

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

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
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 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 headteacher 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 headteacher 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 and safe practice. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL. The headteacher will review all low-level concerns to identify any patterns.

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.

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 harm threshold, 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

Safer recruitment policy

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2025

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

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 may 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
 - If they are known to the policy and children's local authority social care and
 - If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also carry out online searches (social media etc) as part of due diligence for shortlisted candidates.

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. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants

- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

➤ 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

Governors and members

All schools include:

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and 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).
- 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.

Pupils staying with host families

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

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